

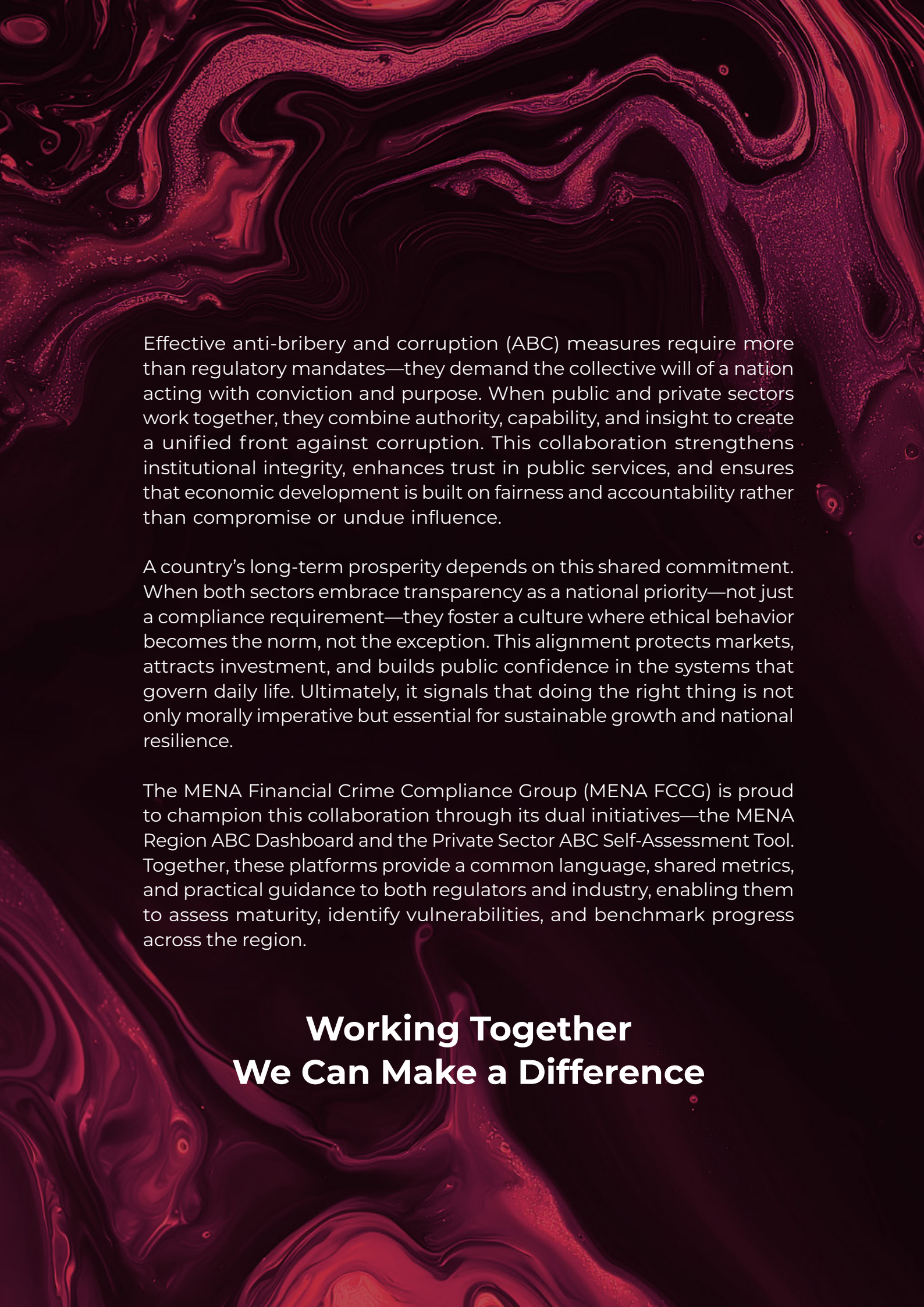


Anti-Bribery & Corruption Reference Guide

A Strategic Framework for
Transparency & Accountability

Developed by:

MENA Financial Crime Compliance Group (MENA FCCG)
in collaboration with the Global Coalition to Fight Financial Crime (GCFFC)



Effective anti-bribery and corruption (ABC) measures require more than regulatory mandates—they demand the collective will of a nation acting with conviction and purpose. When public and private sectors work together, they combine authority, capability, and insight to create a unified front against corruption. This collaboration strengthens institutional integrity, enhances trust in public services, and ensures that economic development is built on fairness and accountability rather than compromise or undue influence.

A country's long-term prosperity depends on this shared commitment. When both sectors embrace transparency as a national priority—not just a compliance requirement—they foster a culture where ethical behavior becomes the norm, not the exception. This alignment protects markets, attracts investment, and builds public confidence in the systems that govern daily life. Ultimately, it signals that doing the right thing is not only morally imperative but essential for sustainable growth and national resilience.

The MENA Financial Crime Compliance Group (MENA FCCG) is proud to champion this collaboration through its dual initiatives—the MENA Region ABC Dashboard and the Private Sector ABC Self-Assessment Tool. Together, these platforms provide a common language, shared metrics, and practical guidance to both regulators and industry, enabling them to assess maturity, identify vulnerabilities, and benchmark progress across the region.

**Working Together
We Can Make a Difference**

Anti-Bribery & Corruption Reference Guide

A Strategic Framework for Transparency & Accountability



Forward - Project Sponsor

Corruption is a corrosive force that erodes trust, weakens institutions, distorts markets, and deprives nations of their true potential. Across the MENA region, combating bribery and corruption is far more than a regulatory obligation—it is a defining strategic priority. By confronting corruption head-on, MENA countries can unlock sustainable investment, foster inclusive economic growth, and secure their rightful place as credible, competitive players on the global stage.

Effective Anti-Bribery and Corruption (ABC) frameworks create transparent, predictable environments where organizations can operate with confidence; where competition is rooted in merit rather than influence; and where public resources are safeguarded and channeled toward national progress.

In today's rapidly evolving and interconnected economy, investors, multinational corporations, and development institutions evaluate countries through the lens of governance, integrity, and corruption risk. Weak ABC controls do not simply pose compliance challenges—they diminish economic opportunity, restrict access to foreign direct investment, and limit participation in international financial and trade systems. Strengthening ABC frameworks is therefore fundamental to building resilience, enhancing competitiveness, and ensuring the region's long-term stability and prosperity.

Recognizing this imperative, the MENA FCCG has prioritized developing a comprehensive, data-driven view of ABC risks across the region, alongside a private sector ABC Self-Assessment Tool designed to elevate standards, guide institutions, and support continuous improvement. Together, these initiatives aim to promote a unified approach to transparency, accountability, and integrity across public and private sectors.

Yet, the fight against bribery and corruption cannot be achieved by governments or businesses alone. Meaningful progress requires a genuine partnership—one grounded in shared responsibility, openness, and trust. When the public sector strengthens institutions, enforces laws fairly, and champions transparency, and when the private sector embraces ethical business practices and rigorous self-governance, an enabling ecosystem emerges—one in which corruption finds no space to grow.

Collaboration through joint initiatives, information sharing, and co-developed standards not only enhances compliance but also reinforces governance, competitiveness, and social trust. By working hand in hand, both sectors can drive lasting change and advance the region's collective vision of integrity, prosperity, and sustainable development.

Special recognition and appreciation are extended to the experts and practitioners who generously contributed their time, experience, and insights to this initiative. Their commitment, professionalism, and shared aspiration for a more transparent and resilient MENA region form the foundation upon which this guide is built.



Michael Matossian, EVP
Chief Compliance Officer
Arab Bank Group
Founder MENA FCCG
Vice Chair GCFCC – MENA Chapter



ABC Reference Guide

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Preface

Traditional approaches to combating corruption, while necessary, are no longer sufficient in an increasingly complex and interconnected world. The rise of digital technologies and the exponential growth of data offer unprecedented opportunities to strengthen transparency, accountability, and enforcement.

This Anti-bribery & Corruption framework underscores the critical role of data-driven solutions in identifying patterns of illicit behaviour, enhancing risk detection, and enabling proactive interventions. By leveraging advanced analytics, machine learning, and real-time monitoring, organizations can move beyond reactive measures and adopt predictive strategies that deter corruption before it occurs.

The commitment by the GCFFC and its members is not merely on technological capabilities — but aims at cultural transformation. Public-private information partnerships empower decision-makers with actionable insights, fosters collaboration across sectors, and ensures compliance with global standards. Through these measures, we all aim to build systems that are resilient, transparent, and trusted by all stakeholders.

The Anti-Bribery & Corruption Reference Guide sets forth the principles, standards, and procedures designed to guide each organization in maintaining compliance, integrity, and operational excellence. It reflects our common commitment to upholding the highest ethical and regulatory standards while fostering a culture of transparency and accountability.

