

Annex [Note verbale reference: CU 2022/264]

1. The secretariat has prepared the following questionnaire as a guide that States parties may wish to use to provide relevant information in line with paragraphs 22 to 24 of resolution 9/1, entitled “Sharm el-Sheikh declaration on strengthening international cooperation in the prevention of and fight against corruption during times of emergencies and crisis response and recovery”, including the provision of information on good practices and challenges concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.
2. States parties may wish to take a broad view of emergencies and crisis response and recovery when responding to this questionnaire. Emergencies and crisis response and recovery may include humanitarian emergencies, natural disasters, conflict and post-conflict contexts, as well as health emergencies such as the COVID-19 pandemic, among others.
3. Collecting the information for this questionnaire may require cooperation by several different agencies/authorities. States parties may wish to send the questionnaire to agencies/authorities particularly involved in response and recovery efforts during times of emergencies, depending on their national system, as it calls for information on preventive anti-corruption measures, law enforcement and international cooperation. Such agencies/authorities may include:
 - Anti-corruption bodies, supreme audit institutions and other oversight bodies, and relevant entities with mandates to prevent and counter corruption;
 - National procurement agencies;
 - National law enforcement authorities;
 - National competent authorities responsible for international cooperation in criminal matters;
 - Development agencies.

Questionnaire

Contact Information

Please provide contact details for potential follow-up questions. Contact details will be treated confidentially.

Country: *Kingdom Of Bahrain*

Please describe (cite and summarize) good practices your country has taken (or is planning to take, together with the related appropriate time frame) concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.

States parties are invited to provide information on experiences, good practices and challenges concerning the following:

I. Understanding corruption risks and typologies during times of emergencies and crisis response and recovery, including transnational elements

1. Has your government assessed corruption risks during emergencies or crisis response and recovery, either through formal risk assessments or other informal means? Please provide details, such as key findings and mitigation plans. Please describe whether any other (existing) risk assessment has been carried out that is relevant to the emergency response (such as sectoral risk assessments in procurement, healthcare, infrastructure, etc) and provide details.

Tender board prior approval is required for emergency purchases.

In 2006, the National Committee for Disaster Management was established, headed by the Chief of Public Security and with representatives from each of the concerned authorities including: the Ministries of Health, Finance, Municipalities Affairs and Urban Planning, Works, and Education, the Civil Aviation Affairs, the Public Authority for the Protection of Marine Resources, Environment and Wildlife, the General Authority for Oil and Gas, and the Electricity and Water Authority. The committee is responsible for the following:

1) Assessing the general situation of public safety and proposing plans, programs, and measures.

2) Suggesting detailed plans and programs to confront disasters and reduce their effects efficiently and effectively.

3) Suggesting and coordinating the tasks of ministries and all other agencies concerned with facing disasters.

4) Proposing requirements and controls to achieve public safety in line with the laws in force in the Kingdom and international standards.

5) Continuously evaluating the general emergency plans and subsidiary plans of the ministries and the competent authorities, and suggesting necessary modifications, improvements, and upgrades.

6) Establishing volunteer teams and following up on their training programs.

7) Cooperating with specialized bodies, institutes, and organizations in the field of disaster and crisis management.

8) Carrying out any work or tasks to face disasters based on a mandate from the Minister of Interior or the Civil Defence Council.

9) Developing a plan for joint exercises and periodically following up on its implementation to face any disaster

The committee meets periodically and submits its reports to the Minister of Interior and the cabinet of the Kingdom of Bahrain to take the necessary actions, if required. During the Covid-19 pandemic, the committee met regularly to ensure the availability of food commodities, medical materials, electricity, water, and other commodities and to reassure the society.

