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## HAITI REPPORT

### Follow-up on the Lima Agreement

### Citizen Corruption Observatory (CCO)

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Country: Haiti — Local Partner: FINESTE



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*This project is possible thanks to the support of the Office of Hemispherical Western Matters of the Department of State of the United States.*

*This document was funded by a grant from The United States Department of State. These opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of The United States Department of State.*



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## Acronyms Used in this Document

CCO = Corruption Citizen Observatory

LACND: Latin American and Caribbean Network for Democracy

CFA = Citizen Forum of the Americas

CSPSA = Civil Society Participation in the Summit of the Americas

CSO = Civil Society Organization

OAS = Organization of American States

NGO = Non-Governmental Organization

FINESTE = Forum Intégré pour l'Éducation et la Stabilité Économique



## Introduction

The main purpose of the project titled “Citizen Corruption Observatory (CCO) - Follow-up on the Lima Agreement” is to strengthen the Citizen Forum of the Americas (CFA) by co-creating, together with the Latin American and Caribbean Network for Democracy (REDLAD, by its Spanish initials) and the Citizen Forum of the Americas (CFA), an observatory that provides technical support to the implementation of the Project titled “Civil Society Participation in the Summit of the Americas” (PASCA, by its Spanish initials). Within the framework of the activities developed by the CCO, the progress of the Lima Agreement was monitored using a methodology that took into account both policy and practical developments, and which was based on the participatory discussion of different civil society organizations in each of the 19 countries participating in this process.

In this context, the CCO is made up of a coalition of civil society organizations and social actors of the continent, created to follow up on compliance with the agreements adopted by the governments of the hemisphere at the 8<sup>th</sup> Summit of the Americas held in 2018 in Lima, Peru. The Lima Agreement, “Governance against Corruption”, a document resulting from the Summit, provided an opportunity to endorse and ratify previous international commitments on anti-corruption issues.

In that regard, the country report aims to present a summary of the results and conclusions regarding monitoring of progress and/or fulfillment in Haiti, of the agreements made at the Summit in 2018, based on the methodology document used to monitor the Lima Agreement<sup>1</sup> and the review of this information carried out by 3 civil society organizations. Full information on this report and its monitoring framework is available at the CCO’s website<sup>2</sup>.

The methodology for monitoring the Lima Agreement allows civil society to assess the progress and/or compliance with 19 agreements prioritized<sup>3</sup> by the CCO used for monitoring in each of the countries participating in this observatory. The follow-up is based on the review made in developments at both the policy and practical levels conducted by national governments over the last two years in respect to agreements agreed upon to fight corruption.

At the policy level, current regulations were reviewed, based on 75 guiding questions regarding constitutional, legislative and jurisprudential developments. The analysis of practice consists of the review of concrete measures taken by the government in response to the agreements made. For this purpose, 64 questions were asked, which were answered through requests for information, interviews, reference to announcements made by the media, reports and advanced research on the subject, among others. This information is the basis for evaluating each agreement in terms of effectiveness, efficiency and sustainability<sup>4</sup>.

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<sup>1</sup> For further information on the methodology please visit: <https://occ-america.com/metodologia/>

<sup>2</sup> Please visit: <https://occ-america.com/>

<sup>3</sup> The 19 commitments were prioritized considering the possibility of a comparative analysis in all CCO countries participating.

<sup>4</sup> We shall take a more detailed look at the report later, including the methods that led to this assessment.





## Civil Society Organizations

### Forum Intégré pour l'Education et Stabilité Économique (FINESTE)



FINESTE - focal point of the Citizen Forum of the Americas in Haiti- is a civil social organization aimed at promoting, preserving and advocating for human rights, sustainable development, fight against corruption, democracy, education promotion, as well as the social and solidarity economy. This includes, among others, freedom of expression, access to public information, and participation of youth in public politics in Haiti. To that end, FINESTE, together with the Organization of American States (OAS), direct the development of an anti-corruption hub in Haiti, as well as through several national networks and platforms aimed at fighting corruption in the country.

As regards monitoring of the Lima Agreement, it has been decided that a three-member FINESTE team will coordinate and provide general guidelines to draft the report. The coordination team is comprised by Wilbert St Fort, FINESTE's General Coordinator; Caleb Gérard, Assistant Coordinator; and William Nicolas Pierre, liaison between the team and the Proetica leaders. In addition, the latter oversees the work of two individuals tasked with collecting data to fill out the forms, and makes sure that the Organizations meets the scheduled deadlines and the financing standards.

In this regard, the national coordination team played a vital role in the management and mediation that allowed mapping of key actors as requested by Proetica, filling of forms, publication of data, creation of Excel files, among others.

### Groupe de Recherche en Appui à la Justice et aux Droits Humains (GRAJUDH)



This research group was founded in 2019 with the mission of advocating for the human rights and the furtherance of the rule of law through civic and citizenship education. Thus, this group is focused on youth participation and technical education on the fight against corruption. In addition, GRAJUDH aims at supporting the Haitian justice, especially in terms of women's and children's rights and specific actions to reduce discrimination and human rights violations for these specific groups. To that end, GRAJUDH has organized training programs for lawyers and judges on said subjects.

