



KINGDOM OF CAMBODIA
NATION RELIGION KING

Anti-Corruption Strategy and Policy

National Strategic Plan Phase IV

2025-2030



ANTI-CORRUPTION INSTITUTION (ACI)

NATIONAL COUNCIL AGAINST CORRUPTION (NCAC)

ANTI-CORRUPTION UNIT (ACU)





ROYAL MESSAGE

**HIS MAJESTY KING NORODOM SIHAMONI
KING OF THE KINGDOM OF CAMBODIA**

**On the Occasion of the Launch of the Anti-Corruption Strategy and Policy
Phase IV
(2025-2030)**

The prosperity and progress in all sectors of our beloved motherland reflect the noble and correct leadership path of the Royal Government under the many mandates led by **Samdech Akka Moha Sena Padei Techo Hun Sen, former Prime Minister and current President of the Senate and President of the Supreme Privy Council to the King of the Kingdom of Cambodia**. From economic growth of approximately 7% for over two decades to the reduction of poverty to under 10%; from development in both urban and rural areas regarding infrastructure, bridges, roads, water, and electricity to the maintenance of public security; and from reform after reform—all stand as testimony to the quality of national service and the efficiency of serving the people by the Royal Government. The Government has exerted its full strength, wisdom, and spirit to fulfill the responsibilities entrusted by the people, while also building the foundation and succession resources to lead with confidence and national pride for the 7th mandate Royal Government under the leadership of **Samdech Moha Borvor Thipadei Hun Manet, Prime Minister**, whose more than two years of leadership have been full of will, high commitment, vigor, and energy. Amidst challenges and obstacles within an unstable global context—in terms of both social and economic security—and deepening competition at both regional and global levels, alongside the ambitious national leadership policy programs that have been set forth, I believe that our Cambodian motherland is safe in its journey toward new goals of construction and long-term sustainable development under the leadership of the current Royal Government, combined with the orientation and unconditional support from the leaders of previous mandates.

I firmly believe that participating as a collective force with the Royal Government in the agenda of continued construction and development is of fundamental value, especially in the implementation of state reforms and priority tasks such as the promotion of good governance and anti-corruption, which are among the Royal Government's key agendas. Participation requires us to start from each individual, each group, each community, and our society as a whole. Each of us must sacrifice personal interests, adhere to a mindset of cleanliness and integrity, and commit only good deeds. The absence of these noble actions—especially due to personal interest, greed, the taking of common interests for personal gain, as well as the commission of corruption—will create obstacles to the recovery, development, and building of Cambodian society toward greater progress, aiming to transform our motherland into an advanced and civilized nation.

Through many years of efforts in combating corruption, I have witnessed commendable achievements successively achieved by the Royal Government, as well as by the Anti-Corruption Institution, which serves as the state's assisting body, leading and promoting anti-corruption work for instance, instilling clean mindset, living with good deeds, abhorrence of corruption, and building a foundation of the integrity from childhood to future generations, participating in building social justice, especially among youths who are the bamboo shoots and the future of our country, and to ensure the law enforcement with conscience and ideals. Paving the way for creative and fruitful work has truly contributed to building the foundation of development, accumulating a clean living and business environment, and has also elevated the future of the country to be even more prosperous and glorious.

On the occasion of the launch of the Fourth Phase of the Anti-Corruption Strategy and Policy (2025-2030) by the Anti-Corruption Institution, I would like to express my sincere and heartfelt support and high appreciation for the commitment and resolute will in uplifting the image and prestige of our beloved country to overcome all obstacles and to be able to move forward even faster, aiming to the attainment of the full peace and prosperity. The long-term vision and ambitious goals ahead, accompanied by the anti-corruption strategy and policy that are now being launched, will be achievable when we all unite, support, and participate in all endeavors with the Royal Government and the Anti-Corruption Institution.

I wish the leaders and officials of the Anti-Corruption Institution, all relevant stakeholders involved in the implementation of this crucial strategy and policy, as well as all compatriots, to be blessed with the four gems of Buddha's blessings: longevity, nobility, good health, and strength forever.

NORODOM SIHAMONI

Done at the Royal Palace, [Day] [Month], 2025



Samdech Akka Moha Sena Padei Techo Hun Sen

President of the Senate of the Kingdom of Cambodia

MESSAGE CONVEYED BY

SAMDECH AKKA MOHA SENA PADEI TECO HUN SEN

PRESIDENT OF THE SENATE OF THE KINGDOM OF CAMBODIA

**On the Occasion of the Launch of the
Anti-Corruption Strategy and Policy, Phase IV
(2025-2030)**

Cambodia's journey in seeking peace, nation-building, and development to its current state has been full of obstacles, challenges, and crises. From one stage to another, this journey has consistently demonstrated sacrifice, devotion, commitment, and the strength of solidarity in national leadership, as well as the support and trust in the leadership of the Royal Government—both during the mandates under my leadership and continuing through the leadership of the 7th Mandate Royal Government under **Samdech Moha Borvor Thipadei Hun Manet, Prime Minister**. In recent decades, under the shadow of the Nation, Religion, and King, the Cambodian people have joined with the Royal Government to show resilience—striving to survive, build, develop, improve, preserve, and modernize for peace and long-term sustainable progress. The value of this strength, especially Cambodia's internal strength, has become more clearly manifested and essentially important in the context of the country's current development process. We must continue to unite in all forms and possibilities as a nation to strengthen and expand our human resources from one generation to the next, to cast the pillars of protection even deeper, and to develop the country to be stronger and more efficient at a higher level, aiming to maintain territorial integrity and sovereignty and bring more prosperity to the country and its citizens.

With 38 years of experience leading the country and the Royal Government alongside many loyal and capable colleagues—starting from scratch and through times of extreme shortage and hardship—I have navigated all the bitter, sour, sweet, and salty flavors of this experience until reaching the achievement of full peace throughout the country. This included organizing the foundations for development, including the administrative management framework, laws, and legal standards favorable for the participation of all key actors in society, including the state, private sector, civil society, academia, the media, and the general public, and especially receiving strong support from the citizens, the owners of the country and the voters, as shown in the past democratic, free, and multi-party general elections. In more than two years of providing the opportunity for succession to the bamboo shoots who are the new generation of human resources leading the country and the 7th Mandate Royal Government, I see the true quality and efficiency of leadership, reform, and development—preserving what is good, correcting what is not yet better, and putting forward more new initiatives to accelerate Cambodia's vessel toward a shore of harmony and prosperity like other civilized nations. With these testimonies, I dare to claim that Cambodia is walking on a correct path under the banner of succession led by the Head of the Royal Government, **Samdech Moha Borvor Thipadei Hun Manet, Prime Minister**. I also call upon all state and non-state institutions, as well as all citizens, to continue participating as the Great Cambodian Family with the Royal Government in implementing the programs and policies set forth for leading the country, especially the

implementation of the national roadmap called the Pentagonal Strategy-Phase 1 (2023-2028), which was launched as a continuation of previous mandates and expanded to be more comprehensive, interconnected, and responsive to the evolution and context of the country and the world.

