

## Anti-Corruption Policies in Asia and the Pacific *Self-Assessment Report Pakistan*

Over the last decade, societies have come to realize the extent to which corruption and bribery has undermined their welfare and stability. Governments, the private sector and civil society alike have consequently declared the fight against corruption to be of highest priority.

In the Asia-Pacific region, twenty-one countries have expressed their commitment to fight corruption by endorsing an anti-corruption action plan within the framework of the ADB/OECD Anti-Corruption Initiative for Asia and the Pacific, a first-of-its-kind partnership between all stakeholders of Asian and Pacific countries. The Action Plan comprehensively promotes the regions' objectives and needs for reform to develop effective and transparent systems for public service, to strengthen anti-bribery initiatives, to promote integrity in business operations, and to support citizens' involvement.

In order to gain a comprehensive and structured overview of the endorsing countries' legal and institutional framework in place to ensure and enhance transparency in the public sector, combat bribery and promote transparency in business operations, and facilitate public involvement in the fight against corruption, endorsing countries of the Action Plan have decided to take stock of their relevant legal and institutional provisions in place.

The following report reflects the Anti-Corruption Policies that Pakistan has reportedly in place as of October 2003. Organized along the topics of the Anti-Corruption Action Plan for Asia and the Pacific, it outlines the legal and institutional framework governing each of its issues, the respective implementing agencies and recent of planned reforms.

Self-assessment reports provided by the other countries that have endorsed the Anti-Corruption Action Plan for Asia-Pacific as well as a summarizing overview of the anti-corruption policies in the region are available at the Initiative's website ([www1.oecd.org/daf/asiacom/stocktaking.htm](http://www1.oecd.org/daf/asiacom/stocktaking.htm)). For further information about the Anti-Corruption Initiative for Asia-Pacific and its work, please refer to [www1.oecd.org/daf/asiacom/](http://www1.oecd.org/daf/asiacom/).



**Pillar I : Developing Effective and Transparent Systems for Public Service**

Action Plan objective	Regulatory or legal framework (pls. corresponding document or legal text)	Institution in charge of implementation (i.e. ministry, department, independent internal or external oversight body etc.)	Relevant recent or planned reforms in this area, i.e. their objectives, implementation stages, outputs and timeframe.
<p><u>Integrity in Public Service:</u> Establish systems of government hiring of public officials that assure openness, equity, and efficiency and promote hiring of individuals of the highest levels of competence and integrity through:</p>			
<p>a) Development of systems for compensation adequate to sustain appropriate livelihood and according to the level of the economy of the country in question</p>	<p>Rules of Business, 1973 (scanned document attached as file annexure-I.doc)</p>	<p>Pay and Pension Committee, Ministry of Finance</p>	<p>The current system of Pay and Pension Committee is stuck in an incremental approach to enhancing remunerations. The approach fails to make an adequate impact, therefore, a number of recent reforms/planned reforms have initiated/proposed a drastic departure from this methodology. The foremost is the 'Access to Justice Program' in which quantum enhancement in compensation paid to the judges has been proposed. On ground, the Central Board of Revenue (CBR) reforms and the Motonway and Highways Police have actually enhanced the pay packages to a reasonable level (in the case of CBR the enhancement is in selected areas).  National Anti-corruption Strategy (NACS) has called for enhancing remunerations to a living level for all public sector employees. A detailed paper for developing a road map is under preparation.</p>