The policies outlined herein serve as a framework for consistent decision-making and risk management across all levels of the organization. They are intended to ensure that our practices align with applicable laws, industry regulations, and internal governance requirements.



Che Sidanius

Founder and Vice-Chair of the Global Coalition to Fight Financial Crime (GCFFC)
Global Head of Financial Crime and Industry Affairs, LSEG



Introduction

The MENA FCCG, in collaboration with the **GCCFC**, developed this reference guide to serve as a practical companion for public and private sector professionals committed to combating bribery, corruption, and related financial misconduct across the region.

Grounded in real-world implementation and regional experience, the guide consolidates methodologies, tools, and insights into a single accessible resource, helping practitioners understand how bribery and corruption risks emerge within organizational processes and how those risks can be effectively identified, assessed, and mitigated.

Corruption Perception in MENA: A Regional Challenge & Current Reality

A considerable proportion of MENA countries continue to fall within the “Corrupt” to “Very Corrupt” categories in Transparency International’s Corruption Perceptions Index (CPI). These rankings underscore an ongoing struggle to strengthen governance, institutional integrity, and public trust in both state and private institutions. This reality highlights the urgent need for coordinated regional reforms that promote transparency, accountability, and stronger anti-corruption safeguards.

Global corruption benchmarks such as the CPI offer useful signals, but they often do not reflect MENA-specific realities, including political dynamics, socio-economic structures, cultural sensitivities, and institutional variations across the region. To meaningfully assess bribery and corruption risks, MENA countries require a framework that moves beyond surface-level indicators and integrates the contextual factors that truly shape risk exposure.

The Need for a MENA-Tailored Approach

Factors such as freedom of the press, voice and accountability, judicial independence, state ownership structures, informal networks, and the role of public administration all directly influence both the perception and the actual incidence of corruption in the region. Tailoring ABC assessment tools to incorporate these dimensions enables a more accurate and context-specific risk profile, one that helps policymakers and compliance professionals pinpoint vulnerabilities, prioritize reforms, and monitor progress more effectively.

A tailored framework not only enhances the accuracy of risk assessments but also ensures that anti-bribery and corruption efforts support national development goals, attract foreign investment, and promote a fair, competitive, and merit-based business environment.

Empowering the Private Sector

The private sector plays a pivotal role in strengthening national integrity systems and improving the region’s standing on global corruption perception indices. Beyond meeting regulatory obligations, businesses can catalyze meaningful change by embedding transparency, accountability, and ethical conduct into their corporate DNA.

This includes:

- Implementing strong governance and internal control structures,
- Managing conflicts of interest with discipline, and
- Setting clear ethical standards that apply across the value chain.

Private sector actors can also collaborate with regulators, civil society, and international organizations through public-private partnerships, sharing intelligence, co-developing typologies, building capacity, and creating sector-wide standards that strengthen resilience against corruption. By demonstrating integrity in practice, companies protect their reputation and market position, while also helping create an enabling environment where ethical behavior becomes the norm. In markets where institutional capacity may vary, the private sector’s leadership in promoting transparency can directly influence national and regional perceptions of corruption, making it a powerful force for positive change.

MENA FCCG Vision

Our vision is a MENA region where transparency and accountability are deeply rooted in both public and private sectors

MENA FCCG, in collaboration with the Global Coalition to Fight Financial Crime (GCFFC) – MENA Chapter, developed two data-driven tools to accelerate the region’s progress in combating bribery and corruption:

1

MENA Region ABC Dashboard

Provides a comparative view of ABC risk indicators and country performance.

2

Private Sector ABC Self-Assessment Tool

Enables organizations to evaluate and strengthen their internal ABC frameworks.

Advancing Integrity in the MENA Region

The ABC Dashboard and the Self-Assessment Tool provide a unified regional and country view of bribery and corruption risk, enabling both the public and private sectors to benchmark their progress and identify areas requiring reform. By integrating country-level indicators, regulatory frameworks, and self-assessment results, the Dashboard enhances transparency, drives accountability, and promotes data-driven decision-making. It also serves as a practical tool to strengthen public-private collaboration, encourage adoption of international best practices, and highlight success stories across the region—ultimately fostering a culture of integrity, trust, and responsible growth across MENA.

Together, these initiatives transform fragmented efforts into a united movement against bribery and corruption—**building stronger institutions, greater trust, and a culture of integrity that endures.**



**MENA Region
ABC Dashboard**

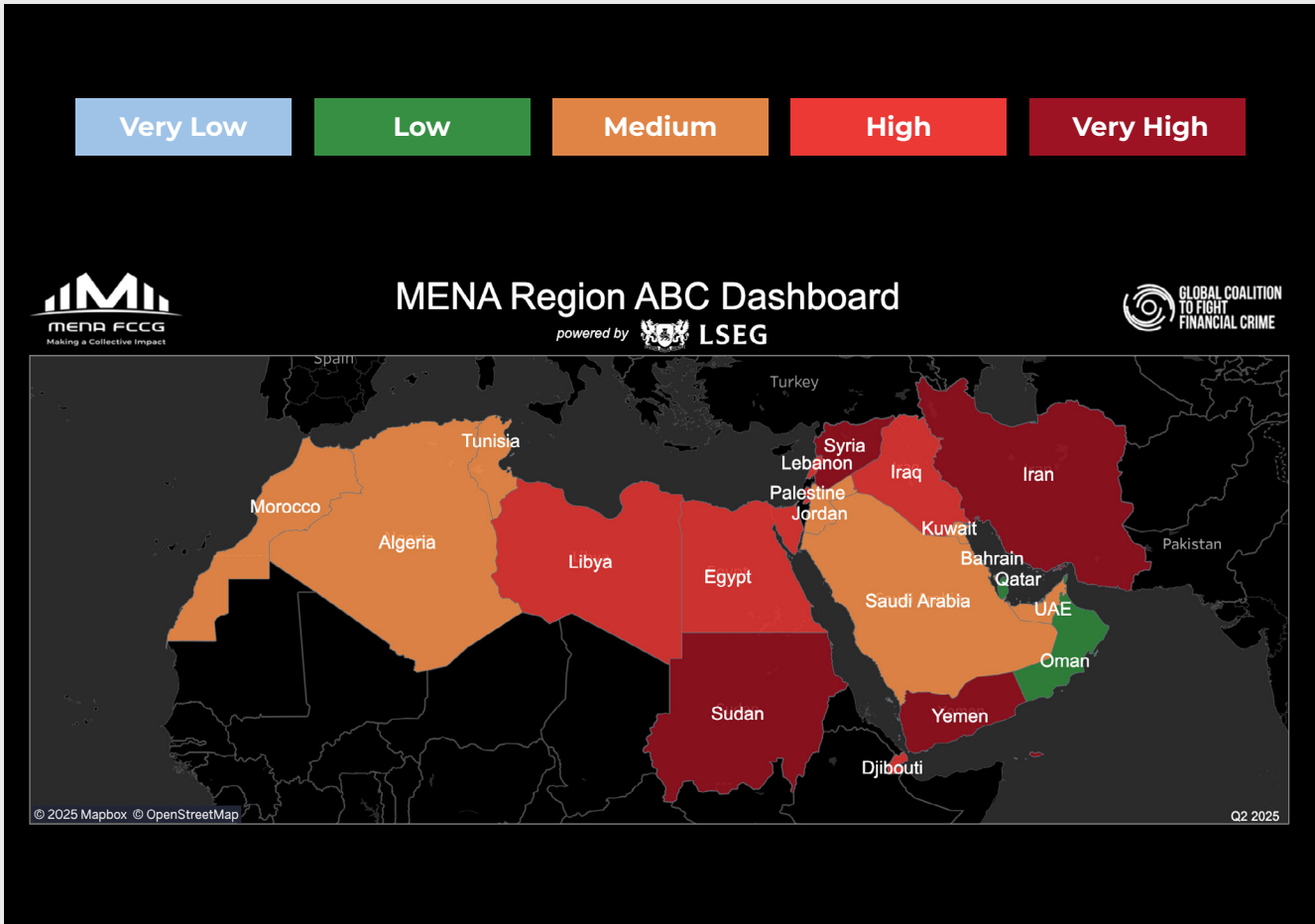


The MENA Region ABC Dashboard is an interactive risk-mapping tool for MENA countries, designed to support ABC efforts. Built on the **LSEG Country Risk Ranking Platform**, the dashboard consolidates data from multiple sources, applies structured calculations, and generates a comprehensive “Master Index” for each country.