On the occasion of the launch of the Anti-Corruption Strategy and Policy, Phase 4 (2025-2030), which has been synchronized with the Pentagonal Strategy to support the promotion of good governance and clean public institutions—a key core of the Pentagonal Strategy—by the National Anti-Corruption Council for the Anti-Corruption Unit to implement, I request all involved actors in every sector and every department to participate in supporting and fulfilling their respective roles, duties, and responsibilities for the national and public interest. In my capacity as President of the Senate, I also urge the participation in the implementation of this strategy by the legislative branch, especially the promotion of work and participation in many other forms by the 10th Commission of the Senate, both in fulfilling their duties and in supporting and fulfilling the necessary legal aspects and legal standards for this joint effort with the executive, the judiciary, anti-corruption institutions, and international institutions both within and outside the region that participate in the effort to fight corruption and strengthen governance in the management and leadership of the country.

I wish the leadership and officials of the anti-corruption institutions, all stakeholders, as well as all compatriots, the four blessings of the Buddha: Longevity, Nobility, Happiness, and Strength.

Phnom Penh, [Day] [Month], Year 2025

**President of the Senate and President
of the Supreme Privy Council to the King of
the Kingdom of Cambodia**

**Samdech Akka Moha Sena Padei
Techo Hun Sen**



MESSAGE

SAMDECH MOHA RATTSAPHEATHIKAR THIPADEI KHUON SUDARY

PRESIDENT OF THE NATIONAL ASSEMBLY OF THE KINGDOM OF CAMBODIA

**On the Occasion of the Launch of the
Anti-Corruption Strategy and Policy, Phase IV
(2025-2030)**

Under the constitutional monarchy and through liberal multi-party democracy, the National Assembly of the Kingdom of Cambodia, established following the 1993 general election, has actively fulfilled its core roles, namely its legislative role, representation, and the monitoring of law enforcement, and has significantly contributed to socio-economic development, particularly in ensuring the promotion of democracy and the rule of law. The National Assembly considers corruption a **“major obstacle to national development,”** which requires all stakeholders, including the legislative and executive bodies, the private sector, civil society, the media, and the general public—and especially every individual—to participate together in fighting this corruption to build a Cambodian society that is developed, advanced, clean, dignified, and harmonious.

In this spirit, the Cambodian National Assembly adopted the **“Law on Anti-Corruption”** in 2010 and established the **“Commission on Investigation, Clearing, and Anti-Corruption,”** which serves as a vital mechanism in ensuring the sustainability of national development, strengthening the trust of the national and international public, and promoting good governance and the rule of law. From the 1st legislature until the 7th legislature (2023-2028), the National Assembly has considered “good governance” as the core and solid foundation for leadership and development in all sectors. The National Assembly has actively and proactively participated with the Royal Government in multi-sectoral efforts to drive the deep reforms of the Royal Government in every mandate, especially the 7th mandate Royal Government under the wise leadership, long-term vision, and energy of **Samdech Moha Borvor Thipadei Hun Manet, Prime Minister**, who launched the Pentagonal Strategy-Phase 1 to achieve the 2030 vision of becoming an upper-middle-income country and a high-income country by 2050.

In the past period, the National Assembly has consistently interacted, communicated, and consulted with public institutions responsible for various sectors, including anti-corruption institutions within the national framework, to create understanding and positive exchanges of views on the review mechanism for the implementation of the United Nations Convention against Corruption (UNCAC) for both cycles (2015-2025); consulted with the Anti-Corruption Unit on education, prevention, and the enforcement of the Law on Anti-Corruption; and regularly provided input on anti-corruption policies and national strategic plans. In the international framework, the National Assembly has also actively participated in fulfilling international obligations, shared Cambodia’s good experiences with the world, and brought back many positive perspectives and best practices to study and implement within the country. These activities reflect the benefits of cooperation and uniting to achieve the common national goal and aspiration: building a Cambodian society that is clean, dignified, and free from corruption.

I continue to encourage both institutions—the National Assembly and the anti-corruption bodies, comprising the National Anti-Corruption Council and the Anti-Corruption Unit—to persist in their joint efforts to provide essential support for the implementation of the 7th mandate Royal

Government's programs and policies to achieve even greater brilliant success. I firmly believe that with the determination of clear strategic goals, the strength of solidarity for the national interest and the interest of the people—who are the voters and owners of the country—and the participation of all actors in society, the Kingdom of Cambodia will surely achieve the 2030 and 2050 visions.

On behalf of the National Assembly of the Kingdom of Cambodia and on my own behalf, I fully support and highly value the content of the National Anti-Corruption Strategy, Phase 4 (2025-2030), which is comprehensive in the aspects of "prevention, obstruction, education, and suppression," and which will become a compass and a powerful tool in promoting transparency, accountability, and social justice. The Cambodian National Assembly is committed to continuing its support for the Royal Government and anti-corruption institutions, within both the legal framework and the necessary regulatory frameworks, to achieve the common goals of the nation and the people. At the same time, I appeal for the support and participation of all relevant actors, including members of the National Assembly and the Senate, judicial officials, civil servants, businesspeople, civil society, and every individual, to successfully implement the national anti-corruption strategy.

I wish the National Anti-Corruption Council, the leadership, and all civil servants in the Anti-Corruption Unit the four blessings of the Buddha: Longevity, Nobility, Happiness, and Strength, and may you achieve further new successes in the cause of building and developing the motherland.

Phnom Penh, [Day] [Month], Year 2025

KHUON SUDARY



**Samdech Moha Borvor Thipadei Hun Manet
Prime Minister of the Kingdom of Cambodia**

MESSAGE CONVEYED BY

**SAMDECH MOHA BORVOR THIPADEI HUN MANET
PRIME MINISTER OF THE KINGDOM OF CAMBODIA**

**On the Occasion of the Launch of the
Anti-Corruption Strategy and Policy, Phase IV
(2025-2030)**

The former Royal Government, under the great and wise leadership of **Samdech Akka Moha Sena Padei Techo HUN SEN, former Prime Minister and the current President of the Senate, President of the Supreme Privy Council to His Majesty King**, sacrificed and risking of his own life for the sake of peace and national unification, having devoted both his physical and mental strength, wisdom, with all the spirits to build and develop the country in all fields. The achievements bequeathed to the 7th mandate of the Royal Government under my leadership, including the overwhelming support and trust from the electorate, the owners of the country, the nurturing of successor foundations, experience, knowledge, skills, leadership stewardship, and practical knowledge learnt, and especially the continued unconditional support, are playing the role as a lantern enlightening the way as a guide orienting towards the further development and prosperity of our nation. The ambition set out in the vision to lead Cambodia to become an upper-middle-income country by 2030 and a high-income country by 2050 will continue to drive the momentum of reforms in all sectors and the implementation of the political platform set out with innovations, flexibility, and adaptability stipulated in the Pentagonal Strategy - Phase 1 (2023-2028) to lead the work of the Royal Government, accompanied by the five pronged approaches: **"Reflecting oneself in mirror, taking bath, rubbing off dirt, taking treatment, and undergoing operation"** together and the **"Dynamics of the Single-Actor System"** approach, which serve institutional development, the strengthening of good governance, and the expansion of work efficiency in the public sector. Promoting a clean administration, which is a priority set in the Pentagonal Strategy-Phase 1 (2023-2028), will require deeper internal institutional reforms to respond to the vision and aspirations of the Royal Government. This reform, along with many other reforms such as those in public finance, public administration, law and justice, and decentralization and deconcentration, which are being actively promoted, has contributed to supporting the fight against corruption—a cross-cutting and multi-sectoral issue—to be more qualitative and fruitful.