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<p>b) Development of systems for transparent hiring and promotion to help avoid abuses of patronage, nepotism, and favouritism, help foster the creation of an independent civil service; and help promote a proper balance between political and career appointments</p>	<p>The Civil Servants Act, 1973                      The Punjab Civil Servants Act, 1974                      The Sindh Civil Servants Act, 1973                      The Balochistan Civil Servants Act, 1974                      The NWFP Civil Servants Act, 1973                      The Federal Public Service Commission Ordinance, 1977                      The Punjab Public Service Commission Ordinance, 1978                      The Sindh Public Service Commission Act, 1989                      The Balochistan Public Service Commission Act, 1989                      The NWFP Public Service Commission Ordinance, 1978                      (Scanned documents attached as file annexure-II.doc)</p>	<p>Federal/Provincial Public Service Commission(s)                      Establishment Division in the Federation and equivalent Provincial Departments in the Provinces</p>	<p>There is a high level of credibility enjoyed by the Public Service Commissions. However, not all appointments fall within their purview. In all such cases the respective departments undertake the selection process. There have been complaints of loss of meritocracy in these appointments in recent years. NACS has proposed institutional strengthening to allow for an increased scope of the Public Service Commissions and improvements in the appointment mechanism of organisations to ensure meritocracy at all levels. Currently there is no specific policy for creating a balance between political and career appointments since the country has a long tradition of strictly meritocratic selection of senior civil servants. However, the Prime Minister is empowered to directly appoint any person to a post in the service of the Federation and in recent years some such appointments have been made but these have been sporadic, as per need, and no formal framework to develop a balance exists.</p>
<p>c) Development of systems to provide appropriate oversight of discretionary decisions and of personnel with authority to make discretionary decisions</p>	<p>a) Oversight of discretionary decisions:                      - Rules of Business, 1973                      - Wafaqi Mohtasib (Ombudsman) Order-I of 1983                      - Punjab Provincial Ombudsman Act, 1997                      - Balochistan Ordinance No. VI of 2001                      - Establishment of the Office of Ombudsman for the Province of Sindh Act, 1991                      (Scanned documents attached as file annexure-III.doc)</p>	<p>Federal Ombudsman                      Provincial Ombudsman                      In case of the Federal and Provincial governments, individual heads of organisations and in case of local governments oversight mechanisms have been entrusted to various committees</p>	<p>The Devolution Plan envisages appointment of District Ombudsman and monitoring Committees consisting of inter alia civil society members to oversee the working of all tiers of local governments.                      Police reforms under the Police Order 2002 proposes creation of National/Provincial/District Public Safety Commissions as oversight on working of the Police. Some of these are already functional.                      NACS has recommended rationalization of</p>

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<p>d) Development of personnel systems that include regular and timely rotation of assignments to reduce insularity that would foster corruption</p>	<p>b) Oversight of personnel with authority to make discretionary decisions:                      Sindh Local Government Ordinance, 2001                      Balochistan Local Government Ordinance, 2001                      NWFP Local Government Ordinance, 2001                      Punjab Local Government Ordinance, 2001                      Police Order, 2002                      (documents available at <a href="http://www.nrb.gov.pk">www.nrb.gov.pk</a> )</p> <p>The Civil Servants (Appointment, Promotion, and Transfer) Rules, 1973                      (document available at <a href="http://www.Pakistan.gov.pk/establishment-division/policies">www.Pakistan.gov.pk/establishment-division/policies</a>)                      The Sindh Civil Servants (Appointment, Promotion, and Transfer) Rules, 1974                      The Balochistan Civil Servants (Appointment, Promotion, and Transfer) Rules, 1979                      The NWFP Civil Servants (Appointment, Promotion, and Transfer) Rules, 1980                      (Scanned documents attached as file annexure-IV.doc)                      The Punjab Civil Servants (Appointment, and Conditions of Service) Rules, 1974                      (document available at <a href="http://www.punjab.gov.pk">www.punjab.gov.pk</a> )</p>	<p>Establishment Division in the Federation and equivalent Provincial Departments in the Provinces</p>	<p>discretionary powers by redesigning business processes.</p> <p>NACS calls for introduction of modern career management and planning systems and enforcement of code of conduct on influencing transfer, posting decisions.</p>