2. Please list the main typologies of corruption (corruption risks) you have identified in your country's emergency or crisis responses and recovery. You may select from the list below, and add any additional risks not listed:

Public Procurement

- Bribery of procurement officials
- Excessive use of non-competitive bidding procedures, including by single or limited source tendering, with limited safeguards
- Improper application of emergency procurement procedures allowing for expedited delivery of goods and services
- Bid-rigging (e.g. use of inflated prices)

No case was observed

Misappropriation of Emergency Relief Funds

- Non-eligible beneficiaries circumventing rules and regulations, including through bribes, to obtain access to relief and support
- Diversion of donations away from intended beneficiaries
- Exploiting international financial assistance related to emergency relief or other types of support (such as donor funding or technical assistance)
- Embezzlement of profit gained from the sale and distribution of emergency supplies
- Manipulation and inflation of claims for economic relief
- Fraudulent billing for the provision of goods and services
- Diversion of donated equipment/supplies to the black market
- Companies hoarding/not discharging support received from the government

No case was observed

Conflicts of Interest

- Conflicts of interest between suppliers and authorities in procurement processes
- Political appointees or persons entrusted with prominent public functions involved in, or the beneficial owners of, companies bailed out by the government or companies involved in procurement processes
- Support packages distributed according to ethnicity and/or political affiliation

No case was observed

Misuse of Information

✓ Use of social media to spread misinformation, undertake fraudulent activities such as phishing, cyber-criminal fraud

Inadequate Reporting/Protection Mechanisms

Inadequate reporting/protection mechanisms for whistle-blowers and witnesses

✓ Restricted ability to report potential corrupt activities

Other Corruption Risks

Extensive use of government emergency powers and regulations, with insufficient controls, consultations and/or guidance

Provision of counterfeit good and supplies

Fraudulent or illicit production of goods, including research

Impeded anti-corruption enforcement actions during emergency and crisis responses due to corruption

Impeded provision of international cooperation (e.g. mutual legal assistance) due to the emergency or crisis due to corruption

✓ Links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering

Please list any other typologies or risks:

3. Did any of the corruption risks (typologies) identified in question 2 entail an international element? For example, fraudulent or collusive procurement practices involving foreign or international bidders or suppliers, donors or international financial institutions; aspects of transnational bribery; diversion of resources, assets or persons across borders)? Please be as specific as possible and provide details and examples. If the information is sensitive, please describe the typology or give anonymized examples.

No case was observed

4. Please describe whether the corruption risks identified in question 2 appear to be longer-term trends. Have they required new or strengthened anti-corruption actions as a result? If so, please elaborate.

The Kingdom of Bahrain periodically takes new measures in line with international standards in promoting integrity and combating corruption, especially with regard to organized and cross-border crime and the connection of corruption crimes with other crimes, confronting electronic fraud through the establishment of specialized units to combat this type of crime, as well as encouraging the public to report potential cases of corruption, and working to develop laws on the protection of whistle-blowers.

5. Please describe any measures taken to support the private sector in identifying and mitigating corruption risks. This may include particular risks associated with supply chains and procurement processes.

There are open communications channels for vendors with tender board. Reconsideration and complains application are open and available in the website and are taken seriously by Tender Board. Tender law addresses these issues especially in article no.56 and 57.

article no.56

Any supplier or contractor claiming, prior to the contract coming into effect, that he has suffered or may suffer a loss or damage because of the buyer's breach of duty imposed by law may request the authority seeking to enter into a contract or the Board, as the case may be, a reconsideration of any of the tendering procedures or any decision related thereto within 10 days from the date of becoming aware of the procedure or decision for local tenders and 20 days for international tenders.

The authority to whom the request is submitted shall adopt a decision in respect thereof within 30 days from the date of its submission.

A decision of refusal shall be substantiated. If no decision is adopted in respect of the request within the aforesaid time limit, this shall be deemed as an implicit rejection thereof.

article no.57

a supplier or contractor may file a complaint with Board in any of the following cases:

- a) If it is impossible to submit a request for reconsideration or its acceptance because of the contract's coming into effect.*
- b) If a decision is adopted for rejection of a request for reconsideration explicitly or implicitly.*
- c) If a decision is adopted or action is taken in respect of the tender but the supplier or contractor is not aware thereof except upon the contract's coming into effect.*

A complaint shall be filed within 10 days in respect of local tenders and 20 days in respect of international tenders from the date of becoming aware of the decision or action.

The Kingdom of Bahrain supports the private sector in identifying and mitigating corruption risks by requiring companies wholly owned by the government to submit their tenders

amounting to 50000 BD or more through the government Tender Board to make the bidding procedures more transparent.

6. Please provide an overview of efforts taken to understand the particular impact corruption in times of emergencies and crisis response and recovery may have on women and marginalized and vulnerable groups. If possible, please include reference to any research, analyses or assessments undertaken in this regard.