I wish to continue encouraging participation in anti-corruption work with anti-corruption institutions from all relevant parties, including the legislative, executive, and judicial branches, public institutions, the private sector, civil society, academia, the media, and the general public. I believe that participation from all circles will enable the Royal Government and anti-corruption institutions

to bring about more new proud achievements and will also help us move closer to our common goal: expanding leadership and management efficiency and narrowing risks and challenges aimed at reducing and moving toward the elimination of corruption, which is the enemy of development and poverty eradication efforts. Participation from various actors, especially from ministries and institutions—both in terms of education, spirit, and mindset to uphold good ethics and integrity, as well as preventing or closing opportunities and avenues for corruption and providing cooperation to anti-corruption institutions in law enforcement and suppression—remains an absolute necessity and priority.

I offer my unwavering support once again, as well as that of the Royal Government, to all leaders and officials of the Anti-Corruption Unit in continuing their noble mission in accordance with the strategy and policy set forth by the National Anti-Corruption Council for the next five years (2025-2030).

I wish the 11 members of the National Anti-Corruption Council, the Chairman, Vice-Chairmen, leaders, and all civil servants in the Anti-Corruption Unit the four blessings of the Buddha: Longevity, Nobility, Happiness, and Strength, and may you achieve more new successes for the 4th mandate (2025-2030).

Phnom Penh, [Day] [Month], Year 2025

HUN MANET

PREFACE

Under the shadow of peace and decades of leadership of the greatest man of Cambodia, **Samdech Akka Moha Sena Padei Techo HUN SEN, former Prime Minister and current President of the Senate, President of the Supreme Privy Council to His Majesty King**, Cambodia has achieved progress and development in all fields. The commendable achievements made for the nation reflect the capacity and quality of leadership that is strong, wise, and skillful, overcoming all obstacles, seizing every opportunity, constantly evolving, tirelessly reforming, adapting, flexible with all the circumstances, both in the national and international context, aiming at achieving the common goal that both the country and the people aspire to, which is living in peace, harmony, and long-term sustainable development. The political platform of the country that has been respectively set out, within all the phases both the Triangular Strategy and the Rectangular Strategy, are to be succeeded and sharply spearheaded by the current Royal Government of the 7th mandate under the fervent and dynamic leadership of **Samdech Moha Borvor Thipadei HUN MANET, Prime Minister**, reaffirming the continuity of the correct pathway of the national development policy, which is being implemented with the will and resolute, and clear commitment on multiple fronts, including the fight against corruption, which has always been and continues to be a core priority of the country. Along with these favorable conditions of these policies and strategies, the adoption of the Anti-Corruption Law, the establishment of the Anti-Corruption Institution, all the actions taken out in the forms of measures, messages, reforms, incentives, together with the involvement and cooperation from all relevant parties, and the unwavering support of the Head of the Royal Government with all the efforts made by the Anti-Corruption Institution to fulfill the historic roles and duties attached to it which is surely confirms that all the supports and efforts made by ACU have strongly motivated and encouraged the leaders and officials of the Unit to overcome all the obstacles, to strive and sacrifice, both physically and spiritually, to fulfill their roles and duties with responsibility and professionalism, aiming to bring about all the achievements in the fight against corruption for the Royal Government and the nation as a whole.

As in previous mandates, the National Council Against Corruption has launched the National Strategic Plan on Anti-Corruption (2025-2030), which has been aligned with and adapted to the state's policy and political platform to ensure that the ACU shall use the set out strategy as the roadmap in implementing its roles, duties, and to take all measures and actions and various activities to contribute to supporting the overall efforts of the Royal Government, as well as to support other various reforms and efforts made by relevant public institutions and the private sector together with the general public, as well as to support the fulfillment of Cambodia's obligations to the international community in various inter-governmental forums, such as the UNCAC-APG, etc. The activities highlighted in the five-year strategic plan ahead will include some tasks remained from previous plans, some not yet implemented, some adjusted, and some are newly defined according to the actual context and the recent developments within the area of anti-corruption work. Experiences from the past implementation, both from direct and indirect inputs received from various stakeholders such as public institutions, the private sector, civil society, academia, the media, etc., have also contributed to the preparation and development of this Fourth Phase of the National Strategic Plan on Anti-Corruption.

Overall, the work for the next five years will continue to focus on six pronged strategic areas: (1). Education, (2). Prevention, (3). Law Enforcement, (4). Policies, Laws, and Regulations, (5). National and International Cooperation and Assets Recovery, (6). Strengthening the Capacity, Internal

Governance and Monitoring and Evaluating the Implementation of the Strategic Plan, with the strengthening of the implementation of the reporting regime and the dissemination of achievements from the implementation of the National Strategic Plan to be as widely as possible. Many key strategic activities have been set out, aiming to enhance work efficiency, expand the scope of implementation, support the state's reform efforts to be more fruitful, to enhance the cooperation, and to concentrate on the collective forces and efforts for the public interest and common goals, and to respond to Cambodia's obligations and potentially and proudly participate as a Member State with the responsibility under the framework of the international community.

We, as the Anti-Corruption Institution, pledge to continue striving to fulfill the mission of building a clean society by endeavoring to strengthen our capacity, professional skills, and especially to overcome all obstacles and challenges that may arise in the future. In this sense, we would like to continue to call on the leaders and officials at all levels of the Anti-Corruption Institution to continue to fulfill their roles and duties with strong will, great conscience, in the spirit of exemplary and national interest in accordance with the values of integrity, virtue, accountability, transparency, and loyalty to abide by the laws, aiming to participate in building and developing the nation to ensure the continuity of peace and to achieve prosperity and harmony for Cambodian society under the shadow of our only one country's motto that is the **Nation, Religion, King**. We wish all the leaders and officials of the Anti-Corruption Institution with the four gems of Buddha's blessings and the success in all their endeavors.

Phnom Penh, [Day] [Month], Year 2025

For the National Council Against Corruption
President

Senior Minister
President of the Anti-Corruption Unit

Samdech Kitti Sangha Pandita MEN SAM AN

Kitti Nitti Kosal Pandita OM YENTIENG

Members of National Council Against Corruption – Mandate I - 2011-2015



H.E. Mr. Top Sam

Nominated by the National Assembly



H.E. Mr. Prak Sok

Nominated by the Senate



H.E. Mr. Kuy Sophal

Appointed by H.M. the King



H.E. Mr. Chan Tany

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H.E. Mr. Suy Mongleang

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**Senior Minister
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Members of National Council Against Corruption – Mandate IV - 2025-2030



Samdech Kitti Sangha Pandita MEN SAM AN

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H.E. Mr. Taing Sunlay

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H.E. Mr. Keo Remy

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**H.E. Mr. Kitti Nitti Kosal Pandita
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Senior Minister
President of Anti-Corruption Unit