### Observatoire National pour la Democratie et l'Environnement (ONADE)



ONADE is a non-profit organization aimed at promoting and advocating for human rights in Haiti through the accompaniment and reinforcement of the civil society capacity to defend their own rights. Likewise, ONADE promotes sustainable development, environmental protection, and social



stability. Therefore, they deliver lectures at educational institutions in order to raise awareness among the youth regarding their responsibilities in protecting the environment and becoming involved in democracy. Additionally, ONADE works on promoting gender equity, peace and social justice in the country.

## Haitian National Context

In order to fully understand the problem of corruption in Haiti and the difficulties in laying the groundwork for a strategy to fight this scourge, this issue needs to be placed in the historical context of the Haitian political and social system.

There are four main causes behind the continuation of this phenomenon in the country: the first is related to the poor working conditions in the public service, failure to recognize merit, and the recurrent nepotism practices; the second is associated with the excessive centralization of the Public Administration and the inefficient provision of public services to users; the third is linked to the lack of transparency in the State affairs, the lack of accountability on the part of managers of public funds, and failure to regulate access to public information; and, the fourth is the weakness and dependence of the judicial system, the lack of enforcement of legal provisions against corruption and impunity.

This scenario can be seen, for example, in the diagnostic survey on governance carried out in 2005 by the Office of Research in Computing and Economic and Social Development (BRIESD), with the purpose of identifying the particular groups and sectors at a high risk of corruption vulnerability and exposure. In this regard, 93% of the survey respondents said that they had been exposed to corruption and found the phenomenon to be a very serious problem. In addition, their level of confidence in the government's capability to reduce these problems is generally low, since more than 70% of respondents claimed that the leaders would rule in their own interests rather than in the common interest (OAS, 2007).

Moreover, this country is not perceived in a very positive light at the international level. According to Transparency International's 2018 and 2020 Corruption Perception Index (CPI) Reports, Haiti is ranked among the countries perceived as the most corrupt, with a score of 18 out of 100, ranking 168 and 170, respectively.

Today, it is undeniable that corruption affects all parts of the State through its different forms: active and passive bribery, illicit enrichment, money laundering from economic crimes, abuse of office, influence peddling, misappropriation, tax evasion, overcharging of services to the State, undercharging of royalties to the State, embezzlement, nepotism, illegal awarding of public contracts, among others. Some of these acts are punishable by criminal law, but others are yet to be criminalized.

Whatever form it takes, corruption is an obstacle to the country's socio-economic development and to the establishment of the rule of law, undermines citizens' confidence in public institutions, projects a negative image of the country abroad, and discourages both domestic and foreign private investors. It distorts the rules of the democratic system and the market economy and is costly for society.



While government publicly displays its determination to eradicate corruption, it is more important than ever to give credibility to this determination by establishing a coherent reference framework for the fight against corruption, knowing that the measures and sanctions practiced in this area are limited. Given the general awareness of the need to fight against corruption, the recommendations and conclusions formulated during the workshops organized by the ULCC with different administrations, institutions and public groups, have made it possible to provide elements for a corruption prevention and suppression policy. This strategic anti-corruption plan, which is the result of a meeting between the public and private sectors and civil society, is an attempt to respond to the effects of corruption.

### COVID-19, a Dual Threat for Developing Countries: The Haiti Case.

Sustaining the fight against corruption during the response to the COVID-19 pandemic is essential. Implementing procedures and systems to account for decisions and actions will ensure that development assistance is delivered to those most in need. Given the current situation, we are already witnessing a spate of corruption-related incidents that undermine transparency and accountability efforts, and they evidence the need for continued support for these efforts.

The COVID-19 crisis is pushing the government of Jovenel Moïse to take steps to combat it, bypassing the standard processes that avoid the risk of corruption. At first, the Haitian government used COVID-19 as a repression tool to prevent CSOs from demonstrating against acts of corruption. Then, according to the 2020 COVID Report, we also saw a sharp rise in corruption, and while almost all of the funds were diverted in response to Covid-19, according to the same report, the Haitian state's response to COVID-19 has been ineffective. (United Nations. 2020).

#### National Outcome

As a result of the Eighth Summit of the Americas, a process in which the Citizen Forum of the Americas had an active participation, the countries of the region signed the Lima Agreement, entitled "Democratic Governance against Corruption", which established 57 commitments, in order for member states to implement concrete actions to build citizens' trust in institutions, and reduce the negative impact of corruption on the effective enjoyment of human rights and the sustainable development of the peoples in the American hemisphere.

To follow up on the implementation of the Lima Summit commitments, 19 of the 57 commitments were selected based on four criteria: (i) Commitments that could be sustained over time; (ii) commitments that have greater potential for institutionalization; (iii) commitments that incorporate new approaches into anti-corruption actions; and (iv) commitments that consider the perspective of the population in classified vulnerable conditions. These 19 commitments are grouped into 5 specific themes:

- A. Reinforcement of Democratic Governance.
- B. Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression.