The government of Bahrain adopts the principle of “Leave no one Behind” in all its operations, so that vulnerable groups will experience zero special impact during emergencies and crisis response.

During the Covid-19 pandemic, work continued to protect vulnerable groups such as the elderly and children and provide them with service, in addition to granting them and low – income people with social assistance.

The National Report of the Kingdom of Bahrain included the progress made in the implementation of the New Urban Plan (NUA) in Axis No. 1.1.1.3 entitled Promoting the Social Integration of Vulnerable Groups (Women, Youth, the Elderly, People with Disabilities and Expatriates) on many efforts and plans that ensure the support of these groups, which is reflected in their protection from any impact that corruption may lead to such as poverty, limited income, etc.

7. Is there a greater need for international cooperation in responding to corruption risks in the context of emergency and crisis responses than in other situations? Why, or why not?

Of course, there is an urgent need to support international cooperation in this area, especially with regard to the exchange of experiences and the exchange of necessary legal assistance, as well as cooperation on the issue of asset recovery, cross-border crimes and crimes related to corruption crimes such as economic crimes and money laundering, as strengthening international cooperation would contribute to reducing the risks of corruption and help to understand and apply how to deal with emergencies and crises, especially since corruption has significant effects and repercussions on societies if there is no effective control. To shrink it.

II. Addressing corruption during times of emergencies and crisis response and recovery at the domestic level

1. Please describe the anti-corruption controls, safeguards and/or measures put in place to address the corruption risks identified above in question 2. Please highlight any special measures that may have been introduced in response to a particular emergency, and whether those measures may be useful for future crises. These may include anti-corruption task forces, the use of real-time audits, transparency portals and specific reporting channels for reporting corruption in the context of emergencies, including in the areas below.

The Kingdom of Bahrain involves all members of society in the fight against corruption by holding regular national campaigns and via the national anti-corruption hotline, “Nazaha992” which was launched on international anti-corruption day in 2009 , these initiatives are in line with the kingdom’s conviction that corruption presents a major obstacle to the development, financing , and the quality of public services.

The Ministry of Interior’s General Directorate of anti-corruption and Economic and electronic security remains committed to partnering with the community in the fight against crime and corruption.

The anti-corruption hotline serves as a bridge between civil society and Ministry of Interior, which, along with other authorities, helps to minimize and expose illegal practices.

The hotline encourages the public to report suspected cases of corruption while discouraging potential offenders and assuring everyone that the authorities take all issues seriously.

The public can also rest assured that all necessary measures are in place to ensure the confidentiality of the information and to protect the identities of whistle-blowers.

The General Directorate of Anti-Corruption and Electronic Security actively exposes cybercrimes and investigates reports received via the Direct Reporting form.

The Bahrain Supreme Audit Institution, the National Audit office (NAO) has its own channel for gathering complains from any entity/person to uncover financial and administrative violations in the entities audited by the NAO.

The complaints will be examined and necessary action will be taken. It should be noted that the NAO is an independent body.

There are also channels and web pages to report suspicions of corruption to protect information and protect whistleblowers.

Public procurement and the management of public finances

2. Please describe measures taken to develop and/or further strengthen accountability and transparency in public procurement during times of emergencies and crisis response and recovery. These may include:
 - The development of specific guidelines, circulars or memorandums for procurement in emergency contexts;
 - The development of new codes of conduct or guidelines for procurement personnel during times of emergencies and crisis response and recovery;
 - Requirements to disclose potential and real conflicts of interest;
 - Reforms of legal, regulatory and policy frameworks governing public procurement;
 - Requirements to collect and publish the beneficial ownership information of entities contracting with the government;
 - Requirements to cross-check information available on the ultimate beneficial owners of companies involved in procurement processes;
 - Publication of information on the whole procurement cycle, from tender to delivery (including type and amount of contract, reference information for the awarded company, beneficial ownership information, validation of delivery, etc.);
 - Specific labels or “tags” for procurement contracts to facilitate the monitoring of contracts associated with a particular emergency or crisis;
 - Measures to ensure procurement in emergency contexts have appropriate oversight and sanctions, including the potential disqualification of companies;
 - Measures to help ensure that compliance programmes and safeguards are in place for bidders;
 - The use of online portals that afford opportunities to track procurement contracts through the whole procurement cycle;

- Feedback mechanisms for monitoring by groups outside the public sector, such as civil society organizations.