CONTENT

PREFACE	i
Members of National Council Against Corruption - Mandate I - 2011-2015	iii
National Council Against Corruption - Half Mandate I - 2011-2015	iv
Members of National Council Against Corruption - Mandate II - 2015-2020	v
Members of National Council Against Corruption - Mandate III - 2020-2025	vi
Members of National Council Against Corruption - Mandate IV - 2025-2030	vii
CONTENT	
1. Introduction	1
1.1 Background	1
1.2 Rationalization of the National Strategic Plan (2025-2030)	2
1.2.1. National Political Tools	2
1.2.2. Regional and International Policy Instruments	4
1.2.3. Takeaways in the Implementation of all the Three Phases National Strategic Plan	4
1.3 Comparison between National Strategic Plan Phase 4 (2025-2030) and the National Strategic Plan Phase 3 (2020-2025)	5
1.4 The Development of National Strategic Plan, Phase 4 (2025-2030)	5
2. Review of the Implementation of the Third Phase of the National Strategic Plan (2020-2025)	6
2.1. History	6
2.2. Major Achievements	6
2.2.1. Education Work	6
2.2.2. The Prevention and Obstruction Work	12
2.3. Anti-Corruption Law Enforcement and International Cooperation	23
2.3.1. Anti-Corruption Law Enforcement	23
2.3.2. National and International Cooperation	29
2.4. Internal Governance (The Disciplinary and Internal Control Council)	33
2.5. Monitoring and evaluation and unimplemented work	35
2.5.1. Monitoring and evaluation work	35
2.5.2. Unimplemented Work	37
2.6. Successful Factors - Challenges -Lesson learned	37
2.6.1. Successful Factors	37
2.6.2. Challenges	38
2.6.3 Lesson learned	39
3. Analysis of the Surrounding Environment	40
3.1 Political, Economic, Social, Technological, Legal, and Environmental Analysis (PESTLE)	40
3.1.1 Political Analysis	40
3.1.2 Economic Analysis	41

3.1.3 Social Analysis.....	41
3.1.4 Technological Analysis.....	42
3.1.5 Legal Analysis	42
3.1.6 Environmental Analysis.....	43
3.2 Strengths, Weaknesses, Opportunities, Threats Analysis (SWOT)	43
3.2.1 Strengths	43
3.2.2 Weaknesses.....	43
3.2.3 Opportunities.....	43
3.2.4 Threats	44
4. Strategic Goals (2025-2030)	44
4.1 Vision	44
4.2 Mission	44
4.3 Policy	44
4.4 Value	44
4.5 Objective.....	44
4.6 Priority Strategic Works and Stakeholders	44
5. STRATEGY, CORE ACTIVITIES, GOALS, AND WORK PERFORMANCE INDICATORS	47
6. Strategic Plan and Budget	69
7. Monitoring and Evaluation	69
8. Reporting and Dissemination.....	69
9. Revisions	69
10. Conclusion	70
11.Collection of Images	72

1. Introduction

1.1 Background

Peace brings about growth and development. The legacy of peace achieved through the sacrifices of life, physical and mental strengths, and wisdom of the greatest man of Cambodia, **Samdech Akka Moha Sena Padei Techo HUN SEN, Former Prime Minister and the current President of the Senate and President of the Supreme Privy Council to His Majesty King**, has provided the current government with a harmonious foundation to thoroughly focus on continuing to unify, build, and lead the country to achieve further growth and development as well as for the Cambodian people to live with smile, hope and pride towards their beloved country. The legacy also produces a competent-based authority which is strong, virtuous, thoughtful, wise, strategic, policy-oriented, and willing to impel good governance, building and developing, which is conducive to a long-term sustainable development. These strategies, policies, and commitments have been reflected in numerous proud government's achievements from one mandate to another under the country's leadership agenda. The leadership's strength has been more clearly reflected during the crises including the Covid-19 pandemics and the global economic downturn inflicting severe negative impacts on Cambodia, the Cambodian government has still been able to resolve and overcome the crises with confidence and trusts.

On the fight against corruption, the Royal Government under the leadership of **Samdech Techo** had adopted the Law on Anti-Corruption in 2010 and through this law, the Anti-Corruption Institution was established, having the National Council Against Corruption as the oversight body providing recommendations and guiding the work, along with the Anti-Corruption Unit as a law enforcement agency. Strategies and policies leading the country including all the phases of the Rectangular Strategy and National Strategic Development Plan have been set out and implemented where, inter alia, good governance and the fight against corruption had been considered as core and key priorities for the government to ensure the effective leadership and management of the country. In addition, all the concrete actions taken, direct messages as well as the simple yet profound guiding approaches to guide, motivate and resolve, where the five-pronged approaches **"Reflecting oneself in mirror, taking bath, rubbing off dirt, taking treatment, and undergoing operation"** have been embedded and jointly implemented more widely by government officials. These policies, leadership approaches, and concrete actions have been continuously pushed by the Seventh Legislature of the Royal Government which is regarded as the successor and the bamboo shoot generation under the enthusiastic and dynamic leadership of **Samdech Moha Borvor Thipadei HUN MANET, Prime Minister**, where inter alia, necessary priorities and key activities including the reforms within the framework of public financial management, public administration, legal and judicial reform, decentralization and de-concentration have been streamlined to be more effective aiming to push Cambodia towards achieving a goal of becoming an upper-middle-income country by 2030 and a high-income country by 2050.

Anti-Corruption Institution, an independent body, plays a role as an assisting body to the Royal Government in leading the work of fighting against corruption as well as to implement the 03 phases of the National Strategic Plan on Anti-Corruption (2011-2025) by constantly refining and adapting its strategies and work to align with the policies and leadership recommendations of the Royal Government to ensure the efficiency and effectiveness in response to the aspiration of the government. Numerous achievements in good governance and the fight against corruption have been obtained resulted from tireless efforts of the Royal Government from past and present mandate based on the clear and effective guidance of the Head of Government as well as the strategies, advices and directions set out by the National Council Against Corruption on the commitment and

fulfillment of the historic roles and responsibilities of the leaders and officials at all levels of the Anti-Corruption Unit together with active participation from relevant stakeholders including public and private sectors, civil society, academia, media, and general public who have united for the sake and interest of building our nation to be a clean, strong, prosperous country.

In line with the will, commitment, and the spirit of policies of the seventh legislature of the Royal Government reflected in the key document “Pentagonal Strategy” Phase I, 2023-2028 and continuing from the National Anti-Corruption Strategy, Phase III, 2020-2025 as well as learning from the past experiences, the National Strategic Plan on Anti-Corruption, Phase IV, 2025-2030 has been developed to indicate the directions and determine ways forward on the work of building a clean society, a robust and effective institution, to promote transparency, integrity, and good governance and to mobilize the participation from all stakeholders for a common cause of our home country.

To successfully develop the strategic document that is consistent and integrated with the government’s policies and in line with international norms and standards, rationalization of national and international tools was conducted and the inputs from relevant stakeholders were considered to ensure diverse perspectives and inclusiveness.

This newly developed Strategic Plan, Phase IV, for the next five years (2025-2030) will continue to identify three priorities (1) Education (2) Prevention and Obstruction (3) Law Enforcement as core tasks and to be complemented by numbers of other priorities including (1) strengthening the law enforcement (2) continuing to support key and practical government’s reforms (3) strengthening strength and integrity of public administration and good governance in private and business sectors (4) strengthening cooperation between Anti-Corruption Institution and relevant partners from public and private sectors (5) increasing cooperation with international communities on better anti-corruption and anti-money laundering work.

The Anti-Corruption Institution strongly believes that the National Strategic Plan on Anti-Corruption, Phase IV, which is designed in line with the context of the political, economic, and social changes as well as with the Royal Government’s sharply reformed strategy, will bring about further success to the people, the Royal Government, and the society as a whole.