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Integrity in Public Service: Establish ethical and administrative codes of conduct that proscribe conflicts of interest, ensure the proper use of public resources, and promote the highest levels of professionalism and integrity through:			
a) Prohibitions or restrictions governing conflicts of interest	<p>Oath statements of specific office bearers specified in the Third Schedule of the Constitution of the Islamic Republic of Pakistan, 1973 (documents available at <a href="http://www.pakistan.gov.pk/law-division">www.pakistan.gov.pk/law-division</a>)</p> <p>Government Servants (Conduct) Rules, 1964</p> <p>The Balochistan Government Servants (Conduct) Rules, 1979</p> <p>The NWFP Government Servants (Conduct) Rules, 1987</p> <p>The Punjab Government Servants (Conduct) Rules, 1964</p> <p>(scanned documents attached as file annexure-V.doc)</p>	Establishment Division in the Federation and equivalent Provincial Departments in the Provinces and State owned Enterprises	NACS calls for review and improvement of the ethics framework for the entire public sector and to include inter alia a comprehensive clause on conflict of interest in code of ethics.
b) Systems to promote transparency through disclosure and/or monitoring of, for example, personal assets and liabilities	<p>Freedom of Information Act, 2002. (scanned document attached as file annexure-VI.doc)</p> <p>Government Servants (Conduct) Rules, 1964</p> <p>The Balochistan Government Servants (Conduct) Rules, 1979</p> <p>The NWFP Government Servants (Conduct) Rules, 1987</p> <p>The Punjab Government Servants (Conduct) Rules, 1964</p>	<p>Federal and Provincial Divisions/Departments controlling various cadres</p> <p>Election Commissioner</p> <p>Provincial Local Government Commissions</p> <p>Public Safety Commissions</p>	<p>Promulgation of Freedom of Information Ordinance, 2002.</p> <p>Changes in the Rules of Business, 1973 to bring them in conformity with the Freedom of Information Ordinance, 2002 as recommended by NACS.</p> <p>Amendments to the Representation of People Act, 1975 through the Representation of People (Amendment) Ordinance, 2002.</p> <p>NACS has recommended development of a formal mechanism to monitor asset declarations of public servants and legislators</p>

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	<p>The Sindh Civil Servants Act, 1973 Representation of People Act, 1975 (scanned documents attached as file annexure-VII.doc) Local Government Ordinance, 2001 Police Order, 2002 (Documents available at <a href="http://www.nrb.gov.pk">www.nrb.gov.pk</a>)</p>		<p>Promulgation of Local Government Ordinance, 2001 with specific provisions on transparency, conflict of interest, disclosure, and participatory governance. Promulgation of Police Order, 2002 which includes an oversight mechanism ensuring transparency and accountability.</p>
<p>c) Sound administrative systems which ensure that contact between government officials and business services users, notably in the area of taxation, customs and other corruption-prone areas, are free from undue and improper influence</p>	<p>Income Tax Ordinance, 2001. Sales Tax Act, 1990. Customs Act, 1969. (documents available at <a href="http://www.cbr.gov.pk">www.cbr.gov.pk</a>) Pakistan Telecommunications (Re-organisation) Act, 1996 (document available at <a href="http://www.pta.gov.pk">www.pta.gov.pk</a>) National Electric Power Regulatory Authority (NEPRA) Act, 1997</p>	<p>Central Board of Revenue (CBR). Pakistan Telecommunication Authority National Electric Power Regulatory Authority</p>	<p>Reforms in the business processes of CBR have been underway for the last 3 years. With the promulgation of Income tax Ordinance 2001; Universal self-assessment system has been introduced with random audits of the taxpayers. Similarly Rules and Procedures governing collection of Sales Tax have been redesigned to minimise interaction with the taxpayer. The whole system is now audit based and the audit schedule is circulated to selected taxpayers at least a month in advance. On the Customs side tariffs have been rationalised with the maximum bar at 25% ad-val. Electronic filing of Bill of Entry and Lading has been introduced at selected ports. CBR has also set up Medium and Large Tax Payers Units (LTU) where facilities for all federal taxes are provided under one roof. Introduction of e-government project in the Punjab province NACS calls for business processes re-engineering to simplify and configure around customer needs, increasing standardisation, maximising automation, and reducing/randomising contact</p>