Bahrain Tender Law cover all emergency purchases; refer to tender law articles no.50, Contracts may be entered into by way of direct purchase in any of the following cases:

- a) If the goods, constructions or services are not available except with a certain supplier or contractor and there is no acceptable substitute.*
- b) Emergency cases that do not allow following the tendering procedures of all their kinds or competitive negotiation.*
- c) In cases of disasters and urgent necessity that cause an urgent need for goods, constructions or services where it is not likely to allow following the public tendering procedures.*
- d) In cases of standardization or compatibility with the available goods, equipment, technology or services while taking into account the limitation of proposed purchase as compared with the original purchase, suitability of the price and unsuitability of the substitute.*
- e) In cases of purchase for research, experimentation, study or development.*

3. Please highlight 2-3 good practices and challenges faced when developing, implementing and/or monitoring the measures you have identified in question 2.

Tender Law follows good practice of control and supervision of tender limits and tendering process, purchasing authorities (Ministries) can go for direct purchases of limit 3000 BD, more than 3000 BD and till 10000, three quotations are required, more than 10000 BD till 25000 BD in should be a tender process with full supervision on BTB. Article no.11 and tender board decision no.1 for 2015.

Good Practices :

- Effective legislation and laws regulating public procurement operations.*
- Cartoon channels for bidding.*

Challenges:

- No obstacles or challenges have been identified in this area.*

4. Were internal audit systems, real-time audit mechanisms and/or other mechanisms used to help monitor and oversee the management of public resources during times of emergencies and crisis response and recovery? If so, please describe. Please provide any information on good practices and/or lessons learned.

The role of tender board is to control and supervise all purchasing including emergency purchases prior to awarding contracts.

In addition, the Financial and Administrative Audit Bureau in the Kingdom of Bahrain is working on the issue of control, auditing and the necessary financial and administrative analysis procedures to monitor any irregularities that may lead to suspicions of corruption or corruption in the public sector and may be related to the private sector.

These reports are published annually and periodically to the public, and the observations contained in the report are transmitted to the competent authorities by the Coordination Committee headed by the Crown Prince.

5. Please describe what measures or initiatives could be used/have been used to help ensure transparency in the allocation, use, distribution and management of the national budget during times of emergencies and crisis response and recovery. These may include dedicated budget lines, measures to present budget items, public hearings or rendering such information accessible to the public.

This is ministry of finance and national economy role.

The Constitution of the Kingdom of Bahrain and the laws related to the national budget and the laws related to the Ministry of Finance and National Economy have organized this process in all transparency and made it available to the public through many official platforms such as the official website of these authorities or the e-government or even the official website for Fatwa and Legislation, in addition to that, the Shura Council and Parliament in The Kingdom of Bahrain reviews and approves or rejects the budget, and the matter is broadcast through all media channels, especially that there are specialized committees in this Council that work on analyzing the national budget and all its items, and of course, the House of Representatives represents the voice of the Bahraini people.

Inter-institutional coordination at the national level

6. Please outline measures which could be taken or have been taken to enhance coordination among institutions at the national level involved in response and recovery efforts, such as Memorandums of Understanding, data sharing agreements, standard operating procedures or other formal and informal mechanisms that enable institutions to share information and respond in a coordinated manner to corruption risks in the context of emergencies.

The National Committee for Disaster Management was established in 2006, headed by the chief of public Security and with representatives from each of the concerned authorities. Its main objective is to coordinate between the relevant authorities and unify their efforts.

Transparency measures, including access to information

7. Does the government have specific measures in place to identify individuals who may be involved in, or who help facilitate, corrupt acts? Such measures may include requirements to disclose beneficial ownership information and requirements to make such information accessible to law enforcement or other authorities. For example, information contained in beneficial ownership registries or information contained in open tender portals may be used by supreme audit institutions and other oversight bodies to audit, and inform, response and recovery measures.

Yes, the Kingdom of Bahrain has issued many legislations and laws that limit illicit enrichment. On this basis and precisely, Law No. 32 of 2010 was enacted regarding disclosure of financial disclosure and the amendments contained therein, which is subject to this law many groups in the country to submit declarations of their financial assets Their minor children will be discharged periodically, as well as the establishment of a body called the Financial Disclosure

Examination Board that follows the Supreme Judicial Council, and in 2022 the manual forms were replaced with electronic forms submitted directly from the subject of this law to the concerned authority smoothly and easily.