1.2 Rationalization of the National Strategic Plan (2025-2030)

1.2.1. National Political Tools

Pentagonal Strategy, Phase I, 2023-2028, was promulgated by the Head of the Royal Government of the seventh legislature, **Samdech Moha Borvor Thipadei HUN MANET, Prime Minister**, in August 2024, as a strategy which has been continuously refined and modified according to the development of the country’s circumstances and contexts from the previous mandate’s Rectangular Strategy and has served as a roadmap for the country’s operations in the overall macro-level and the micro-level framework of various ministries and institutions and has set out necessary action plans as well. The ambitious and desired goals of the Royal Government is to lead and navigate Cambodia to move forward with confidence and resilience and to continue to develop and deliberately overcome all obstacles, difficulties and challenges that may arise in both domestic and international contexts, which is full of uncertainty and the competition aspect in all sectors. The five-pronged approaches **"Reflecting oneself in mirror, taking bath, rubbing off dirt, taking treatment, and undergoing operation"** have been encouraged to continuously be complied and embedded for the practitioners who are public officials in discharging their roles and duties in accordance with the royal government’s policies and decisions. Monitoring and evaluation mechanisms to monitor the implementation of the Pentagonal Strategy has also been refined and implemented in a more scientific manner to ensure effectiveness and better performances. The success of implementing the four pillars of the Pentagonal Strategy includes (1) strengthening and

reforming institutions (2) enhancing human resources and work efficiency (3) enhancement and strengthening of the effectiveness of laws and justice system (4) the strengthening of the cooperation between private sector and businesses is intertwined with the third pillar which promotes the enhancing and strengthening of cleanliness in public administration, focusing on priorities as the following:

- 1- Developing and implementing the code of ethics and code of conduct in public services as well as to promoting adherence to the principles of incompatibility of functions and conflict of interests in discharging duties of public officials.
- 2- Enhancing the effectiveness of inspection and auditing as well as organizing of framework and rules of inspection and auditing system to ensure the harmonization of inspection and auditing functions in public administration.
- 3- Strengthening the mechanism of management and public service delivery and merit-based incentives, and taking strict legal actions in fulfilling duties and responsibilities to increase confidence and effectiveness in the public services delivery.
- 4- Continuing to strengthen and expand the education and prevention as a primary task as well to enhance the law enforcement to suppress corruption offences.
- 5- Strengthening cooperation between the Anti-Corruption Unit and public institutions particularly through focal point mechanism in both education and prevention to set out for implementation, monitor, and evaluate the implementation of strategic plans and the plans of promoting cleanliness in public institutions.

In a spirit of encouragement and hard work, the Head of the Royal Government has consistently made statements to promote good governance and the fight against corruption; for instance, a message delivered at the celebration of National-International Anti-Corruption Day on 9 December 2024, requested the Anti-Corruption Unit as well as other relevant institutions and stakeholders to jointly implement key activities in support of the joint efforts to fight against corruption which include:

- (1) Strengthening anti-corruption education to outreach a broader scope and penetrate deeper into the social strata both in and out of school, in public and private sectors, civil society, both before and during performing job duties.
- (2) Promoting prevention in public administration including a more transparent and accountable public service delivery, conflict of interest management, protection of whistleblowers, discipline and penalties, and so forth.
- (3) Strengthening the cooperation between the Anti-Corruption Unit and relevant partners including public institutions, anti-corruption focal points, legislative bodies, private sector, civil society, academia and media, aiming to strengthen and expand education and prevention more smoothly and effectively.
- (4) Fighting against corruption requires cooperation from all parties and cleanliness must come from within each party and institution. The Anti-Corruption Unit, an assisting body to the Royal Government, plays a role in promoting and coordinating necessary cooperation in both education and prevention work with all partners, focusing particularly on the implementation of policies and National Development Plan of the Royal Government and in line with National Anti-Corruption Strategic Plan set out by National Council Against Corruption.
- (5) Ensuring good governance in the leadership and management of institution, all public officials must bear in mind the five approaches **"Self-Reflection, Bathing, Scrubbing, Treatment, and Surgery"** as a compass showing directions in discharging roles and duties and live a life of professional ethics and responsibilities.

The Royal Government, in addition, has set out supporting mechanism and to strive for the achievements of the Sustainable Development Goals 2015-2030 set out by the UNDP, together with the Seventh Legislature of the National Strategic Development Plan of the Royal Government mainly focusing on action plans, considered as a cross-sectors strategy which serves the common goals stipulated in the Pentagonal Strategy as well.

1.2.2. Regional and International Policy Instruments

Regional and International Policies including Sustainable Development Goals (SDGs) 2015-2030, United Nations Convention against Corruption (UNCAC), and Financial Action Task Force (FATF) have been used as a basis to develop this national strategy.

The Goal 16 of the SDGs is a goal which promotes peace, justice and sustainable social development for all, and to build effective and accountable institutions at all levels. The Goal 16 has set out targets related to anti-corruption work as the followings:

- 16.3 Promoting the rules of law and ensuring equal access to justice
- 16.4 Combating illicit financial and arms flows and strengthening the asset recovery
- 16.5 Reducing corruption and bribery in all forms
- 16.6 Organizing the institutions with transparency, accountability and effectiveness
- 16.7 Ensuring responsive, inclusive, participatory and representative decision-making at all levels
- 16.10 Ensuring public access to information and protection of fundamental freedoms

United Nations Convention Against Corruption (UNCAC), a global international standard to which Cambodia has been a state member since 2007, had provided a foundation of knowledge and insights in both within the framework of national anti-corruption efforts and cooperation with international partners. Many good experiences that Cambodia has gained in participating in the implementation of review mechanism, the implementation of UNCAC, Phase I, both Cycle I and II (2011-2025) by opening a door to foreign experts to assess the strengths and weaknesses of the legal framework, policies and anti-corruption practices in Cambodia, as well as by sending out its own experts to review other countries including Saudi Arabia, Malta and Lebanon, have been thoroughly evaluated, summarized, and used as valuable inputs in developing the national anti-corruption strategic plan.

In addition, the standards of Financial Action Task Force (FATF) on combating money laundering and terrorism financing have been reviewed and incorporated into this strategic plan as well. The investigation of money laundering which is the proceeds of corruption crimes, measures and various methods in recovering ill-gotten gains as well as the measures in providing mutual assistance within a bilateral or multilateral framework in the investigation, detection, and recovery of the assets of transnational crimes are the key requirements that must be continued to be implemented in the action plans over the next five years to demonstrate the international communities the Cambodia's high commitment to combating corruption, money laundering and terrorism financing.

1.2.3. Takeaways in the Implementation of all the Three Phases National Strategic Plan

All the three phases of the National Strategic Plan on Anti-Corruption have been developed and implemented with commendable achievements. Priorities tasks including education to strengthen the awareness of the law, consequences and various mechanisms for participating in the fight against corruption have been widely disseminated to all relevant stakeholders, prevention work

has been gradually strengthened to promote good governance in both the public and private sectors, specifically, measures to prevent corruption in the high school graduation examination and other types of examinations have been implemented as well as the examinations in the process to recruit new cadre civil servants, the supervision of public procurement work, participation in verifying and validating the state's budget collection, etc. In addition to those engagements and measures taken, law enforcement, corruption offences suppression and the prosecution have also been implemented in parallel, achieving good results in both quantity and quality, while cooperation with ASEAN and international communities has also been remarkably and positively achieved. These successful tremendous experiences will be used as components, along with inputs from partners and all stakeholders, both within public sectors, civil society, the private sector, and the international community, as well as the general public, both directly and indirectly, to prepare the National Strategic Plan for Phase 4 (2025-2030).