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d) Promotion of codes of conduct taking due account of the existing relevant international standards as well as each country's traditional cultural standards, and regular education, training and supervision of officials to ensure proper understanding of their responsibilities	None	Establishment Division at the federal level and equivalent departments in the provinces	NACS has recommended inclusion of integrity and ethics as major feature of induction program and making it mandatory for each individual to sign off on code of conduct on appointment. Additionally workshops and trainings have been recommended to regularly reinforce ethics systems.
e) Measures which ensure that officials report acts of corruption and which protect the safety and professional status of those who do	None	None	NACS calls for developing a whistle blowing mechanism which allows the public to come forward and disclose information on corruption through a system which ensures the credibility of information as well as the confidentiality and security of information provider and recourse mechanism in case of victimization
<b>Accountability and Transparency: Safeguard accountability of public service through effective frameworks, management practices, and auditing procedures through</b>			
a) Measures and systems to promote fiscal transparency	Freedom of Information Act 2002. (scanned document attached as file annexure-VIII.doc)	Department of the Auditor General of Pakistan and Controller General of Accounts	PIFRA addresses all issues of having a system that can ensure fiscal transparency. Financial reporting under PIFRA's New Accounting Model (NAM) is however based on a modified cash system that is intended to move ultimately towards accrual (no time frame available at the moment). The inherent reporting constraints under a cash-based model shall apply till the full accrual model comes into effect. The project 1996-2004 is to be extended as PIFRA-2 beyond 2004.

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b) Adoption of existing relevant international standards and practices for regulation and supervision of financial institutions	New Audit and Accounts Legislation of 2001 (Document available at <a href="http://www.agp.gov.pk">www.agp.gov.pk</a> )	Department of the Auditor General of Pakistan and Controller General of Accounts	
c) Appropriate auditing procedures applicable to public administration and the public sector, and measures and systems to provide timely public reporting on performance and decision making	New Audit and Accounts Legislation of 2001 (Document available at <a href="http://www.agp.gov.pk">www.agp.gov.pk</a> )	Departments of the Auditor General of Pakistan and Controller General of Accounts	Consultants have been engaged under PIFRA to provide for a manual and specialised guidelines to assist the DAGP to conduct certification audits. Major shift from compliance audits to value for money audits reporting on performance of government managers is expected when internal controls are instituted mainly through the institution of CFO that stands approved for implementation.
d) Appropriate transparent procedures for public procurement that promote fair competition and deter corrupt activity, and adequate simplified administration procedures	Public Procurement Regulatory Authority Ordinance, 2002 (Document available at <a href="http://www.ppra.org.pk">www.ppra.org.pk</a> )	Public Procurement Regulatory Authority	A model procurement law is presently being drafted by PPRA. The exercise to re-engineer and re-design new transparent procurement procedures for public procurement are also in hand. PPRA has undertaken a full fledged review of procurement procedures and practices of all public sector agencies
e) Enhancing institutions for public scrutiny and oversight	Constitutional Provisions (Constitution available at <a href="http://www.pakistan.gov.pk/law-ministry">www.pakistan.gov.pk/law-ministry</a> ) Local Government Ordinance, 2001 Police Order, 2002 (Documents available at <a href="http://www.nrb.gov.pk">www.nrb.gov.pk</a> ) Rules of Procedures of National Assembly, 1992 and equivalent rules of procedure for provincial assemblies	Devolution related institutional mechanisms Public Accounts Committee and other Standing Committees of the Parliament Auditor General	In the devolved set up there are monitoring committees at all the tiers of the local governments. These committees are responsible for monitoring the functioning of the offices of the respective tier of the local government and preparing quarterly evaluation reports. These reports, in particular, will contain evaluation of the performance of each office in relation to - (a) Achievement of its targets; (b) Responsiveness to citizens' difficulties;