The Master Index takes into consideration a wide variety of risk indicia across numerous sources, appropriately calibrated to provide a country specific anti-corruption risk ranking for countries within the MENA region based on the application of the defined risk scoring methodology; and a heat map that depicts the risk profile of countries based on the scoring outcomes.

Within the interactive map view, users can explore the following information for each country:

- ▶ **Rank:** The country’s position out of 247 countries ranked by LSEG.
- ▶ **Master Index:** A composite bribery and corruption risk score out of 10 (higher scores = lower bribery and corruption risk).
- ▶ **Sources:** The number of independent datasets and indices used in the assessment.
- ▶ **Band:** Countries are separated into the following five risk banding:





This targeted ranking supports regional benchmarking, helping multinational corporations and financial institutions tailor their compliance programs effectively. Effective enforcement, strong legal frameworks and international cooperation on anti-bribery standards typically characterize countries scoring in the “Low” risk bands. In contrast, those in higher risk bands may suffer from limited institutional capacity, opaque governance, and inconsistent rule of law enforcement.

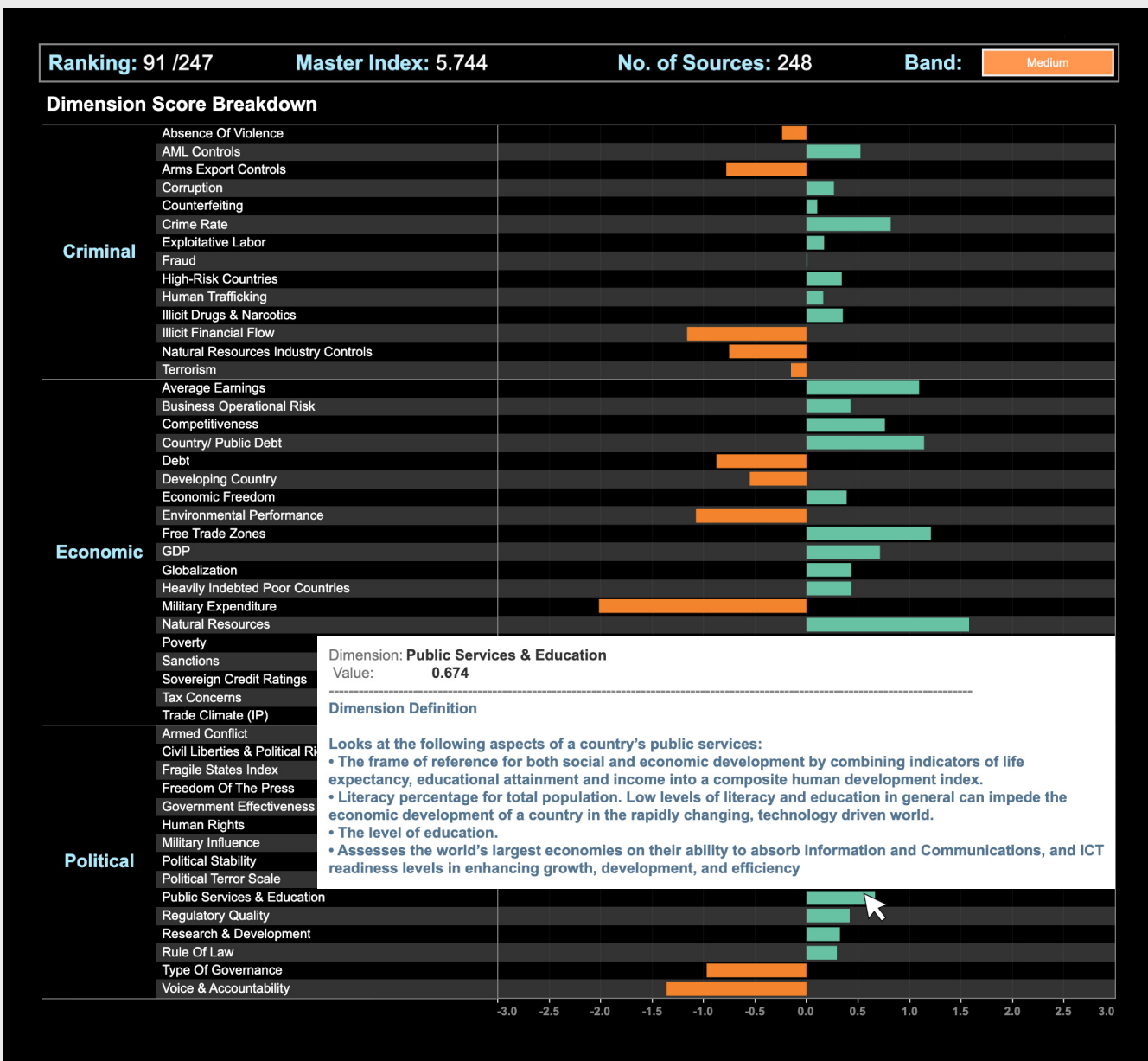
Users can click on any MENA country in the map view to access a detailed breakdown of its score. This includes an analysis across the three primary Risk Factors — Political, Economic and Criminal — along with a dimension-by-dimension assessment within each factor. Together, these dimensions provide a holistic, data-driven view of bribery and corruption exposure across the MENA region, empowering users to make informed risk management and compliance decisions, as per the below example:



Dashboard Interaction Description

The dashboard provides an interactive, drill-down view of each risk dimension. When the user clicks on any bar within the chart, a detailed information box appears summarizing three key elements:

- **The dimension name** (e.g., Public Services & Education)
- **The numerical score** assigned to that dimension
- **The dimension definition** explaining what the metric measures and why it matters



This interactive feature enables users to move beyond high-level scores and gain a deeper understanding of the context, relevance, and implications behind each metric. By revealing the underlying factors that shape every dimension, the dashboard supports informed analysis and more accurate interpretation of country-level ABC risks.



Country Risk Ranking Embedded Dimensions

A. CRIMINAL DIMENSIONS

Absence of Violence

Evaluates the following indicators to determine level of “peace” for countries:

- Number of Internal Security Officers and Police
- Number of homicides
- Number of Jailed Population
- Accessibility to small arms and light weapons
- Level of organized internal conflict
- Level of violent crime
- Political Instability
- Potential for violent demonstrations
- Political Terror Scale
- Scale of major conventional weapons imported
- Terrorism impact
- Deaths from organized conflict (internal)
- Deaths from organized conflict (external)
- Number and duration of internal conflict
- Military expenditure
- UN Peacekeeping funding
- Armed services personnel
- Nuclear and heavy weapons capabilities
- Scale of major conventional weapons exported
- Number of refugees and internally displaced people (IDP)
- Number, duration and role in external conflicts
- Relations with neighboring countries

AML Controls

Assesses whether a country has adopted AML/CFT legislations, and the effectiveness of a country’s AML controls and enforcement capabilities.

Arms Export Controls

Rates the efficiency of arms export control mechanisms of the selected country.

Corruption

Describes the level of the abuse of entrusted power for personal gain in a country. It measures the frequency and persistence of facilitation of payments where bribes are paid to receive preferential treatment for services that the bribe receiver is already required to perform by law.



Counterfeiting

Determines the rate of the following areas by country:

- Counterfeit Seizure of foodstuffs, alcoholic and other beverages
- Counterfeit Seizure of body care items, perfumes and cosmetics, and other body care items
- Counterfeit Seizure of clothing and accessories
- Counterfeit Seizure of shoes including parts and accessories
- Counterfeit Seizure of personal accessories (sunglasses, bags, watches, jewelry, and others)
- Counterfeit Seizure of mobile phones including parts and accessories
- Counterfeit Seizure of electrical/electronic and computer equipment
- Counterfeit Seizure of CD, DVD, cassettes, game cartridges (recorded, non-recorded)
- Counterfeit Seizure of toys, sporting articles, games including electronic game consoles
- Counterfeit Seizure of tobacco products
- Counterfeit Seizure of medical products
- Counterfeit Seizure of other articles (machines and tools, vehicles, office stationery, lighters, labels, textiles, packaging materials, other goods, etc.)
- Counterfeit Seizure of Overall articles – country of provenance of suspected IPR infringing goods

Exploitative Labor

Estimates the list of goods and the source country in which child labor and/or forced labor are used to produce/manufactured/farmed, etc. these goods, in violation of international standards as required under the TVPRA.

Fraud

Record the rate of police-recorded offences for Fraud. Fraud refers to obtaining money or other benefit or evading a liability through deceit or dishonest conduct, and it includes Mortgage Fraud and Financial Fraud (i.e. involving financial transactions for the purpose of personal gain. This includes using financial consumer products such as bank accounts, credit cards, cheques, store cards or online banking systems. Bank fraud; investment fraud; cheques/credit card fraud; store card fraud; online banking fraud; writing bad cheques), quackery, impersonation, identity theft, possession, creation or use of false weights for measure.