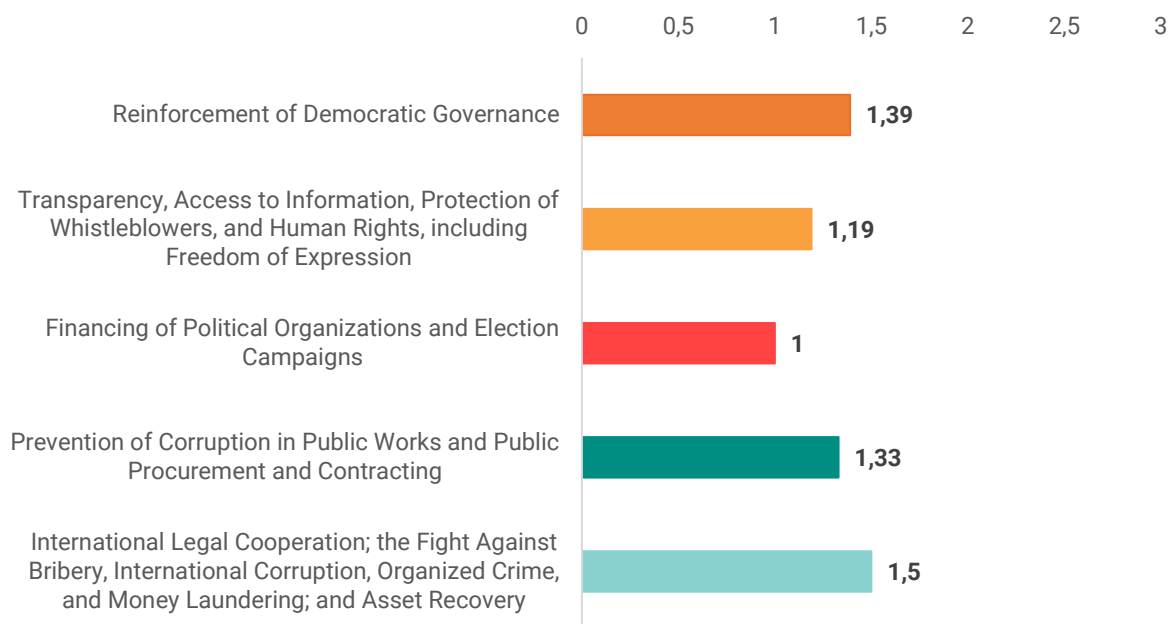
- C. Financing of Political Organizations and Election Campaigns.
- D. Prevention of Corruption in Public Works and Public Procurement and Contracting.
- E. International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery.

These commitments were analyzed by identifying policy and practical developments, which were rated on a scale of 0 to 3, taking into account the follow-up criteria below:<sup>5</sup>

- **Effectiveness:** This establishes to what extent the actions developed by the government as a result of the Lima Agreement contribute to the fight against corruption in the country.
- **Relevance:** This establishes to what extent the actions developed by the government are timely, convenient and appropriate according to the country's economic, institutional and/or social context.
- **Sustainability:** This determines to what extent the actions carried out to fulfill the commitment will have continuity over time.

Graph 1 below presents the overall results for Haiti in the five themes in which the commitments are classified:

**Graph 1. Outcomes per Lima Agreement Area**



Score Not register= 0 Low= 1 Medium= 2 High= 3  
Own graph, based on the data collected by the CSOs involved in the CCO platform

- The Organizations' follow-up shows that none of the topics reached the average in the monitoring, attesting both to the absence of regulatory developments adapted to the

<sup>5</sup> Assessed in a scale of 0 to 3, where 0= not register, 1= low, 2 = medium, and 3 = high