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	(Documents available at <a href="http://www.pakistan.gov.pk/parliamentary-division">www.pakistan.gov.pk/parliamentary-division</a> )		(c) Efficiency in the delivery of services; and (d) Transparent functioning. Development of appropriate performance benchmarks within the system are an essential pre-condition for effectiveness of the exercise
f) Systems for information availability including on issues such as application processing procedures, funding of political parties and electoral campaigns and expenditure	Political Parties Order, 2002 Conduct of General Elections Order, 2002 Local Government Election Rules, 2001 (Documents available at <a href="http://www.nrb.gov.pk">www.nrb.gov.pk</a> ) Representation of People Act, 1976 Senate Election Act, 1975	Election Commission of Pakistan NRB Reforms.	These Orders and Rules aim at introduction of democratic processes and transparency within the political parties. They provide for annual declaration of assets to the election commission by the members of the legislative assemblies, furthermore all campaign expenditures are also to be declared and their sources reported to the election commission. Parameters for code of conduct during an election campaign have also been defined.
g) Simplification of the regulatory environment by abolishing overlapping, ambiguous or excessive regulations that burden business	Pakistan Telecommunication (re-organization) Act, 1996 (Document available at <a href="http://www.pta.gov.pk">www.pta.gov.pk</a> ) Public Procurement Regulatory Authority Ordinance, 2002. (Document available at <a href="http://www.ppra.org.pk">www.ppra.org.pk</a> )	PPRA, National Electric Power Regulatory Authority (NEPRA), Oil and Gas Regulatory Authority (OGRA), Pakistan Telecommunication Authority (PTA), Pakistan Electronic Media Regulatory Authority (PEMRA), Task Force on deregulation	Development of a simplified regulatory environment has been a declared policy of the government of Pakistan for the last many years. A number of improvements have appeared at the macro level. However, intrusive regulation continues in a number of areas especially by the provincial governments. NACS has called for simplification of the system and reduced intrusions by the government functionaries. Government of the Sindh province has introduced some ground breaking regulatory reforms resulting in simplified taxation procedures and drastic reduction in the number of state functionaries regulating businesses. A typical business entity was previously visited by 27 different functionaries

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			<p>without limit to the number of visits or inspections. The figure has now been reduced to four and all of these four have been mandated to visit on the same day.</p> <p>The Task Force on Deregulation at the Federal level has been assigned to develop recommendations for the provinces as well as the Federal Government.</p>

**Pillar II: Strengthening Anti-bribery Actions and Promoting Integrity in Business Operations**

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Effective Prevention, Investigation and Prosecution: Take effective measures to actively combat bribery by			
a) Ensuring the existence of legislation with dissuasive sanctions which effectively and actively combat the offence of bribery of public officials	National Accountability Ordinance (NAO), 1999 (document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> ) Prevention of Corruption Act, 1947 Pakistan Penal Code, 1860 (Scanned documents attached as file annexure-IX.doc)	NAB Provincial anti corruption establishments	NACS has recommended strengthening of the provincial anti corruption agencies through introduction of a law, which is in line with the stronger NAO 1999.



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b) Ensuring the existence and effective enforcement of anti-money laundering legislation that provide for substantial criminal penalties for the laundering of the proceeds of corruption and crime consistent with the law of each country	None	None(TG)	Draft Anti Money Laundering and Terrorist Financing Law has been prepared in the ministry of finance with the assistance of National Accountability Bureau (NAB) and, Federal Investigation Agency (FIA). The law envisages the development of a financial intelligence unit (FIU) which would coordinate with NAB, FIA and Anti Narcotic Force (ANF) depending on the criminal activity suspected. Corruption related issues will be referred to NAB. Specific penal provisions for money laundering as an offence are a part of the draft law.
c) Ensuring the existence and enforcement of rules to ensure that bribery offences are thoroughly investigated and prosecuted by competent authorities; these authorities should be empowered to order that bank, financial or commercial records be made available or be seized and that bank secrecy be lifted	National Accountability Ordinance, 1999 (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )	National Accountability Bureau (NAB).	National Accountability Ordinance introduced in 1999 provides wide-ranging powers to the investigation agency NAB to call for any information from banks and financial institutions and also freeze accounts where necessary. It is the only legislation in the country today that makes it mandatory on banking officials to report suspicious financial transactions. NACS has called for similar legal powers for the provincial anti corruption agencies. Currently, a draft law to empower the provincial agencies is under preparation.