Illicit Drugs and Narcotics

Countries marked by the US Department of State determined to be major illicit drug-producing countries or major drug-transit countries as well as major precursor chemical source countries. The presence on the list does not necessarily reflect its counter narcotics effort nor does it reflect its cooperation with the US.



High-Risk Countries

List the EU high-risk third countries with strategic deficiencies under the Fourth AMLD and Fifth AMLD as well as list the UK's High-Risk Third countries.

Human Trafficking

Assesses a country's human trafficking legislation and the effectiveness of a country's human trafficking laws and enforcement capabilities. Evaluates countries on 4 tiers:

- **Tier 1:** Countries whose governments fully comply with Trafficking Victims Protections Act's (TPVA) minimum standards.
- **Tier 2:** Countries whose governments do not fully comply with TPVA's minimum standards but are making significant efforts to bring themselves into compliance.
- **Tier 2 Watchlist:** Similar to Tier 2; includes countries of which the absolute number of severe forms of trafficked victims are increasing; failure to provide evidence of increased government efforts; decreasing evidence of complicity in severe forms of trafficking by government officials.
- **Tier 3:** Countries whose governments do not fully comply with the minimum standards and are not making significant efforts to do so.

Illicit Financial Flow

Estimates unrecorded money outflows of developing and emerging economies to another country/jurisdiction due to crime, corruption and tax evasions.

Natural Resources Industry Controls

Assesses the different international and national governance and industry controls that are in place for resource-rich countries/jurisdictions.

Terrorism

Measures countries on the basis of number of terrorism fatalities. Also identifies countries that harbor terrorist or are considered state sponsors of terrorism as well as providing indicators of overall levels of terrorism threat in over 200 territories worldwide (low threat, guarded threat, elevated threat, high threat, severe threat).

Crime Rate

Measures the crime rate in terms of the count of crimes compiled to assess the effectiveness of a crime control policy, and the impact of the policy on the risk of crime victimization.



B. ECONOMIC DIMENSIONS

Average Earnings

Classifies all World Bank member economies into income groups according to Gross National Income (GNI) per capita, which is calculated using World Bank Atlas Method. The groups are:

- Low income
- Lower middle income
- Upper middle income
- High income

Business Operational Risk

Provide ratings of countries in terms of the probability of business loss occurring from the internal inadequacies of a country or a breakdown in the country's controls, operations or procedures – in particular, in terms of tax transparency and exchange of information.

Competitiveness

Uses the Global Competitiveness Index (GCI), which was developed by the World Economic Forum. GCI is based on the below pillars of competitiveness, providing a comprehensive picture of the competitiveness landscape in countries around the world at all stages of development. The pillars are:

- Institutions
- Infrastructure
- Macroeconomic environment
- Health and primary education
- Higher education and training
- Goods market efficiency
- Labor market efficiency
- Financial market development
- Technological readiness
- Market size
- Business Sophistication and Innovation

Country/Public Debt

Gives the cumulative total of all government borrowing less repayment that are denominated in a country's home currency. Public debt should not be confused with external debt, which reflects the foreign currency liabilities of both the private and public sector and must be financed out of foreign exchange earnings.

Debt

Looks at a country's total public and private debt owed to non-residents repayable in internationally acceptable currencies, goods, or services.



Developing Country

Countries of the world are also divided into two major world groups: Advanced economies & Emerging and developing countries.

Economic Freedom

Looks at the Ease of Doing Business as well as the 10 benchmarks that gauge the economic freedom of countries around the world. The benchmarks are:

- Business Freedom
- Trade Freedom
- Fiscal Freedom
- Government Spending
- Monetary Freedom
- Investment Freedom
- Financial Freedom
- Property Rights
- Freedom from Corruption
- Labor Freedom

Environmental Performance

Measures the environmental performance of country across nine categories to achieve environmental health and ecosystem vitality objectives. These two objectives consider the protection of human health from environmental harm and measure the ecosystem protection and resource management.

Free Trade Zones

Countries that have one of the following variants of Free Trade Zones: FTZs, EPZs, Free Ports, Single factor EPZ, Foreign Trade Zones and Special Economic Zones.

GDP

Evaluates Gross Domestic Product (GDP) as the sum of value added by all resident producers in the economy plus any product taxes (less subsidies) not included in the valuation of output, calculated without making deductions for depreciation of fabricated capital assets or for depletion and degradation of natural resources.

Trade Climate

Evaluates the robustness and strengths of the IP Environment of country/jurisdictions, and its propensity to improve its IP regime and provide IP protection based on:

- Patents, related rights and limitations
- Copyrights, related rights and limitations
- Trademarks & Trade secrets and market access
- IP enforcement
- Membership and ratifications of international treaties



Globalization

Looks at economic flows, economic restrictions, information flows, cultural proximity, and many other aspects.

Heavily Indebted Poor Country (HIPC)

Countries whose threshold debt is at least %150 of its exports and %250 of revenue; qualify for loans from World Bank's International Development Association or IMF Poverty Reduction and Growth Facility; and have an established track record of reforms to prevent future debt crisis. The International Monetary Fund lists countries that have qualified for, are eligible or potentially eligible and may wish to receive HIPC Initiative Assistance.

Military Expenditure

Evaluates countries based upon the spending on defense programs as a percent of Gross Domestic Product (GDP).

Natural Resources

Evaluates the oil production and exports of a country. Includes the production of petroleum (crude oil and natural gas plant liquids), dry natural gas, coal, and the net generation of hydroelectric power. It also depicts the total labor force figures.

Poverty

National estimates of the percentage of the population falling below the poverty line based upon surveys of sub-groups. The number of people in each group weights the results.

Sanctions

Lists the countries that are subjected to UN, EU, UK, OFAC, Canada, Australian, Jersey sanctions programs that range from financial sanctions, asset freezes, export/import restrictions, arms embargos, trade restrictions, technical assistance prohibitions, etc.

Sovereign Credit Ratings

Measures the risk of a build-up in arrears of principle and/or interest on foreign currency debt that is the direct obligation of the sovereign or guaranteed by the sovereign.

Tax Concerns

Provides a list of non-cooperative jurisdictions for tax purposes adopted by the Council of the European Union as well as a list of countries that have been identified by the OECD to have harmful tax regimes.



C. POLITICAL DIMENSIONS

Armed Conflict

Reviews the clashing of interests (positional differences) over national values of some duration and magnitude between at least two parties that are determined to pursue their interests and achieve their goals. Conflict items include:

- Territory
- Secession
- Decolonization
- Autonomy
- System/Ideology
- National power
- Regional predominance
- International power
- Resources
- Other

Civil Liberties & Political Rights

Freedom House's evaluation of progress and decline in 195 countries. This includes both analytical and numerical ratings, which measures freedom according to two broad categories: Political Rights & Civil Liberties.

Fragile States Index

Reviews social, economic and political pressures faced by countries to determine most stable countries versus those at the most risk of collapse and violence. The factors analyzed are:

• **Social:**

- Mounting demographic pressures
- Massive movement of refugees or Internally Displaced Persons (IDPs)
- Vengeance-Seeking Group Grievance
- Chronic and sustained human flight and brain drain

• **Economic:**

- Uneven Economic Development
- Poverty and sharp or severe economic decline

• **Political and Military**

- Legitimacy of the State
- Progressive deterioration of public services
- Violation of human rights and rule of law
- Security apparatus
- Rise of factionalized elites
- Intervention of external actors



Freedom of the Press

Measures the state of freedom of the press in the world. Reflects the degree of freedom that journalists and the means of communication enjoy in each country and the measures created by States to respect and ensure this freedom is respected. The Press Freedom Indicator examines whether there are free and independent media (all relevant sources of news and commentary including formal print, broadcast, and online news outlets as well as social media and communication applications when they are used to gather or disseminate news and commentary for the public. Applicable to artistic works in any medium).

Government Effectiveness

Analyses countries/jurisdictions in terms of the overall degree of democracy within the political culture. The effectiveness and credibility of governance instruments used to improve the quality of public services, policymaking and the degree of independence from political interferences.

Human Rights

Aggregation of source material, which measures whether the State respects or has no respect of the following human rights indicators: Global Worker's Rights & Adherence to Human Rights.

Military Influence

Danger of disproportionate military capabilities impairing development checks of whether an un-proportionate high share of military expenditures, military personnel and arms imports may have a negative effect upon human and economic development.

Political Stability

Measures the likelihood that the government will be destabilized or overthrown by unconstitutional or violent means, including domestic violence and terrorism. Also evaluates political interferences, supply chain disruptions, political violence, and other related risks that threaten the stability of the jurisdiction's government.