This law included in its fifth article regarding the examination of financial disclosure declarations:

In order to examine financial disclosure declarations and investigate complaints related to them, a body may request from the competent administrative authorities, institutions, banks and companies all data, clarifications and documents, including confidential data if it deems it necessary to complete the elements of the financial disclosure. The Authority may seek the assistance of the Financial Supervision Bureau or other administrative authorities or judicial officers in matters necessary for examination or investigation of complaints.

Sixth Article

The Authority shall prepare a report for each obligee who is unable to establish evidence that the increase in his financial liability or ([3]) in the liability of his minor children resulted from legitimate gain. Report to the Public Prosecution.

Any money obtained by a person subject to the provisions of this law for himself or for others due to the exploitation of a position or capacity or as a result of behavior contrary to the provisions of the law shall be considered illegal gain.

Any increase in the wealth of the obligee (4) and his minor children, that occurs after the obligee takes over the job or acquires the capacity, if it is not commensurate with his resources and he is unable to prove a legitimate source for it, is considered as a result of exploiting the position or capacity or behavior in violation of the law.

The criminal case in the crime of illicit gain shall expire with the lapse of three years starting from the date of the obligor submitting the financial disclosure declaration after leaving the position or position, unless the investigation begins before that. It also cuts the time to take investigation procedures during it.

As for the general staff, the Kingdom of Bahrain has limited service jobs that may be subject to corrupt practices if dealing through technology to reduce corruption opportunities.

8. How does the government ensure that emergency measures are limited in duration and scope? Please describe any measures taken to mitigate the use of broad emergency executive authority, such as legislative oversight, regular reports to committees, and review and monitoring mechanisms.

.The Kingdom of Bahrain works through effective strategic plans to deal with emergencies and crises through the specialized committees in any field, and works to activate these plans in an orderly manner and within a timetable that contains an assessment of the progress made, and perhaps dealing with the Corona pandemic was the greatest evidence of the Kingdom of Bahrain's ability Dealing with emergencies and crises distinctly.

9. Have your authorities applied or strengthened whistle-blower protection or reporting systems, including those that afford opportunities for confidential and/or anonymous reports, and how to address such reports?

The Kingdom of Bahrain involves all members of society in the fight against corruption by holding regular national campaigns and via the national anti-corruption hotline, (Nazaha992). The anti-corruption hotline serves as a bridge between civil society and the Ministry of Interior, which, along with other authorities, helps to minimize and expose illegal practices. The hotline encourages the public to report suspected cases of corruption while discouraging potential offenders and assuring everyone that the authorities take all issues seriously. The public can also rest assured that all necessary measures are in place to ensure the confidentiality of information and to protect the identities of whistleblowers

The Bahrain Supreme Audit Institution, the National Audit Office (NAO) has its own channel for gathering complaints from any entity/person to uncover financial and administrative violations in the entities audited by the NAO. The complaints will be examined and necessary action will be taken. The complainer can also rest assured that all necessary measures are in place to ensure the confidentiality of the information and to protect the identities of whistleblowers

In addition, the laws in the Kingdom of Bahrain are based on ensuring the protection of whistleblowers and the protection of their personal information.

As for dealing with these reports, the concerned authority (the General Department of Anti-Corruption and Economic and Electronic Security receives the report through any channel it has received, and then analyzes the report, and works to collect inferences, and in the event that the communication is complete in all respects and constitutes a suspicious case Corruption is dealt with according to the case, and if necessary, it is possible to prepare an ambush and search for the location of the corruption incident and related papers and documents, and thus conduct the necessary investigations and refer the case to the Public Prosecution to take its procedures according to the system.

Use of information and communication technology tools

10. Has the government used information and communication technology tools to build, implement and/or maintain resilient emergency response systems? If yes, please explain what types of tools have been used and include relevant links, if possible.

Yes, by providing many services through the e-government website, as well as shifting work during the Corona pandemic to remote work using modern technology and the Internet, as well as providing many direct communication channels from the individual to the government entity to limit the spread of the virus, even if the person Sometimes a patient does not need to go to the clinic. He can communicate with the doctor by phone and prescribe treatment for him and deliver the necessary medicines to him.