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<p>d) Strengthening of investigative and prosecutorial capacities by fostering inter-agency co-operation, by ensuring that investigation and prosecution are free from improper influence and have effective means for gathering evidence, by protecting those persons helping the authorities in combating corruption, and by providing appropriate training and financial resources</p>	<p>NAO, 1999 provides security of tenure to Chairman, Deputy Chairman and Prosecutor General Accountability (PGA). Sections 19 and 31 of NAO effectively ensure unhindered access to all possible available evidence. Section 31(E) contains legal provisions under which chairman NAB as well as a judge of the court in which the case is under trial can arrange for protection of the witness (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )</p>	<p>National Accountability Bureau (NAB).</p>	<p>NACS has recommended development of a shared database and improved training for officials of all anti corruption agencies. NAB has embarked upon a program of training specialized investigation officers inducted through a competitive examination for which only university graduates could qualify. This is a qualitative leap from the existing set of investigation officers most of whom belong to the lower ranks of police and FIA with lower education levels and inadequate training. A project to further strengthen NAB's capacity will be initiated in September 2003 with assistance of Asian Development Bank. The project would specifically review the organizational structure and undertake training needs assessment.</p>
<p>d) Strengthening bi- and multilateral co-operation in investigations and other legal proceedings by developing systems which – in accordance with domestic legislation – enhance (i) Effective exchange of information and evidence, (ii) Extradition where expedient, and (iii) Co-operation in searching and discovering of forfeitable assets as well as prompt international seizure and repatriation of these forfeitable assets</p>	<p>Interior Ministry. (i) Under section 21 of the NAO, 1999 Pakistan has entered into bi-lateral MLA's with 26 individual countries. (ii) Bilateral treaties. (iii) No specific legislation.</p>	<p>(i) National Accountability Bureau. Other central authorities where MLA's are processed. (ii) Ministry of Interior. Pakistan also has extradition treaties with 26 countries. (iii) Central Authorities as per respective legislation of the requested states.</p>	<p>Establishment of financial Investigation Unit (FIU) is in the pipeline. Government of Pakistan is a member of Asia Pacific Group (APG). It has also been given the status of an observer by the Egmont Group. However information is being exchanged on an informal basis in a number of jurisdictions to combat corruption, money laundering and terrorist financing. Pakistan has treaties with 26 countries; treaties are being negotiated with other countries. Anti Money laundering law has been drafted and is being scrutinised by the concerned ministries.</p>

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Corporate Responsibility and Accountability : Take effective measures to promote corporation responsibility and accountability on the basis of existing relevant international standards through			
a) Promotion of good corporate governance which would provide for adequate internal company controls such as codes of conduct, the establishment of channels for communication, the protection of employees reporting corruption, and staff training	Companies Ordinance, 1984 Securities and Exchange Commission of Pakistan (SECP) code of corporate governance 2002 (Documents available at <a href="http://www.secp.gov.pk">www.secp.gov.pk</a> )	Securities and Exchange Commission of Pakistan (SECP).	SECP has developed a comprehensive code of corporate governance. The code primarily aims to establish a system whereby the company is directed and controlled in compliance with best practices. It emphasises openness and transparency in corporate affairs and decision-making process. It commits all concerned to take forward the process of improving standards of corporate compliance, disclosure and accountability.
b) The existence and the effective enforcement of legislation to eliminate any indirect support of bribery such as tax deductibility of bribes	Not applicable	Not applicable	Not applicable
c) The existence and thorough implementation of legislation requiring transparent company accounts and providing for effective, proportionate and dissuasive penalties for omissions and falsifications for the purpose of bribing a public official, or hiding such bribery, in respect of the books, records, accounts and financial statements of companies	Schedule IV and V of Companies Ordinance, 1984 Companies (Amendment) Ordinance, 2002 (Documents available at <a href="http://www.secp.gov.pk">www.secp.gov.pk</a> )	Securities and Exchange Commission of Pakistan (SECP).	The ordinance requires that all companies adopt international accounting standards. Sub section 7 of section 230 lays down penalties for false and incorrect statement in any return, report, certificate, balance sheet, profit and loss account, income and expenditure account, offer of shares, application or explanation required for the purpose of any of the provisions of this ordinance or pursuant to an order or direction given under this ordinance.