Political Terror Scale

Measures levels of political violence and terror that a country experiences in a particular year. The ratings are based on Amnesty International and U.S. State Department Reports.



Public Services & Education

Looks at the following aspects of a country's public services:

- The frame of reference for both social and economic development by combining indicators of life expectancy, educational attainment and income into a composite human development index.
- Literacy percentage for total population. Low levels of literacy and education in general can impede the economic development of a country in the rapidly changing, technology driven world.
- The level of education.
- Assesses the world's largest economies on their ability to absorb Information and Communications, and ICT readiness levels in enhancing growth, development, and efficiency.

Regulatory Quality

Captures perceptions of the ability of the government to formulate and implement sound policies and regulations that permit and promote private sector development.

Research and Development

Looks at the expenditure for research and development and the percentage of high-technology exports (percentage of manufactured exports).

Rule of Law

Evaluates and aggregates individual governance indicators for economies based upon six dimensions of government:

- Voice and Accountability
- Political stability
- Regulatory quality
- Government Effectiveness
- Rule of Law
- Control of corruption

Type of Governance

Analyses the development and transformation process towards democracy and market economy in international comparison; as well as examining associated qualities of democratic and autocratic authorities in governing institutions.

Voice & Accountability

Captures perceptions of the extent to which a country's citizens are able to participate in selecting their government as well as freedom of expression, freedom of association, and a free media.

Driving Change: How MENA Countries Benefit from ABC Dashboard

The MENA Region ABC Dashboard provides governments, regulators, and financial institutions with a powerful, data-driven tool to better understand and address bribery and corruption risks. By consolidating political, economic, and criminal dimensions into a single interactive platform, the dashboard enables countries to:

Identify Strengths & Weaknesses

Each country can view a breakdown of its performance across specific dimensions—such as rule of law, government effectiveness, and political stability. This allows policymakers to pinpoint areas where the country is performing strongly and highlight the dimensions where improvements needed.

Benchmark against Regional Peers

With over 240 countries ranked, MENA countries can compare their position relative to neighbors and global counterparts. This fosters healthy regional benchmarking, encouraging countries to adopt best practices from those performing better in key risk areas.

Enable Transparency and Accountability


Public visibility of corruption and bribery risk levels supports accountability, encourages citizen engagement, and builds trust in institutions. Countries demonstrating improvements highlight progress to international partners, investors, and donors.

Guide Policy and Reform Efforts

By drilling down into the underlying datasets, governments can identify the root causes of higher risk scores—such as weak enforcement, lack of transparency, or political instability—and design targeted reforms to address them.



**Private Sector ABC
Self Assessment Tool**



The Private Sector ABC Self-Assessment Tool is an innovative, automated platform designed to empower private sector entities independently evaluate the strength and maturity of their ABC compliance programs. By conducting regular self-assessments against a standardized set of indicators, criteria, and global best practices, companies can better understand their current ABC health status, identify vulnerabilities, and prioritize actions to strengthen their ABC frameworks. The tool has the following benefits:

Drive Continuous Improvements

Provides actionable guidance to adapt to evolving regulatory expectations. This feature enables companies to consistently refine and enhance their ABC frameworks by identifying evolving risks and adjusting controls proactively.

Demonstrate Commitments

Shows dedication to ethical, transparent operations, beyond words, through actions. By actively engaging in the self-assessment process, companies showcase their genuine commitment to ethical conduct & accountability.

Identify Improvement Areas

Highlights gaps and opportunities to strengthen compliance efforts. The tool pinpoints specific gaps across policies, procedures, controls, and practices, allowing entities to take targeted actions.

Benchmark against Best Practices

Companies can compare their ABC programs against international standards. Using standardized scoring and comparisons, companies can measure their ABC maturity against regional and international peers.



Assessment Areas

The Self-Assessment Tool incorporates **15 Assessment Areas** grouped into **three main dimensions** and encompasses **240 evaluation metrics**. This robust framework enables a thorough evaluation of ABC compliance practices across all operational dimensions.

Dimension One: Governance and Culture of Integrity

This dimension evaluates how leadership commitment, organizational structures, and employee awareness combine to establish an ethical environment that promotes accountability, transparency, and zero tolerance toward corruption since a strong governance framework and a culture of integrity form the foundation of an effective ABC compliance program.

It encompasses the following assessment areas:

1. Top-Level Commitment & Oversight

This area evaluates the depth of leadership's visible commitment to integrity, ethical conduct, and zero tolerance for bribery and corruption—supported by robust governance structures, clear accountability, and active board and senior management oversight.

It Examines:

1.1 Anti-Bribery and Corruption Culture

Evaluates an organization's shared values and behaviors that promote integrity, transparency, and zero tolerance for bribery or corruption.

1.2 Tone from the Top

Evaluate whether the Board and Senior Management actively promote integrity, allocate resources, and demonstrate clear commitment to anti-bribery and corruption (ABC).

1.3 Integrity & Conduct Framework

Assess if clear accountability, defined roles, and consistent enforcement of ABC policies are in place, promoting ethical behavior, proper oversight, and effective response mechanisms across all levels of the organization.



2. Strategies and Policies

Assesses the coherence, clarity, and accessibility of the organization's ABC strategy, policies, and procedures—ensuring they are practical, consistently applied, and aligned with evolving laws, regulations, and international best practices.

It Examines:

2.1 Firm-Wide ABC Policy

Evaluate whether a comprehensive ABC policy applies across all jurisdictions, with regular reviews and updates to ensure alignment with evolving laws and best practices.

2.2 Code of Conduct

Determine if the Code of Conduct clearly defines acceptable behavior, zero tolerance for bribery, and if it guides employees, contractors, and partners on ethical decision-making, reporting obligations, and compliance with ABC standards.

3. Risk Assessment

Examines the rigor and frequency of the organization's risk identification and evaluation process to determine exposure to bribery and corruption—covering geographic, industry, business-partner, and transaction-level vulnerabilities.

It Examines:

3.1 Risk Assessment Elements

Verify if bribery and corruption risks are systematically identified and prioritized using structured methodologies ensuring that internal and external risks are evaluated using defined criteria.

3.2 Risk Assessment Framework & Implementation

Assess whether risks are monitored, documented, and addressed through regular reviews and data-driven analysis.

4. Control Environment

Reviews the strength, design, and operating effectiveness of internal controls, approval hierarchies, and segregation of duties that collectively prevent, detect, and respond to bribery and corruption risks.



It Examines:

4.1 Whistleblowing Framework

Assess whether safe, confidential reporting channels exist, with non-retaliation policies and clear investigation procedures in place. An effective whistleblowing framework provides clear reporting channels, defined procedures for investigation, and safeguards to promote transparency, accountability, and a culture of trust.

4.2 Monitoring & Reporting Framework

Evaluate if bribery and corruption incidents are promptly identified, investigated, and reported through structured oversight mechanisms.

4.3 Assurance & Continuous Improvement Framework

Check if regular audits, benchmarking, and program reviews drive continuous improvement.

5. Training and Awareness

Measures how effectively employees, management, and third parties are educated and engaged on ABC expectations through tailored, scenario-based, and recurring training that builds a culture of integrity and accountability.

It Examines:

5.1 Employee Onboarding & Induction

Confirm whether employee onboarding includes mandatory ABC training and certification of policy understanding.

5.2 Ongoing Awareness and Training

Assess if regular anti-bribery and corruption training and communication reinforce ethical behavior, which is aimed at ensuring continuous reinforcement of ethical behavior, policy updates, and lessons learned from past incidents.

5.3 Risk- Based & Specialized Training

Verify tailored training for high-risk roles and third parties, with ongoing evaluation.



Dimension Two: Conduct and Operational Practices

This dimension evaluates the effectiveness of an institution’s operational controls and behavioral practices in preventing, detecting, and responding to bribery and corruption risks within daily business activities. It focuses on how integrity is embedded in core operational processes, ensuring that ethical conduct is consistently upheld across all levels of the organization.

Key components under this dimension include:

6. Third Parties

Evaluates the thoroughness of due diligence, onboarding, contractual safeguards, and ongoing monitoring of third parties—ensuring that intermediaries, suppliers and agents operate under the same ethical & compliance standards as the organization.

It Examines:

6.1 Governance and Controls

Evaluate approval processes, documentation, and monitoring for third-party relationships.

6.2 Contractual obligations

Check if contracts include ABC clauses, audit rights, and termination provisions in order to address violations and uphold ethical and legal standards throughout all business relationships.

6.3 Due Diligence & Monitoring

Assess structured risk-based due diligence and ongoing monitoring of third parties.

7. Hiring Practices and Enforcement

Assesses the integrity and transparency of recruitment, promotion, and disciplinary processes to ensure that hiring decisions, performance management, and enforcement actions reinforce ethical conduct and deter misconduct.