11. If possible, please describe the benefits and challenges of using the tools identified in 10?

The benefits are represented in the ability to deal with crises and gain experience in that, and to exploit technology effectively, which has reduced opportunities for corruption and even contributed to reducing the negative effects and repercussions that may affect society in the absence of electronic channels that may help the individual to cover his needs and obtain access to Services that save him time and effort.

As for the challenges, no clear and direct challenges have been faced in this regard.

12. Has the government used information and communication technology to help manage and oversee public procurement during times of emergencies? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

Yes, floating tenders and bid opening operations are processed through tender board E-tendering system.

[Tender Board - Kingdom of Bahrain](#)

13. Has the government used information and communication technology to promote transparency in the management of public finances during times of emergencies and crisis response and recovery? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

This is Ministry of finance and national economy role

The official media platforms and social networking sites, as well as the official website of the Ministry of Finance and National Economy, had a role in disseminating all matters related to the national budget and aspects of spending and what is related to it.

Engagement of actors outside the public sector

14. If possible, please provide an overview of how the government has partnered with, or encouraged the participation of, actors outside the public sector to help monitor and support oversight of government actions during times of emergencies and crisis response and recovery. Please also include any future initiatives planned.

The government has encouraged the participation of people outside the public sector to help monitor and support government action at all times and in times of emergency and crisis. Bahrain launched The National Suggestion & Complaint system "Tawasul", which is one of the essential eChannels that enables citizens and residents to submit their suggestions and complaints to any government entity in the Kingdom of Bahrain easily at any time and from anywhere. Every government entity in Tawasul has assigned a dedicated team to handle the suggestions and complaints according to a pre-set performance indicator and timeframe based on the case category

15. Are there any policies or initiatives that particularly facilitated the engagement of actors outside the public sector in these contexts? If yes, please describe.

Please review the answer in the previous question

III. Responding to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. If possible, please provide examples of detected or suspected instances of domestic or transnational corruption and how these were identified in your country. If the information is sensitive, please describe the typology or give anonymized examples.

Some cases through whistleblowers through various channels, whether the national hotline 992, or through research and investigation, or even through reports of the Office of Financial and Administrative Oversight, which have criminal suspicions

2. How did the government respond? Has your country taken any steps to identify, investigate or prosecute corruption in emergency and crisis responses and recovery? Examples may include an interagency cooperation taskforce among anti-corruption authorities, analysis of suspicious transaction or financial disclosure reports, greater cooperation across international borders, strengthening investigation and prosecution capacity, etc.

Of course, there was cooperation between the anti-corruption authorities, the Financial Intelligence Units and Interpol in order to analyze suspicious data, documents and financial reports, to prove or deny the accusation and transfer it to the Public Prosecution if all the corners of the case were proven.

3. In its response, did your authorities find it necessary to seek or request international cooperation (e.g. mutual legal assistance or direct law enforcement cooperation)? Please provide details and examples. How effective do you believe the cooperation was, and what were the main challenges? Was the assistance provided, were there any obstacles?

This kind of issue has not been dealt with

4. Has your government received any requests for international cooperation from other countries seeking to identify, investigate or prosecute corruption during times of emergencies and crisis response and recovery? Please provide details and examples. How effective do you believe your authorities cooperated, and what were the main challenges? Was the assistance provided, were there any obstacles?

This kind of issue has not been dealt with

IV. Mechanisms to respond to corruption during times of emergencies and crisis response and recovery through international cooperation

1. Have your authorities had any practical experience in sharing information, including spontaneously, with authorities in other countries concerning suspected corruption in the context of emergency or crisis responses?

This kind of issue has not been dealt with

2. Has your government used electronic communication channels or networks, including those of INTERPOL or the GlobE Network, that enable the prompt exchange of information for the investigation and prosecution of corruption offences in the context of emergency and crisis responses?

This kind of issue has not been dealt with

3. Are you aware of any examples of joint or parallel investigations or the bilateral sharing of capacity and expertise on investigating and prosecuting corruption in this context?

The committee of specialists in the entities responsible for protecting integrity and fighting corruption in the countries of the cooperation Council for the Arab States of the Gulf discussed in July 2022 a draft guide on the employment of technology in combating corruption in Gulf Cooperation Council countries, and a draft guide on examining complaints and communications in the fight against corruption in the Gulf Cooperation Council Countries.