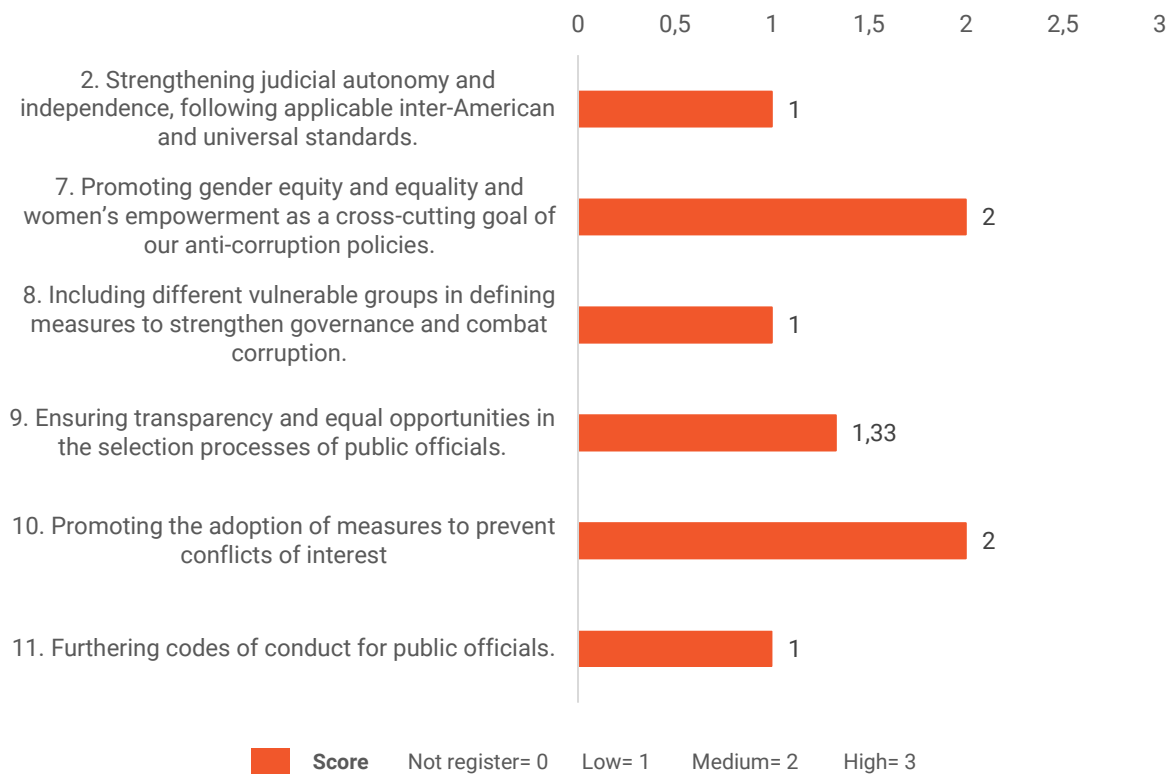


analyzed commitments, and to the weakness of the programs planned by the national government in the fight against corruption.

- The topic of International Legal Cooperation (fighting the practice of bribery) received the highest score in the follow-up (1.5/3.0), which highlights the coordination of judicial authorities in identifying, investigating and punishing acts of corruption.
- However, the topic of political and campaign financing received the lowest score (1.0/3.0), which shows the contrast between the campaign accountability system and its lack of publicity.

## 1. Reinforcement of Democratic Governance

Graph 2. Results for Commitments related to the Reinforcement of Democratic Governance.



Own graph, based on the data collected by the CSOs involved in the CCO platform

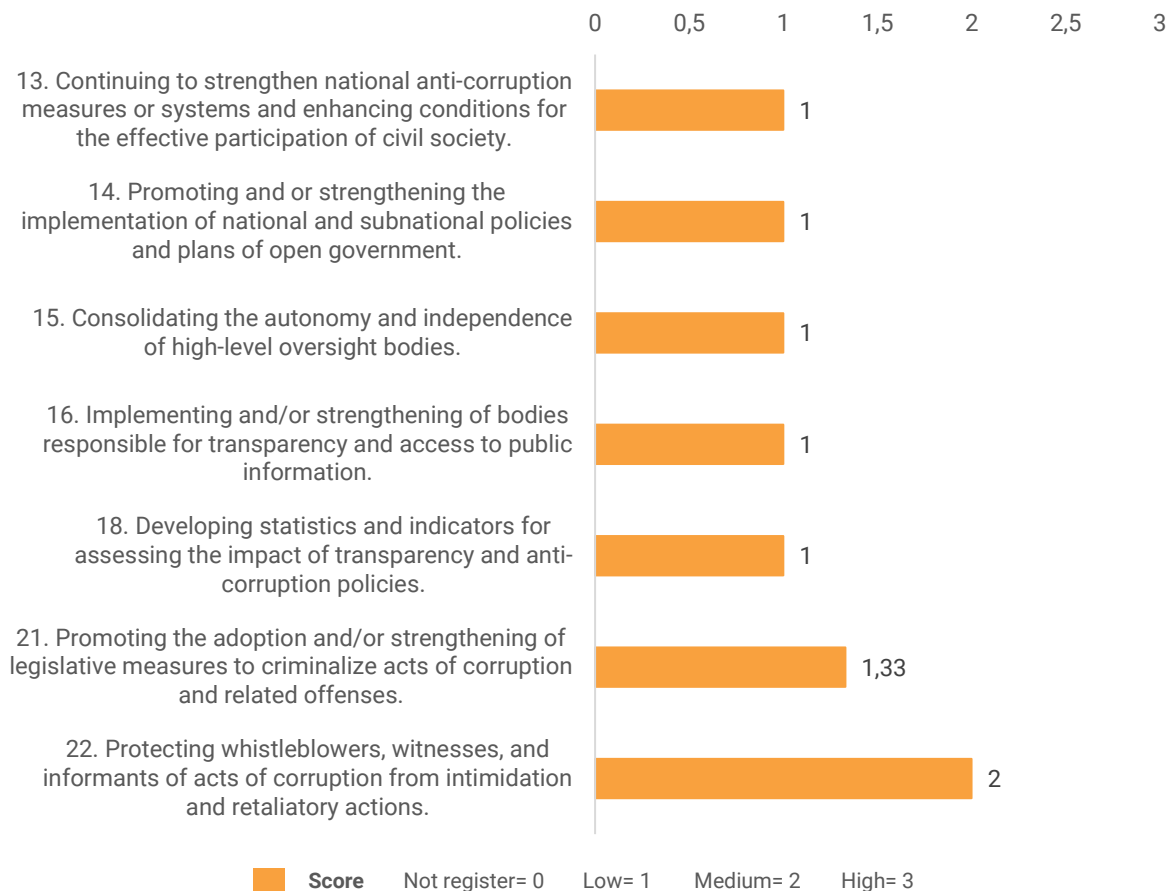
The second highest rated topic in the overall follow-up was the reinforcement of democratic governance. In this regard, it should be noted that the two commitments with the highest score envisage traditional approaches to fighting corruption, such as measures to prevent conflicts of interest, as well as new approaches, such as promoting gender equity and equality in anti-corruption policies.