It Examines:

7.1 Hiring guidelines

Ensure recruitment processes include vetting procedure, integrity checks and include enforcement measures that prevent conflicts of interest, favoritism, or the hiring of individuals involved in unethical conduct.

8. Gifts, Entertainment and Hospitality

Examines the adequacy of controls, thresholds, approval processes, and record keeping for gifts, entertainment, and hospitality to ensure they are proportionate, transparent, and free from any intent to influence business decisions.

It Examines:

8.1 Gifts, Entertainment and Hospitality Framework

Verify clear Gift, Entertainment and Hospitality policies, approval thresholds, and monitoring mechanisms that ensure transparency, fairness, and alignment with anti-bribery and corruption standards.

9. Sponsorships

Reviews procedures to ensure sponsorships are legitimate, transparent and not used to disguise improper advantages.

It Examines:

9.1 Sponsorships Framework

Assess due diligence and approval controls relating to Sponsorships to ensure they serve legitimate business purposes, comply with anti-bribery standard and prevent conflicts of interest or improper influence.

10. Charitable Contributions

Examines the governance and documentation around donations and charitable giving to prevent corrupt practices.

It Examines:

10.1 Charitable Contributions Framework

Assess how the firm manages charitable donations to ensure they are used ethically and not as a means to influence business or gain improper advantage.



Dimension Three: Strategic Influence and External Engagements

This dimension examines how the organization manages its external relationships, strategic investments, and influence channels to ensure integrity, transparency, and alignment with anti-bribery and corruption (ABC) principles. It assesses whether the institution's strategic decisions, partnerships, and advocacy activities are conducted responsibly and without exposure to undue influence or conflicts of interest.

Key components under this dimension include:

11. Political Contributions

Evaluates compliance with laws & internal policies governing contributions to political parties, candidates & causes.

It Examines:

11.1 Political Contributions Framework

Confirm formal political donation approval processes and prohibitions against facilitation payments. It evaluates controls that prohibit or tightly regulate contributions and require senior-level approvals.

It examines monitoring, documentation, and reporting mechanisms to prevent misuse for bribery or undue influence.

12. Facilitation Payments

Evaluates the controls and policies regarding facilitation payments.

It Examines:

12.1 Facilitation Payments Framework

Assess whether clear prohibitions around facilitation payments are in place, determine how the firm detects, and responds to facilitation payment, and whether reporting mechanisms, and employee training are in place to ensure zero tolerance and compliance with ABC standards.



13. Subsidiaries & Significant Investments

Assesses how the organization extends ABC standards to subsidiaries, joint ventures and significant investments.

It Examines:

13.1 Subsidiaries & Significant Investments Framework

Ensure consistent ABC standards across all entities and investments including due diligence, monitoring, and oversight mechanisms that promote consistent policy implementation, transparency, and ethical conduct.

14. Mergers and Acquisitions

Reviews due diligence, integration and post-acquisition monitoring processes to identify and manage bribery and corruptions risks.

It Examines:

14.1 Mergers and Acquisitions

Evaluate integration of ABC controls into its mergers and acquisitions due diligence and post-transaction processes.

15. Driving Collective Impact

Looks at how the organization collaborates externally to promote integrity and collective action against bribery and corruption.






It Examines:

15.1 External Engagements

Assess how the firm collaborates with external stakeholders to strengthen collective anti-bribery and corruption efforts. It focuses on participation in global initiatives, partnerships, and policy forums to promote transparency, share best practices, and drive continuous improvement across the wider ecosystem.

Assessment Rating Criteria

This framework categorizes firms' competencies into five maturity levels, reflecting the effectiveness of their Anti-Bribery and Corruption (ABC) Compliance Program. Each level demonstrates the organization's ability to identify, mitigate, and manage bribery and corruption risks—showing increasing sophistication, integration, and impact as maturity improves.

	<p>Advanced: ABC program fully embedded within the organization, demonstrating a proactive and dynamic approach to ABC</p>
	<p>Integrated: ABC program integrated into the organization's operational processes, with a focus on consistency & alignment with other corporate initiatives, but not fully embedded</p>
	<p>Established: ABC program is established, but implementation may be fragmented or lacking sophistication; ongoing improvement processes seen in higher levels</p>
	<p>Developing: ABC program is in its early stages, with some basic components in place, significant gaps exist in implementation and overall maturity</p>
	<p>Not Started: There is no ABC program or in planning phase to align with minimum standards</p>

1. Advanced: The ABC Compliance Program is fully embedded within the organization, demonstrating a proactive and dynamic approach to anti-bribery and corruption risks.

2. Integrated: The ABC Compliance Program is well established and integrated into the organization's operational processes, with a focus on consistency and alignment with other corporate initiatives, but not fully embedded.

3. Established: The ABC Compliance Program is in place, but implementation may be fragmented or lacking some of the sophistication and ongoing improvement processes seen in higher levels.

4. Developing: The ABC Compliance Program is in its early stages, with some basic components in place, but significant gaps exist in implementation and overall maturity.

5. Not Started: The ABC Compliance Program has not been started. There are no formal or informal policies, procedures, or systems addressing bribery and corruption risks. The organization may not have recognized the need for such a program or has not yet initiated any actions to establish one.

The below is the detailed assessment criteria:

Rating Criteria	ABC Assessment Areas	Advanced	Integrated	Established	Developing	Not Started
Governance & Leadership	<ul style="list-style-type: none"> - Top-Level Commitment & Oversight - Hiring Practices & Enforcement 	Strong, visible commitment from the board and senior leadership, with clear accountability and a dedicated team overseeing ABC initiatives.	Senior leadership engaged, with ABC program integrated into broader corporate governance. Clear roles assigned for oversight.	The program has executive support, but oversight not fully ingrained into the senior leadership team. Responsibilities may be decentralized.	Limited commitment from senior leadership with no clear ownership or designated resources for ABC. Accountability may be unclear.	No visible commitment or engagement from leadership regarding anti-bribery and corruption; no designated personnel or team overseeing compliance or ABC-related matters, and lack of accountability for anti-bribery and corruption within the governance structure.
Risk Assessment	<ul style="list-style-type: none"> - Risk Assessment 	Comprehensive, continuous risk assessment processes, with periodic updates considering emerging threats.	Comprehensive risk assessments conducted periodically, although may not be as frequent or dynamic as in the Advanced level.	Risk assessments conducted periodically, but they may be more reactive than proactive and less comprehensive.	Risk assessments are either non-existent or ad-hoc. Limited understanding of high-risk areas.	No formal or informal processes in place for assessing bribery and corruption risks; no understanding of high-risk areas or geographical, industry, or third-party risks, and no monitoring or evaluating of risks related to bribery or corruption.
Policies & Procedures	<ul style="list-style-type: none"> - Strategies & Policies - Gifts, Entertainment - Sponsorships - Charitable & Political Contributions - Facilitation Payments 	Well-established, regularly updated anti-bribery policies that clearly communicated to all stakeholders, including third parties.	Established anti-bribery and corruption policies and procedures integrated into the overall compliance framework. Policies regularly reviewed.	Anti-bribery and corruption policies are in place, though they may lack regular updates or comprehensive coverage in all business areas.	Basic anti-bribery policies may be in place, but they may be incomplete, outdated, or poorly communicated.	No ABC policy or related procedures in place; no formal or informal guidelines or communication on acceptable business conduct or ethical behavior

Rating Criteria	ABC Assessment Areas	Advanced	Integrated	Established	Developing	Not Started
Training & Awareness	- Training & Awareness	Mandatory, ongoing, and tailored anti-bribery and corruption training at all levels. Includes management, employees, and key external partners.	Regular training provided, but less tailored and more generic than in the Advanced level.	Training provided, but it may be less frequent, with a focus on certain key roles and not an organization-wide initiative.	Limited or sporadic training. Lack of a comprehensive training program for all employees and key third parties.	No ABC training programs for employees, management, or third parties. Employees are unaware of potential risks, ethical standards, or how to report misconduct, and lack of education on legal and regulatory obligations regarding bribery and corruption.
Monitoring & Enforcement	- Control Environment - Subsidiaries & Significant Investments - Mergers & Acquisitions	Robust monitoring mechanisms, including regular audits, reviews, and a whistleblower system. Quick response to violations with documented disciplinary measures.	Monitoring and enforcement mechanisms are in place but may not be as extensive or proactive as in an Advanced program. Some internal auditing.	Monitoring exists, but may be more limited in scope, and enforcement mechanisms may not be consistently applied.	Little to no monitoring in place, with few or no systems to track compliance or address violations. Enforcement may be inconsistent or nonexistent.	No systems or procedures to monitor or detect bribery or corruption risks; no established mechanisms to investigate or respond to allegations of bribery or corruption, and no defined process for disciplinary actions or consequences in case of violations.
Third-Party Management	Third Parties	Due diligence is regularly conducted for all third parties, and contracts explicitly include anti-bribery clauses.	Regular due diligence processes for third parties, but may not be as thorough or consistent across all relationships.	Third party due diligence is conducted, but may be inconsistent or only applied to high-risk partners.	Little to no due diligence on third parties. ABC clauses may not be included in contracts.	No due diligence processes for third parties (vendors, contractors, etc.) related to bribery and corruption; no ABC clauses included in contracts with third parties, and no formal oversight or control over third-party relationships that could expose the organization to bribery or corruption risks.