4. Have you taken additional measures to analyse asset declarations, financial disclosures and/or suspicious transaction reports during times of emergencies or crisis response and recovery?

This kind of issue has not been dealt with

5. Have you experienced challenges in accessing adequate, accurate and up-to-date information on the beneficial ownership and control of legal persons in other jurisdictions? In your view, what may be improved to enable effective, timely access to such information?

This kind of issue has not been dealt with

6. Have you experienced challenges in verifying assets beneficially owned by public officials abroad? In your view, what may be improved to enable effective, timely access to such information?

This can be done by taking advantage of diplomatic channels or through the Interpol network and the Saudi Global Network.

7. Have there been any efforts to support anti-corruption practitioners and law enforcement authorities in your country, including human resources management and opportunities for capacity-building and peer-learning on methods, tools and technologies for countering corruption in the context of emergency and crisis responses?

Of course, there were many efforts in this regard, as workers in the field of anti-corruption were enrolled in many specialized training courses to support their skills and improve job performance.

8. In your view, are there any unique aspects of requesting or providing international cooperation in emergency and crises responses as opposed to regular cases?

The system of the Kingdom of Bahrain is very flexible and welcomes any international or regional cooperation at the same pace as responding to emergencies and crises out of the principle of commitment and determination to control any problem that may occur in this regard.

9. Does your government have any experience in receiving or providing international financial assistance (such as donor funding or technical assistance) to address emergency situations? In your view, what are effective mechanisms to strengthen integrity and prevent corruption in the provision of emergency relief funds? What should be improved?

These cases have not previously been handled

V. Effectiveness of international frameworks to respond to corruption during times of emergencies and crisis response and recovery, including through international cooperation

1. Are there any longer-term trends related to addressing corruption in emergency and crisis responses that require a new or improved anti-corruption approach in the future? Or that require greater international cooperation or new ways of working together? Please explain.

Strengthening direct international cooperation between countries that really need assistance, whether in legal or criminal assistance or the exchange of experiences.

2. Are there any measures or processes that you would consider good practices to facilitate international cooperation and rapid exchange of information in emergency and crisis situations? Examples could include measures to accept electronic copies of mutual legal assistance requests and prioritize requests concerning corruption during times of emergencies and crisis response and recovery. Has your country had any experience in this regard?

There was no previous case, but electronic channels are a good solution in this field, especially diplomatic channels.

3. How should countries strengthen collaboration to address corruption risks arising in emergency and crisis situations, with respect to international cooperation? Please list up to three measures countries could apply that would strengthen international cooperation in this regard.
- 4.

To have a unified guideline as much as possible, or even for each country to have a guideline in line with its national laws and public policy, that includes all methods of communication with the country formally and the requirements of this communication for international cooperation and the quality of this cooperation and its publication on the United Nations website on drugs and crime to be a reference for all A country that would like there to be international cooperation with another country, and it may be ignorant of the official channels that it is possible to communicate with to promote this cooperation.

5. Have there been any efforts by your government to enhance cooperation with multilateral, international or regional bodies to address corruption and other forms of crime during times of emergencies and crisis response and recovery?

The Kingdom of Bahrain is a country that is open to the international community, welcomes, and seeks to extend bridges of cooperation and participation of the international community in addressing its urgent issues. Indeed, it devotes efforts to eradicate corruption crimes, linking its national efforts to international efforts in this regard and dealing with international and regional bodies and organizations to address these crimes. Perhaps the most prominent Bodies that the Kingdom of Bahrain deals with in this regard, the United Nations Office on Drugs and Crime, the General Secretariat of the Arab States and the General Secretariat of the Gulf Cooperation Council

VI. Data collection

1. Have your authorities collected data or statistics to track and analyse trends concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery. Are these publicly available?

All data, statistics and information are available through the official media channels and social networking sites are available to the public as well as on the official websites of the concerned authorities.

2. Have your authorities collected data or statistics to track and analyse trends and links between corruption and other forms of crime? Are these publicly available?

Yes, all data, information and studies related to this are available to the public through official channels.

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 23 of resolution 9/1, as well as any challenges faced or technical assistance required.