- Indeed, Commitment 7, which focuses on the promotion of gender equity, received an average score (2.0/3.0), revealing progress in this area with the creation of a ministry in charge of gender issues and efforts to increase the gender quota in the various government entities. However, the relationship between gender equity and equality and the fight against corruption were not the result of a statutory order, but has been initiated by the entities and civil society, so that the capacity for action and progress is limited.
- In addition, the low score of Commitment 8 is of concern, because it reflects discriminatory behaviors against the LGTBIQ+ community. For instance, in 2017, the Haitian Senate voted against the bill that sought to allow same-sex marriage, and its author was sentenced to jail and a fine. This means that there is still a long way to go to integrate vulnerable communities.
- In contrast, the measures that seek to guarantee judicial independence, including Commitment 1, received a rating of 1.0/3.0. This result demonstrates that the regulatory framework envisages judicial independence, but does not it grant financial autonomy, which has led to dependence on and intrusion by the executive over the past two years.

On the other hand, cooperation measures are important among the activities that seek to strengthen the judicial system. For example, the United Nations peacekeeping and development mission's work plan includes the strengthening of court authorities since 2018, in order to ensure access to justice for the entire population (United Nations, 2018).

## 2. Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression

**Graph 3. Results for Commitments related to Transparency, Access to Information, Protection of Whistleblowers and Human Rights, including Freedom of Expression.**



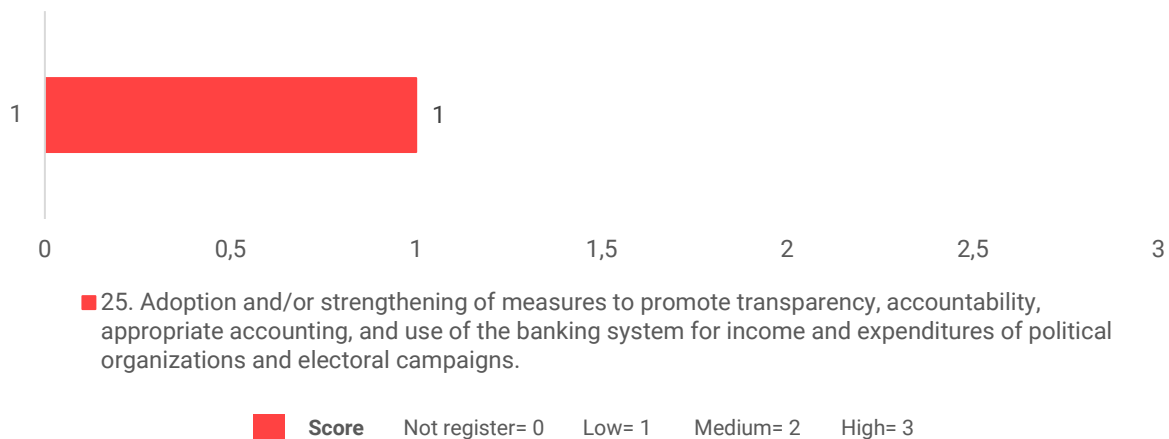
Own graph, based on the data collected by the CSOs involved in the CCO platform

- The scores obtained in the above topics show a lack of a transparency and public information access law, which creates difficulties for the implementation and articulation of anti-corruption plans and programs.
- Nevertheless, among the five commitments that scored low (1.0/3.0) Commitment 15 stands out, with a 100% of positive normative responses, suggesting the existence of independent oversight bodies focused on oversight of public officials, public resources and human rights monitoring. This contrasts with the practical questioning carried out by the CSOs, since they found that in the last two years no measures have been taken to strengthen the independence or autonomy of these bodies and, on the contrary, there have been instances of interference with their actions.

- Regarding Commitment 22, concerning whistleblower protection, its score was Medium (2.0/3.0), the highest in this area. Here, draft law for the protection of whistleblowers, which was created by consolidating and respecting Haiti's international commitments, is noteworthy. Even though the draft law does not yet have presidential approval, the development thereof and the information obtained by the CSOs regarding its content show that it represents a step forward in the protection of whistleblowers in the country.