Rating Criteria	ABC Assessment Areas	Advanced	Integrated	Established	Developing	Not Started
Culture	- Training & Awareness	A pervasive culture of integrity and ethical behavior, with employees empowered to report concerns without fear of retaliation.	Growing culture of compliance, with increasing buy-in across the organization, but not fully ingrained in all areas.	Some commitment to ethical behavior is visible, but it not fully embedded across all levels and departments.	Lack of a strong ethical culture or focus on integrity. Employees may not feel empowered to report concerns, and whistleblower mechanisms may be absent.	No organizational culture or formal expectations around ethical behavior, transparency, or integrity; employees may not feel encouraged or safe to report concerns or misconduct, and there may be no understanding or appreciation of the importance ABC practices within the workforce.
Continuous Improvement	- Control Environment - Subsidiaries & Significant Investments - Mergers & Acquisitions	Mechanisms in place for continuous review and enhancement of the ABC program based on internal audits, feedback, and external developments.	Structured review process exists but may not be as adaptive or agile as the Advanced level.	Processes for feedback and improvement exist, but may not be fully formalized or systematically applied.	No formal process for reviewing or improving the program, and ABC compliance is likely reactive rather than proactive.	No mechanisms in place for reviewing, updating, or improving any ABC policies, procedures, or practices, and the organization has not yet started to take proactive steps to address or prepare for ABC compliance.

Functional Requirements

The Private Sector ABC Self-Assessment Tool is a web-based application designed for private-sector entities to evaluate the maturity of their ABC Compliance Program. The tool automates the assessment process, calculates maturity scores, and provides dashboard visualizations that enable informed decision-making, development of targeted action plans, and continuous improvement.

• Access and Registration

The tool is accessible through a dedicated link on the MENA FCCG website under the ABC Dashboard section. The landing page includes:

- User login/registration interface for new and returning users.
- Authentication using username/email and password credentials.
- Password reset and recovery functionalities.

• Self-Assessment Module

The assessment module enables users to complete a structured questionnaire consisting of predefined ABC compliance questions.

Key functionalities include:

- The assessment is organized into 15 assessment areas, covering 240 questions.
- Upon completion, the tool automatically calculates:
 - ✓ Individual maturity scores for each assessment area.
 - ✓ Aggregated overall maturity score, mapped to the five-tier rating scale (Advanced, Integrated, Established, Developing, Not Started).
- The tool identifies gaps, weaknesses, and areas requiring enhancement based on user responses.

• Data Management

The tool shall allow users to:

- Save progress and return to the assessment later.
- View previously completed assessments and compare results.
- Update responses and regenerate results whenever needed.
- Copy or download the questionnaire in Excel or PDF format.
- Download dashboards and assessment outputs in Excel or PDF formats.

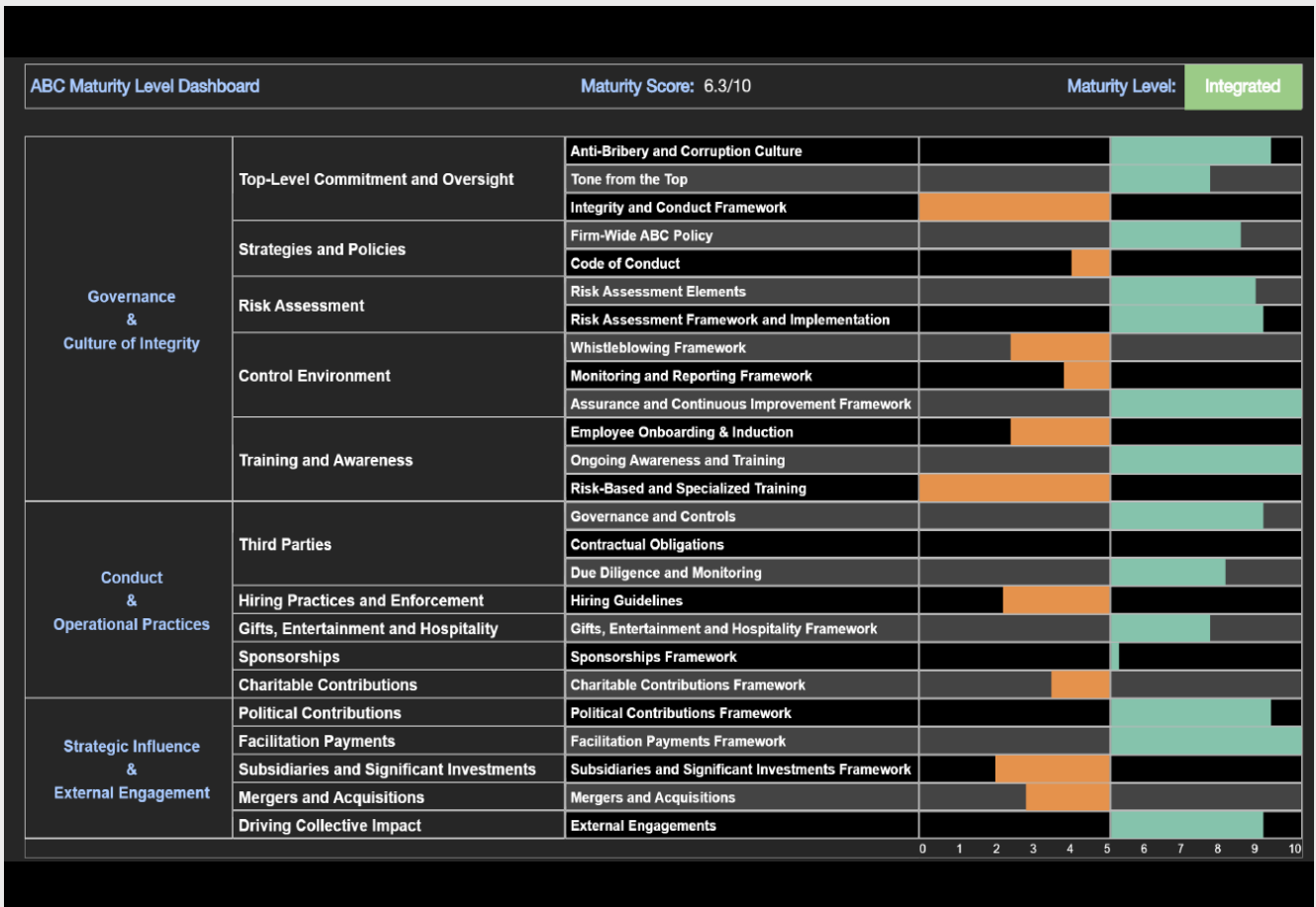
• Dashboards and Reporting

The tool provides dynamic and interactive dashboards designed to help users interpret their results and identify improvement areas.

Dashboard Features Include:

- **Overall Maturity Level Visualization:** Display of the user's maturity score and classification level.
- **Assessment Area Breakdown:** Visual representation of scores across all 15 assessment areas, enabling easy comparison and benchmarking.
- **Key risk areas and improvement opportunities:** Identification of weak areas requiring priority attention.
- **Download Reports:** Users can download or export dashboard visualizations in PDF or Excel format.