1.3 Comparison between National Strategic Plan Phase 4 (2025-2030) and the National Strategic Plan Phase 3 (2020-2025)

All the 07-pronged approaches include (1). Education, (2). Prevention, (3). Law Enforcement, (4). Policies, Laws, and Regulations, (5). National and International Cooperation and Assets Recovery, (6). Strengthening the Capacity, Internal Governance and Monitoring and Evaluating the Implementation of the Strategic Plan (7). Strategy for Capacity Development and Information Security in Countering Corruption Offenses via AI, which are highlighted in the Strategic Plan Phase 3 2020-2025, will continue to be implemented, including many actions and activities to be refined and adjusted to be in line with the policies and recommendations of the Royal Government and in line with recent developments, both in the national and international contexts, within the framework of the state's ongoing reforms, especially reforms in public finance, public administration, justice and the judiciary, decentralization and de-concentration, and the framework of obligations that Cambodia has both regionally and globally, under the UNCAC implementation review mechanism and mutual evaluation mechanism of the implementation of recommendations issued by the Financial Action Task Force (FATF) coordinated by the Asia Pacific Group (APG).

1.4 The Development of National Strategic Plan, Phase 4 (2025-2030)

So far, we have obtained tremendous experiences, figures and records, inputs provided by the competent practitioners at all levels within Anti-Corruption Unit and all stakeholders from public institutions, the National Assembly, the Senate, private sector, civil society, academia, media, and UNODC experts. Under the recommendations and key guidance of **Kitti Nitti Kosal Pandita, Senior Minister**, President of the ACU and the efforts of the ACU working group, the collected components were synthesized and compiled into a collection of ideas in the form of consolidated document to be reviewed, discussed, and approved by the NCAC. The document has been developed in a form of the National Strategic Plan; Phase 4 (2025-2030) divided into 7 sections which include as follows:

- 1- Introduction: Provides a brief summary of the origins, the rationalization, the preparation of the National Strategic Plan (2025-2030).
- 2- The Review of the Implementation of the Strategic Plan, Phase 3 (2020-2025): Summary of key achievements, the success, challenges, and lessons learned.
- 3-The Analysis of Surrounding Environment: The examination and analysis of the six surrounding environments: Political, Economic, Social, Technological, Legal, and Environmental (PESTLE) and the Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis.

- 4- National Anti-Corruption Strategy (2025-2030): Defining the Vision, Mission, Policies, Values, Goals, Strategies, Monitoring Indicators, and the Linkages Between the Strategic Plan and the Budget.
- 5- Strategic Plan and Budget: Demonstrates the alignment between the Strategic Plan and Program Budgeting, and the availability of budgets to support the implementation of the strategic plan.
- 6- Monitoring and Evaluation: Demonstrates the strengthening of the monitoring and evaluation mechanisms, reporting, and dissemination, as well as the adjustments of the National Strategic Plan, Phase 4 (2025-2030), as necessary.
- 7- Conclusion: Outlines the conclusions, commitments, and expectations in implementing the National Strategic Plan, Phase 4 (2025-2030).

2. Review of the Implementation of the Third Phase of the National Strategic Plan (2020-2025)

2.1. History

The Anti-Corruption Strategic Plan, Phase 3 (2020-2025), accompanied by the ACU Action Plan, was launched by the NCAC on August 28, 2020, comprising 6 strategies, 43 key actions, and 78 activities. Many proud achievements have been achieved in the past 5 years. The review of the implementation of this plan, especially key achievements, successes made, challenges, as well as lessons learned, will help to spearhead the necessary perspectives as well as to make orientation towards the goals for the preparation of the National Strategic Plan, Phase 4 (2025-2030).

2.2. Major Achievements

2.2.1. Education Work

The mission to promote integrity and combat corruption through educational measures to ensure that **“everyone dares not to commit corruption”** continues to be the main strategy, the first pillar, closely linked to other strategies, which over the past 15 years, the government has been working hard to achieve remarkable results, leading to a change in social attitudes towards corruption, to build more trust and confidence in the government, and this change is strong, deeply rooted, and cannot be reversed.

The results of the educational and outreach work that is our responsibility are bearing fruitful, with contributions from all sectors, including the public sector, the private sector, the education sector, the media, the arts and performances, and civil society organizations, working together with the ACU having the adaptabilities with the global and national context; followed by the non-stop approaches coming in various forms, no matter what the circumstances, whether it is when the country and the world are experiencing a crisis, especially during the COVID-19 pandemic, or during the country's recovery and post-crisis period. Overall, anti-corruption education activities are organized in two main areas: in-school education and out-of-school education programs.



Educational Work

In-School Education

General Education

Higher Education

Vocational Schools...

Out-of-School Education

Direct-Modern Broadcasting

Organizing Various Educational Broadcasting Programs

Producing, Distributing, and Broadcasting Educational Media

Commemoration of International Anti-Corruption Day (December 9th)

Study Tours / Site Visits to the ACU Workplaces

In-School Education

In-School Anti-corruption education has been implemented since 2013 under the collaboration between the ACU and the Ministry of Education, Youth and Sports, as part of the integration of anti-corruption education at all three levels (primary, lower-secondary and upper-secondary education) of general education, having prepared a total of 36 lessons for teachers and students and published a total of 825,000 student text books, training more than 500 teacher trainers for continuing education nationwide and to this date, there are a total of more than 50,000 teachers teaching moral-civic education subjects, and more than 2 million students have received training, equipped them with moral values, integrity, and to have their personal efforts in their living, to further their education as well as to take up any profession accordingly and professionally.

High School Level



Middle School Level

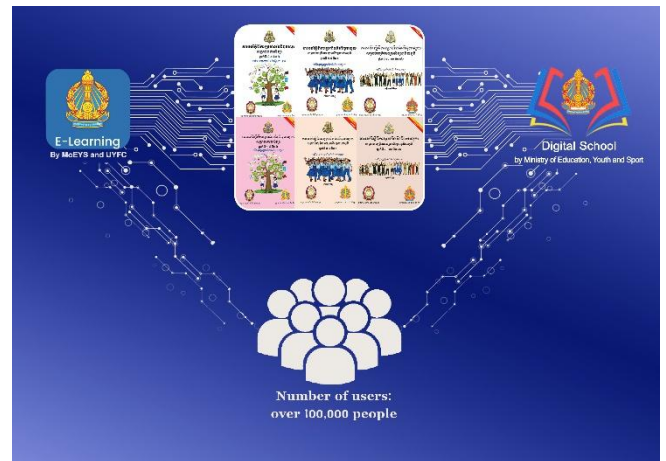


Primary School Level



Anti-corruption education lessons have also been incorporated into the MoEYS E-Learning Application and digital school website for new generation teachers and learners, providing them with easier access for self-study in any circumstances. Since 2017, topics related to anti-corruption have become a benchmark for preparing students for higher education and employment through the introduction of questions on anti-corruption in the moral-civic education subject of the high school graduation exam, which demonstrates the

growing interest in the value of anti-corruption education within the Cambodian education system, as well as to draw the government's attention to anti-corruption education, which encourages the next generation of young people to be more curious about this subject.