### 3. Financing of Political Organizations and Electoral Campaigns

**Graph 4. Result for the Commitment related to the Financing of Political Organizations and Electoral Campaigns.**

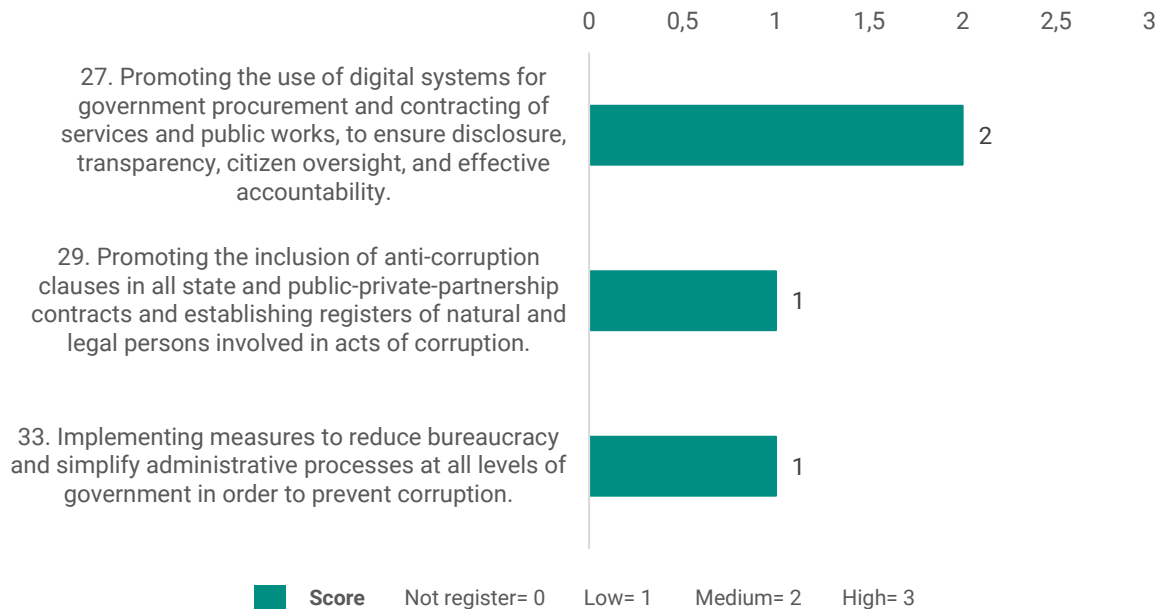


Own graph, based on the data collected by the CSOs involved in the CCO platform

- Regarding the Haitian electoral system, it should be recalled that the legislative developments that frame the democratic process are recent. The law regulating the creation, operation and dissolution of political parties was enacted in 2014 and describes the distribution of party funding and mentions the responsibility of the electoral law to establish the modalities of financing electoral campaigns. Furthermore, the electoral code enacted in 2016 does not provide for rules for campaign financing.
- Bearing this in mind, even though a campaign finance reporting mechanism is in place, the results, data, and reports therefrom are not public, as the information provided to the Provisional Electoral Council (PEC) is not complete.
- In this sense, the CCO noted a lack of government efforts (policy and practical) to articulate or implement anti-corruption measures in the operation of political parties or in campaign financing.

#### 4. Prevention of Corruption in Public Works and Public Procurement and Contracting

**Graph 5. Results of commitments related to Prevention of Corruption in Public Works and Public Procurement and Contracting**



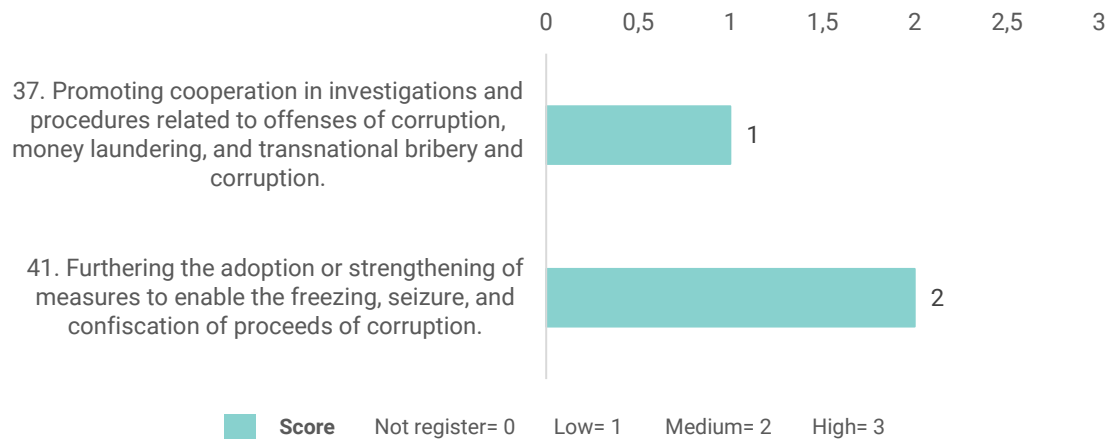
Own graph, based on the data collected by the CSOs involved in the CCO platform

- When collecting information from practice indicators, CCO organizations sought to gather more information from public entities. However, they were refused, being denied the information and told to visit public websites, where not enough data can be found.
- The highest score for this topic is obtained under Commitment 27, focused on promoting the use of digital systems for public procurement and contracting of services and public works. This reflects government initiatives to implement an electronic procurement system. However, this system is currently not operational.
- Commitment 33 on reducing bureaucracy and procedures was negatively answered under 100% of the normative and practical indicators, and therefore scored low (1.0/3.0). Despite the lack of regulations in this area, the incorporation of the e-procurement system is expected to bring great progress in this regard.