Please describe (cite and summarize) measures/steps your country has taken, if any (or is planning to take, together with the related appropriate time frame) to explore and enhance knowledge of the links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering, including during times of emergencies and crisis response.

States parties are invited to respond to the following questions:

I. Analyses and assessments to explore and enhance knowledge of the links between corruption and other forms of crime

1. Has your government undertaken any analyses or assessments to better understand the links between corruption and other forms of crime, including typologies of crime and how corruption may be used to facilitate and enable organized crime?

Yes, through analytical research and study of crime and its links with other crimes and the relationship of corruption crimes to organized crime for a greater understanding of the nature of corruption crimes and how they relate to other crimes, which is reflected in the strengthening of measures to curb corruption crimes and prevent their association with other crimes

2. *Has your government taken any measures to strengthen legal, regulatory and policy frameworks that recognize how corruption and other forms of crime may be linked and that call for coordinated anti-corruption action?*

There are many legislations and laws that deal with corruption crimes and related crimes such as economic crimes and money laundering crimes and the penalties that may affect the perpetrators, which also regulate the work of the concerned authorities and how to deal with these crimes.

3. Does your country's national risk assessment or other policy framework to prevent and combat money laundering recognize and address the risk of laundering of proceeds of corruption and other economic crime?

The National ML/TF Risk Assessment of the Kingdom of Bahrain has been conducted as a self assessment by Bahrain Authorities, using the National Money Laundering and Terrorist Financing Risk Assessment Tool that has been developed and provided by the World Bank.

The Kingdom also aims to maintain an up-to date risk assessment that will reflect any changes to ML/TF existing or evolving risks and threats. Therefore, the NRA process is presently reflected as part of the National Policy Committee's mandate, a committee responsible for the formation and management of AML/CFT related policies.

Money laundering offence is comprehensively defined in the Kingdom of Bahrain's law. There is no statute of limitations for offences of money-laundering. In addition, asset forfeiture laws in the Kingdom of Bahrain provide competent and relevant authorities with the legal basis and framework to identify and trace proceeds or property.

In 2018, the Kingdom's first NRA report was adopted by the Council of Ministers, and thus enforcing

its findings throughout the workings of the government.

The Kingdom of Bahrain underwent its second formal and comprehensive National Risk Assessment (NRA). The assessment period covers the years 2017 to 2020. By virtue of its membership in both the MENAFATF and the FATF (as part of the GCC collective membership). Bahrain is fully committed to the implementation of the FATF standards. Therefore, Bahrain has initiated a wide scope national risk assessment to evaluate the Kingdom's exposure to ML/TF risk and it still does as it is updating the NRA yearly.

Corruption is a designated predicate offence as per the AML Law and the Kingdom's Penal Code. It is deemed to pose a medium threat to ML offences. A significant portion of the Corruption cases in the Kingdom refer to what is identified as 'administrative violations/corruption' and 'misuse of public funds' which in nature do not involve the transfer of possession of funds, but are rather limited to the calculation of financial harm estimated that was caused by administrative decisions, Nevertheless, financial related corruption is identified as a moderate threat. Cooperation with the competent authorities is continuous; intelligence on all corruption cases with links to ML is to be shared with the relevant authorities.

II. Specific mitigation measures to address corruption and other forms of crime during times of emergencies and crisis response and recovery

1. Have your country's authorities undertaken any investigations into unfair commercial practices, such as price-gouging and the manipulation of prices of essential goods and services, or bids, or abuse in the allocation, distribution, use and management of relief and recovery funds? Have your country's authorities undertaken any investigations into corruption during times of emergencies and crisis response and recovery, such as bribery of procurement or other public officials, embezzlement of profits, diversion of resources and conflicts of interest? Have any measures been applied to freeze and seize related proceeds of crime?

This is the role of ministry of commerce and ministry of interior, tender law addresses prohibited practices in article no.65 ,

It shall be prohibited for a supplier or contractor to do any of the following acts:

- A) To influence the results of the tender or award decision with the aim of overcoming competition such as giving bribes and incentives to any officer in the buyer, Board or any government authority.*
- B) To obtain information about the tender by unlawful methods.*
- C) To connive with contracts or suppliers participating in the tender.*
- D) To engage in any practice leading to a monopoly.*

Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 22 of resolution 9/1, as well as any challenges faced or technical assistance required.