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d) Review of laws and regulations governing public licenses, government procurement contracts or other public undertakings, so that access to public sector contracts could be denied as a sanction for bribery of public officials	Public Procurement Regulatory Authority Ordinance, 2002 (Document available at <a href="http://www.ppra.org.pk">www.ppra.org.pk</a> )	Public Procurement Regulatory Authority (PPRA).	PPRA is empowered to monitor public procurement contracts and take action as it deems fit to improve governance, transparency, accountability and quality of public procurement. All public procuring agencies are now required to obtain an integrity undertaking for all their purchases over Rs. 50 million from their suppliers.  Issuance of public licenses procedures is not within the purview of PPRA.

### Pillar III: Supporting Active Public Involvement

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Public Discussion of Corruption: Take effective measures to encourage public discussion of the issue of corruption through			
a) Initiation of public awareness campaigns at different levels	Section 33 C of NAO, 1999 (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )	National Accountability Bureau (NAB).	Relevant changes in NAO were made as a result of recommendations made by NACS to include prevention and awareness in the anti corruption tools used by NAB. An awareness campaign to counter the indifference in the society and also to empower it through raised awareness of its rights has been designed and will be launched in September 2003.



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b) Support of non-governmental organisations that promote integrity and combat corruption by, for example, raising awareness of corruption and its costs, mobilising citizen support for clean government, and documenting and reporting cases of corruption	None.	None.	
c) Preparation and/or implementation of education programs aimed at creating an anti-corruption culture	Section 33 C of NAO, 1999 (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )	NAB	NAB is working with Ministry of Education to introduce anti corruption themes in the curriculum at school level. The awareness campaign in general envisages educating the masses on the ills of corruption, how it affects them, and how they can be effective against the menace.
Access to information: Ensure that general public and the media have freedom to receive and impart public information and in particular information on corruption matters in accordance with domestic law and in a manner that would not compromise the operational effectiveness of the administration or, in any other way, be detrimental to the interest of governmental agencies and individuals, through			
a) Establishment of public reporting requirements for justice and other governmental agencies that include disclosure about efforts to promote integrity and accountability and combat corruption	None	None	NACS calls for mandatory requirement for senior officials to undertake formal risk management yearly and report on how they intend to minimize risks of corruption

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b) Implementation of measures providing for a meaningful public right of access to appropriate information	Freedom of Information Act 2002.	All government organizations	Changes in the Rules of Business, 1973 to bring them in conformity with the Freedom of Information Ordinance, 2002 as recommended by NACS.
Public participation: Encourage public participation in anti-corruption activities, in particular through			
a) Co-operative relationships with civil society groups such as chambers of commerce, professional associations, NGOs, labour unions, housing associations, the media, and other organisations	Section 33 C of NAO, 1999 (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )	NAB	The implementation process of NACS includes participation by all stakeholders i.e. public sector, private sector, NGOs, academia, and media
b) Protection of whistleblowers	NAO, 1999 provides for witness protection, which strictly pertains to the physical safety of the witness. There is no legal cover for the whistle blower to protect himself against discrimination and reprisals in the job. There is no recourse available to the individual against adverse action undertaken as a punishment for blowing the whistle. (Document available at <a href="http://www.nab.gov.pk">www.nab.gov.pk</a> )	To the extent of witness protection NAB or the relevant judge are responsible	NACS calls for developing a whistle blowing mechanism, which allows the public to come forward and disclose information on corruption through a system, which ensures the credibility of information as well as the confidentiality and security of information provider and recourse mechanism in case of victimization.
c) Involvement of NGOs in monitoring of public sector programmes and activities			There are a number of NGO's working to document and report cases of corruption in selected areas (BEDARI, Citizen and Police Liaison Committee Karachi, etc). They also aim at raising awareness against corruption but there is no coordinated effort at the national level.