## 5. International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime and Money Laundering; and Asset Recovery

**Graph 6. Results of Commitments related to International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery**



Own graph, based on the data collected by the CSOs involved in the CCO platform

- The collection of information to evaluate the progress in this area was more difficult than in the other areas, as the participating organizations did not have access to enough information in order to produce a more accurate analysis of the commitments' progress.
- Commitment 37, which aims at promoting the widest possible cooperation in investigations and proceedings related to corruption, money laundering, bribery and transnational corruption offences, scores low because there is no normative development to promote inter-institutional cooperation. In addition, in practice it is noted that no information is available on the measures implemented for joint procedures or investigation.
- Likewise, given Commitment 41, while Haiti has had a law allowing embargo measures in case of corruption, since 1961, in practice, it is yet unknown how they work. This is because those involved in acts of corruption have managed to frustrate the existing mechanisms for action on numerous occasions.

## Conclusions

The fight against corruption is a daily challenge that requires everyone to be aware of the need to promote a real change in culture. Laws and internal policies, while essential, are not enough to prevent corruption. They must be combined with a true anti-corruption culture, a mindset and values that reject and condemn all forms of corrupt practices and at the heart of which integrity is an integral part of the daily life of all actors in society.

For this reason, the Lima Agreement is deemed to be a tool for both governments to better structure their fight against corruption and civil society to put pressure on governments –for example, by urging them to adopt measures to protect whistleblowers or with messages aimed at ensuring free access to public information.

Nonetheless, since the adoption of the Lima Agreement in April 2018, signed by President Jovenel Moïse, no efforts have been made by the Haitian government to promote the implementation of the commitments or to enforce their clauses to the point that the Lima Agreement has never been part of a political figure's speech or heard in the media.

Even researchers informed that the high officials of the Ministry of Foreign Affairs who were interviewed said they were not aware of this agreement and others only knew about the Summit of the Americas held in Lima in 2018.

At the level of the Haitian OAS office, no significant efforts have been made. An information session on the Lima Agreement organized by FINESTE with the support of the Citizen Forum of the Americas for CSOs in Haiti, where the Special Representative of the Secretary General of the OAS in Haiti, Mr. Cristobal Dupouy, was present, was held. In our view, Cristobal Dupouy delivered an excellent presentation on the Lima Agreement, and Cathrine Pognat, who is the representative of the Secretary General of the OAS in Honduras, spoke about the context of this commitment and the various efforts made to achieve this commitment, the Lima Agreement. Therefore, we recommend taking steps towards a change of culture that makes corruption socially unacceptable, an effective system to reduce any possibility of corruption and accountability of each actor in society.

## Recommendations

Several initiatives could be taken to strengthen democracy and governance in Haiti, including

- One approach would be to strengthen decentralization of central government powers.
- To reinforce the public sector, salaries could be increased or a pay-for-performance program could be introduced.
- Focusing on e-government initiatives could result in the creation of an electronic birth registry or the digitization of other government services, as discussed in the broadband research.
- Elections are currently very expensive, but time and money could be saved by creating an e-voting system, which also has the potential to improve voter turnout.
- Teaching children civics and civic skills means educating the next generation on democracy and the mechanics of government.



## References

CCO (2021). Metodología de seguimiento al cumplimiento de los Compromisos de Lima. Disponible en: <https://occ-america.com/metodologia/>

CCO. (2021): First Assessment of the Citizen Corruption Observatory (CCO): Monitoring the Implementation of the Lima Agreement Regulatory Indicators. Available in: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorrupcion-en-la-region/>

Journal Officiel de La Republique D’Haiti. (2013). Loi sanctionnant le Blanchiment de Capitaux et le Financement du Terrorisme. Retrievable in [https://www.oas.org/juridico/PDFs/mesicic4\\_hti\\_deniere.pdf](https://www.oas.org/juridico/PDFs/mesicic4_hti_deniere.pdf)

OAS, (2007). Unite De Lutte Contre La Corruption (Ulcc) / Strategie Nationale De Lutte Contre La Corruption. Retrievable in [https://www.oas.org/juridico/PDFs/mesicic4\\_hti\\_strat.pdf](https://www.oas.org/juridico/PDFs/mesicic4_hti_strat.pdf)

Transparency International. (2018). Corruption Perceptions Index. Available in: <https://www.transparency.org/en/cpi/2018/index/dnk>

Transparency International. (2020). Corruption Perceptions Index. Available in: <https://www.transparency.org/en/cpi/2020/index/nzl>

United Nations. (2020). Haiti’s Stability in Peril without Strong Response to COVID-19, Legal Expert Tells Security Council. Available in: <https://www.un.org/press/en/2020/sc14218.doc.htm>