Below is an example of the dashboard view:

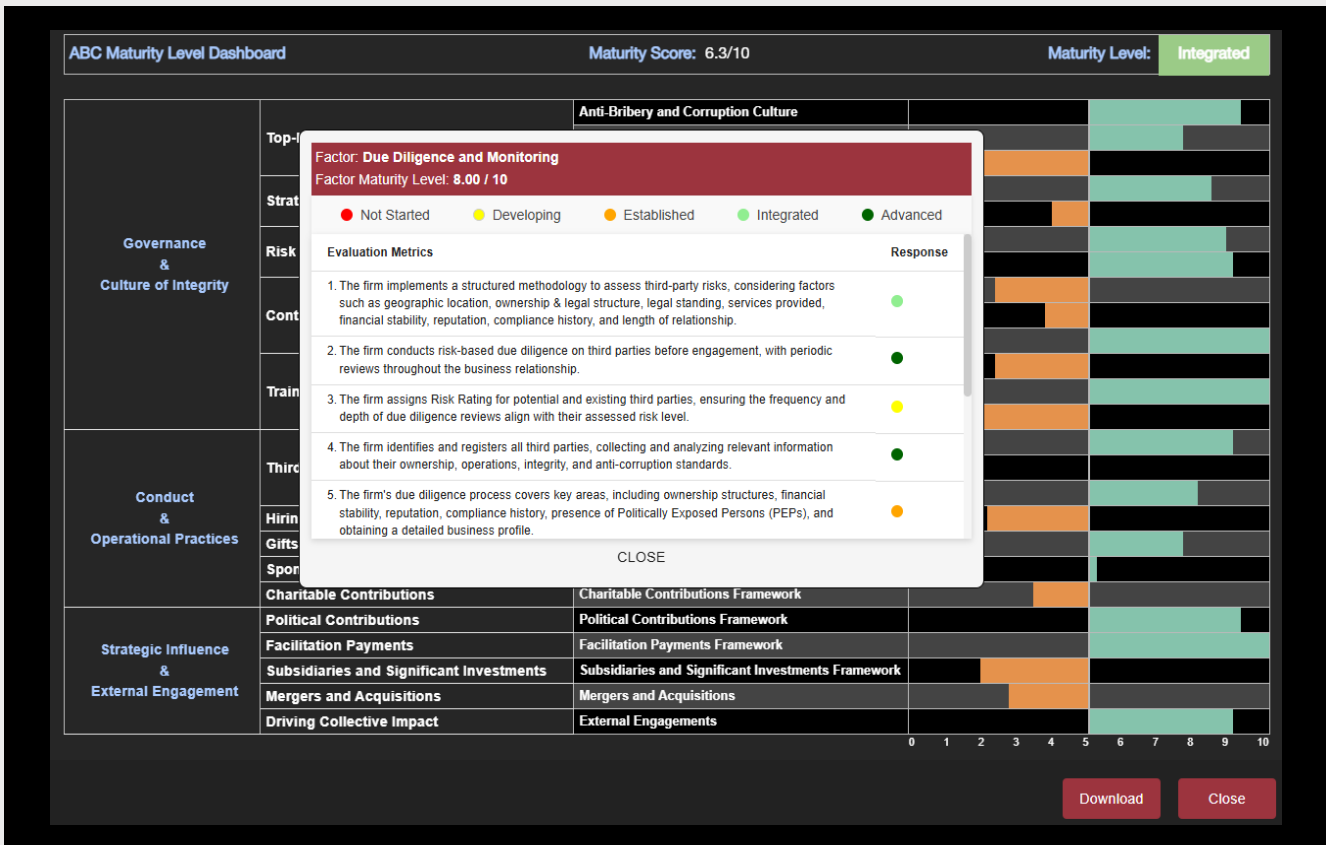




When a user clicks on any bar within the dashboard, a detailed information box appears showing:

- The exact factor name (e.g., Due Diligence & Monitoring)
- The numerical score for that factor
- The corresponding rating tier (Not Started → Advanced)

This interactive capability enhances clarity by helping users understand the context, relevance, and implications of each scoring component.



The Private Sector ABC Self-Assessment Tool provides users with a comprehensive, data-driven view of their ABC program maturity. Through interactive dashboards, automated scoring, and detailed indicator drill-downs, the tool transforms raw assessment responses into clear insights that highlight strengths, pinpoint gaps, and identify priority areas for improvement. By offering downloadable reports, structured visualizations, and a standardized maturity scale, the tool empowers organizations to make informed decisions, strengthen their compliance frameworks, and drive continuous enhancement of their Anti-Bribery and Corruption controls.

Driving Transparency: Ensuring Accountable ABC Self-Assessment

The private sector will be encouraged to complete the ABC self-assessment tool in a transparent and accurate way as new regulatory expectations drive a stronger demand for accountability. Across the region, regulators are no longer satisfied with frameworks that exist only on paper—they now require verifiable proof that management not only designs, but also effectively implements its ABC programs. For example, in the UAE, authorities demand a high degree of transparency, requiring institutions to substantiate their responses with clear documentation of policies, training, monitoring, and enforcement measures. This shift ensures that responses reflect the true maturity of compliance programs and exposes areas where internal frameworks require strengthening.

Transparency in answering the questionnaire is therefore critical—not only to demonstrate compliance during regulatory examinations, but also to build resilience, safeguard reputation, and mitigate regulatory risks.



Call to Action: Regulators should mandate the completion of the ABC self-assessment tool across all private sector entities. Making the tool compulsory will ensure systematic evaluation of program maturity, reinforce accountability, and create a uniform benchmark that strengthens the private sector's overall integrity and resilience. At the national level, this mandate will elevate ABC standards, positioning jurisdictions as safer, more transparent, and more attractive to both investors and international partners.

Incentives for Building Culture of Integrity

Beyond regulatory pressure, the private sector has strong incentives to adopt and sustain a robust conduct and compliance program. A well-structured ABC framework enhances an institution's reputation, builds trust with customers, investors, and international partners, and positions the entity as a reliable and transparent market player. It also reduces regulatory risks by demonstrating proactive accountability, which can ease supervisory scrutiny and prevent costly penalties. Moreover, strong compliance programs create operational efficiencies, reduce exposure to fraud and misconduct, and ensure long-term sustainability. Most importantly, they open doors to global opportunities, as international investors and counterparties increasingly demand evidence of integrity and good governance before engaging with private sector entities.



Closing Message

The MENA FCCG’s flagship initiatives—the ABC Self-Assessment Tool and the MENA Region ABC Dashboard—mark a transformative milestone in advancing integrity, transparency, and accountability across the region. Together, they reflect a shared regional ambition: to institutionalize ethical conduct and to empower both public and private sectors to confront bribery and corruption through data-driven insight, collaboration, and unwavering commitment.

By equipping institutions with practical mechanisms to measure, evaluate, and strengthen their ABC frameworks, these tools elevate compliance from a procedural requirement to a strategic capability. They encourage organizations to self-assess with candor and rigor, fostering a culture of continuous improvement where integrity becomes a source of competitive advantage rather than a checkbox obligation.

Beyond strengthening internal governance, these initiatives create a regional ecosystem of cooperation. The MENA Region ABC Dashboard offers a macro-level lens through which policymakers, regulators, and industry leaders can identify emerging risks, benchmark progress, and share leading practices. Simultaneously, the Private Sector ABC Self-Assessment Tool enables companies to enhance controls, elevate ethical standards, and align their ABC maturity with global expectations.

Together, these platforms transform isolated efforts into unified regional and national movements against corruption. They reinforce stronger governance, deepen regulatory oversight, and build trust—trust that attracts investment, strengthens financial stability, and enhances the region’s standing as a credible and competitive global partner. They also support cross-border cooperation, elevate regional resilience, and lay the groundwork for sustainable, inclusive growth.

As the MENA FCCG continues to champion this agenda, the mission remains clear: to promote collective impact through collaboration, transparency, and innovation. The vision is of a future where integrity defines institutions, accountability is embedded in daily practice, and corruption has no place to take root.

By standing united and acting with purpose, the MENA region can unlock its full potential—driving prosperity, fairness, and lasting progress for generations to come.





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We also express our deep gratitude to the many project team members, subject-matter experts, and IT colleagues who dedicated countless hours after their regular workdays to bring this initiative to life. Their shared sense of higher purpose, unwavering collaboration, and willingness to support one another at every step exemplified the spirit of teamwork and integrity that this project stands for. Together, they transformed a challenging mandate into a meaningful contribution that will strengthen transparency, accountability, and ethical conduct across the MENA region and beyond.

Lastly, we extend our sincere appreciation to the additional leaders who inspired us to broaden our journey and deepen our collective commitment to combating bribery and corruption. We are grateful to Mr. Khalid Bubshait, Director at a confidential Saudi government authority, whose introduction to the United Nations Development Programme (UNDP) opened an important pathway for collaboration. We also thank Dr. Anga R. Timilsina, PhD, Global Advisor for Anti-Corruption and Financial Integrity and Dr. Fatma Usheva, PhD, Governance Data Specialist at the UNDP Global Policy Centre for Governance, for their engagement and encouragement. Their invitation to participate in the Second Global Conference on Harnessing Data to Improve Corruption Measurement, held at the United Nations Headquarters in New York, reflects a shared belief in the power of partnership and data-driven integrity. Their support further reinforces the regional and global relevance of this initiative, and strengthens our collective resolve to advance transparency, accountability, and ethical governance.

**Working Together
We Are Making a Difference**



GLOBAL COALITION
TO FIGHT
FINANCIAL CRIME