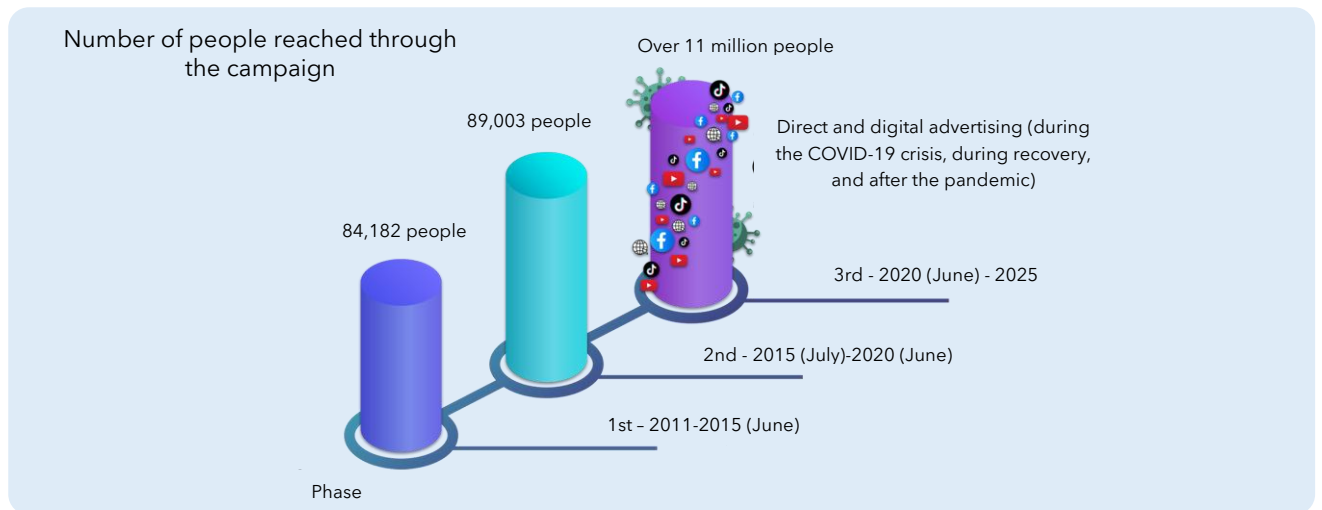


For training at vocational schools and higher education levels, attention is paid to incorporating lessons on anti-corruption into the curriculum by dissemination on the anti-corruption law and teaching lessons on anti-corruption and the code of ethics, which the ACU has prepared, totaling of 6 lessons with the total of teaching sessions of 12-15 hours, considering them as important subjects and the foundation for improving the quality of ethics, integrity, cleanliness, and professional practice.

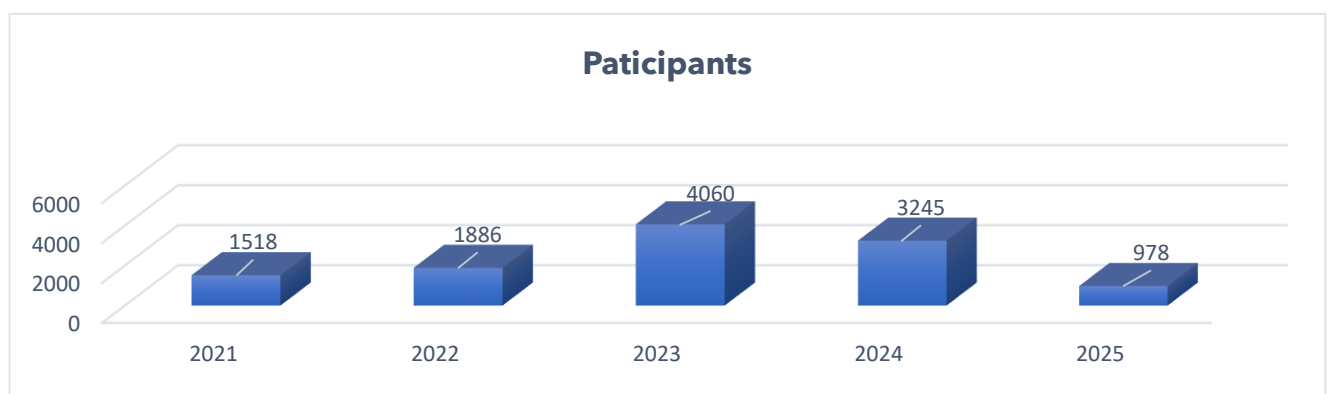
Out-of-school Education

Out-of-school education remains indispensable, and there are ongoing activities to inspire participation in the fight against corruption.

The changing conditions of social life, especially during the COVID-19 pandemic and the beginning of the implementation of the third phase of the Anti-Corruption Strategic Plan, have almost completely cut off direct social contact and the emergence of a technology policy priority, the Industrial Revolution, the ACU has determined the focus on the dissemination using various means, from the traditional to the modern ones, through social media, for educational tools, the government's anti-corruption policy messages – social media platforms- reports - songs, videos or educational content, in which the above campaign has reached more than 11 million social media users in Cambodia, , bringing awareness about anti-corruption to a wider public and almost all circles. At the same time, the ACU has also participated as the speakers to speak on various topics related to anti-corruption on radio, television, and other media platforms.



Despite having achieved the success in educational dimension through the use of media and social media platforms, along with the in-person educational outreach activities continue to be implemented in parallel in the context of the post-COVID-19 pandemic, aiming to better align the educational vision with the set goals to effectively and timely address to all questions and inquiries, and to gather additional direct inputs on perspectives, understanding, and perceptions of anti-corruption strategies, to keep updated with the evolution of the corruption aspects in the society in order to ensure and refine the effectiveness of the anti-corruption strategies. The messenger of anti-corruption related messages of the ACU have conducted the dissemination and outreach activities in the form of lectures on the Anti-Corruption Law and the Law on Amendments to the Anti-Corruption Law to local competent authorities, provincial departments, district/municipal offices, government ministries-institutions, public-private institutions, educational institutions, vocational schools, organizations, offices and places vulnerable to corruption, with a total of 11,687 direct participants include the civil servants, armed forces, teachers, employees of private institutions, and business people by distributing them the anti-corruption related materials and messages produced by the ACU.



The development of relevant programs aimed at instilling the clean mindsets to both students and the public has been ongoing. Obviously, ACU always organize questions-answers sessions to test the understanding about the anti-corruption topic in which the contestants at schools, downtowns, and at the public spaces who have given the correct answers have been awarded the merits and souvenirs to them. In addition to this, there were also the posting of educational content on anti-corruption through its official Facebook page.



"In accordance with Sub-Decree No. 150 SD on the establishment of National Anti-Corruption Day, the National Anti-Corruption Unit organizes annual activities to commemorate this day in collaboration with ministries, institutions, artists, journalists, and the private sector. These efforts aim to raise public awareness about corruption and to mobilize the masses in the fight against corruption in the forms of televised live concerts, media campaigns, direct educational outreach, and the dissemination of anti-corruption messages through various channels, especially targeting local communities. As part of direct education and anti-corruption message delivery efforts, various activities were conducted to engage the public. These included circus performances, small and live band shows in schools, markets, towns, and other public spaces. Interviews were also held with participants to gauge their interest in National and International Anti-Corruption Day, observed on December 9. Additionally, excerpts from anti-corruption education lessons were disseminated to further raise awareness.