## Annexes

### Annex 1: Rating of the Lima Agreement in Haiti

**Table 1. Follow-up Criteria for Commitments Related to Reinforcement of Democratic Governance.**

Commitment	Relevance	Efficiency	Sustainability	Country Average
2. Strengthening judicial autonomy and independence, following applicable inter-American and universal standards on this matter, to promote respect for the rule of law and access to justice, as well as to promote and encourage policies of integrity and transparency in the judicial system.	1.00	1.00	1.00	1.00
7. Promoting gender equity and equality and women's empowerment as a cross-cutting goal of our anti-corruption policies, through a task force on women's leadership and empowerment that will actively promote cooperation among inter-American institutions and synergies with other international agencies.	2.00	2.00	2.00	2.00
8. Including different vulnerable groups in defining measures to strengthen governance and combat corruption, recognizing their serious impact on these populations.	1.00	1.00	2.00	1.33
9 Ensuring transparency and equal opportunities in the selection processes of public officials, based on objective criteria, such as merit, equity, and aptitude.	2.00	2.00	2.00	2.00
10. Promoting the adoption of measures to prevent conflicts of interest, as well as the submission of declarations of assets and financial information by public officials, as appropriate.	1.00	1.00	1.00	1.00
11. Furthering codes of conduct for public officials that contain high standards of ethics, probity, integrity and transparency, using as a point of reference the "Guidelines for the Management of Policies for Probity in the Public Administrations of the Americas" and urging the private sector to develop similar codes of conduct.	1.00	1.00	1.00	1.00

**Table 2. Follow-up Criteria for Commitments Related to Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression.**

Commitment	Relevance	Efficiency	Sustainability	Country Average
13. Continuing to strengthen national anti-corruption measures or systems and enhancing conditions for the effective participation of civil society, social organizations, academia, the private sector, citizens, and other social actors in monitoring government performance, including the development of prevention mechanisms, channels for reporting possible acts of corruption and facilitating the work of watchdogs including other citizen oversight mechanisms, and incentivizing the adoption of digital means of participation..	1.00	1.00	1.00	1.00
14. Promoting and or strengthening the implementation of national policies and plans, and as appropriate subnational plans in the areas of open government, digital government, open data, fiscal transparency, open budgeting, digital procurement systems, public contracting and a public registry of state suppliers, considering towards that end the participation of civil society and other social actors.	1.00	1.00	1.00	1.00
15. Consolidating the autonomy and independence of high-level oversight bodies.	1.00	1.00	1.00	1.00
16. Implementing and/or strengthening of bodies responsible for transparency and access to public information, based on applicable international best practices.	1.00	1.00	1.00	1.00
18. Developing statistics and indicators in our States for assessing the impact of transparency and anti-corruption policies and advancing government capacity in this field.	1.00	1.00	1.00	1.00
21. Promoting the adoption and/or strengthening of such legislative measures as are necessary to criminalize acts of corruption and related offenses consistent with the United Nations Convention against Corruption (UNCAC), the United Nations Convention on Transnational Organized Crime, and the Inter-American Convention against Corruption (IACAC).	0	0	0	0
22. Protecting whistleblowers, witnesses, and informants of acts of corruption from intimidation and retaliatory actions.	2.00	2.00	2.00	2.00



**Table 3. Follow-up Criteria for Commitments Related to Financing of Political Organizations and Election Campaigns.**

Commitment	Relevance	Efficiency	Sustainability	Country Average
25. Encouraging adoption and/or strengthening of measures that promote transparency accountability, appropriate accounting, and use of the banking system for income and expenditures of political organizations and parties, especially those related to their electoral campaigns, in order to guarantee the licit origin of the contributions and penalizing anyone involved in accepting illicit contributions.	1.00	1.00	1.00	1.00

**Table 4. Follow-up Criteria for Commitments Related to Prevention of Corruption in Public Works and Public Procurement and Contracting.**

Commitment	Relevance	Efficiency	Sustainability	Country Average
27. Promoting the use of digital systems for government procurement and contracting of services and public works, to ensure disclosure, transparency, citizen oversight, and effective accountability.	2.00	2.00	2.00	2.00
29. Promoting the inclusion of anti-corruption clauses in all state and public-private-partnership contracts and establishing registers of natural and legal persons involved in acts of corruption and money laundering with a view to ensuring that they are not contracted.	1.00	1.00	1.00	1.00
33. Implementing measures to reduce bureaucracy and simplify administrative processes at all levels of government in order to prevent corruption.	1.00	1.00	1.00	1.00

**Table 5. Follow-up Criteria for Commitments Related to International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery.**

Commitment	Relevance	Efficiency	Sustainability	Country Average
37. Promoting the broadest possible cooperation among judicial, police, and prosecutorial authorities, financial intelligence units, and administrative authorities in investigations and procedures related to offenses of corruption, money laundering, and transnational bribery and corruption.	1.00	1.00	1.00	1.00
41. Furthering the adoption or strengthening of measures through relevant institutions to enable the freezing, seizure, and confiscation of proceeds of corruption.	2.00	2.00	2.00	2.00