Educational Work								
Description	2011 - 2015	2016 - 2020	2021	2022	2023	2024	2025	စုစုပေါင်း
1. Laws Dissemination								
Participants	84,182	89,862	1,518	1,886	4,060	3,245	978	185,731 persons
Target/times	370	569	9	17	35	38	9	1,041 times
2. Educational and Dissemination Tools								
Collection of legal documents related to anti-corruption	130,000	90,000	-	6,000	5,000	10,000	3,000	244,000
Folded card/Poster/Sticker/Calendar	225,100	111,000	-	-	-	-	-	336,100

Music/Educational Spot/Short Video-News	13	33	23	25	74	61	25	254
Anti-Corruption Textbooks (Grades 10, 11 and 12)	145,000	-	-	-	-	-	-	145,000
Anti-Corruption Textbook Books (Grades 7, 8 and 9)	200,000	-	-	-	-	-	-	200,000
Anti-Corruption Textbooks Book (Grades 4, 5 and 6)	-	480,000	-	-	-	-	-	480,000
3. Activities to include anti-corruption lessons into the curriculum								
Training of secondary school core-trainers (Grades 4 to 12)	100	436	-	-	-	-	-	536
Monitoring, coordinating, and providing necessary support for continuing education courses for teachers, particularly those related to anti-corruption education	-	1,618 9 provinces	-	-	-	-	-	1,618 persons 9 provinces
Monitoring, observing the implementation of teaching and learning	4 Schools in Phnom Penh	6	-	-	-	-	-	10
4. National Anti-Corruption Day, December 9								
The Dissemination Programs and Activities for National and International Anti-Corruption Day - December 9								
Target	-	-	-	14	173	47	-	234 target
Participants (persons)	-	-	-	In schools and public places	16,859 and some high school graduates candidates	4,245	-	21,104 persons Some high school graduates candidates and the public
National Anti-Corruption Day Celebration Program, December 9								
Participants (people)	11,385	32,625 Observation of Public Services and Dissemination of Anti-Corruption Content	327 Collaborate with ministries and institutions to produce banners, medals, and videos for social media.	846	2,000	700	-	47,883 persons and over 218,000 persons Like Page accounts

Live Broadcast	Apsara Television and SEATV	Apsara TV 10 TV stations and 3 radio stations Advertisement on social networks	Promote on social networks	Promote on social networks	Town TV Advertisement on social networks	Town TV Advertisement on social networks	-	11 live broadcasts, content broadcast on 10 television stations and 3 radio stations
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2.2.2. The Prevention and Obstruction Work

The second main pillar of the Anti-Corruption Strategy is the prevention integrated measures that complement other approaches, particularly the education one with the aim of ensuring that **'No one can be corrupt.'** Aligned with the global principle that **'the prevention is better than cure,'** it is the prevention strategy operates on two interconnected levels. The first level is **proactive (prevention)**, involving the establishment of legal frameworks and mechanisms designed to close loopholes that enable inactions and corruption. The second level is the **active one (obstruction)** which focuses on monitoring, observing, and reviewing the implementation of existing regulations and mechanisms. It includes taking immediate action to address any identified irregularities and concludes with the evaluation of current systems and to provide the recommendation of measures to address existing gaps.

In the spirit of preventing and combating corruption as our shared responsibility, the Royal Government, with a strong will to support and promote the fight against corruption, has continued to firmly implement the approach of strengthening cleanliness in public administration, enhancing the efficiency of public services delivery, transparency, integrity, and implementing in-depth reform programs in key sectors, including public financial management, justice and the judiciary, and public administration, focusing on laying a stronger foundation for quality, efficiency, modernization, and long-term sustainable development, which makes the prevention and suppression of corruption more effective and systematic. We also note that various ministries and institutions have taken ownership in performing their work and effectively eliminated their inaction.

Key achievements of the prevention strategy include shifting social attitudes toward corruption, strengthening public trust and confidence in a resolute government, improving the efficiency of public service delivery, and increasing national revenue. These outcomes are the result



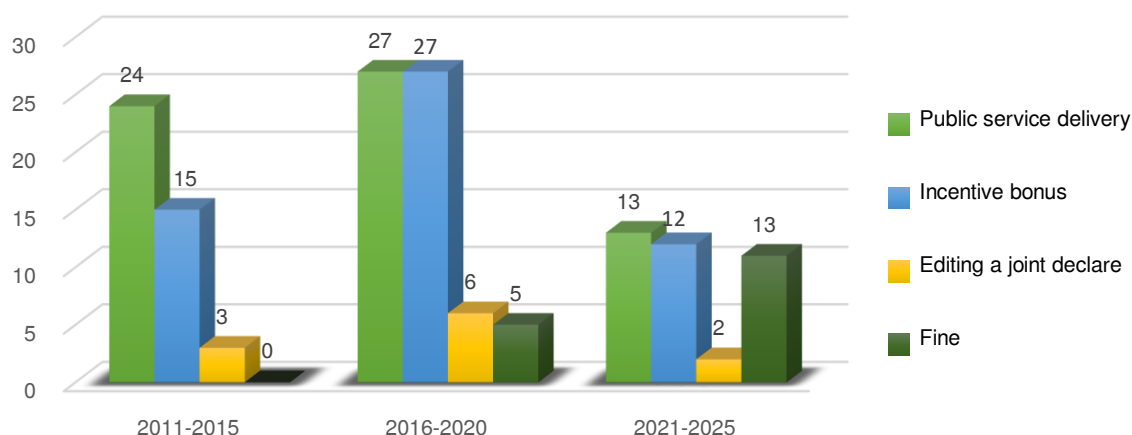
of prevention measures implemented directly by the ACU, as well as in collaboration with relevant stakeholders. These activities are concentrated on 10 key areas of work.

Starting from the Techo 1 campaign in 2012, the Ministry of Economy and Finance, ministries and related institutions involved with the delivering of public services (currently 23 in total), and the ACU have collaborated to prepare and issue a legal framework to strengthen the effectiveness of public services delivery in a transparent, fast, and simple manner, namely the Inter-Ministerial Joint Proclamation on Public Services Delivery, Penalties, and Incentives Schemes. Currently, a total of 134 Inter-Ministerial Joint Proclamations have been issued and are in force, including 78 joint proclamations related to public services delivery and the penalties in cashes, and 56 proclamations related to the distribution of collection of revenues. The joint inter-ministerial proclamations clearly states the types of services, service fees, service delivery times needed, the use of official receipts, services delivery mechanisms that are a single point of entry, receiving and resolving complaints, and are living documents. It is implemented gradually, revised-deleted-introduced gradually, flexible according to social developments, services needs, and various services delivery mechanisms according to the creativity and flexibilities of the ministries and institutions providing the services, with the agreement of the Ministry of Economy and Finance, which is the focal institution in charge of the national financial policy, and with the participation of the ACU in providing inputs on aspects of preventing and combating corruption.

The implementation of the Inter-Ministerial Proclamations has been recognized as having mobilized increased budget revenues, created and increased the environment of ease of doing business, and achieved the goal of making public services delivery more effective, especially after many ministries and institutions providing public services at both the national and sub-national levels have developed and organized their management and services delivery mechanism through the introduction of the information technology with the traceable record systems, reducing opportunities for inaction, making the delivery of services on time, easier, and simpler, in the direction of achieving the slogan put forward by **Samdech Moha Bovor Thipadei HUN MANET** Prime Minister of the Kingdom of Cambodia, “Good public service people love and support.”

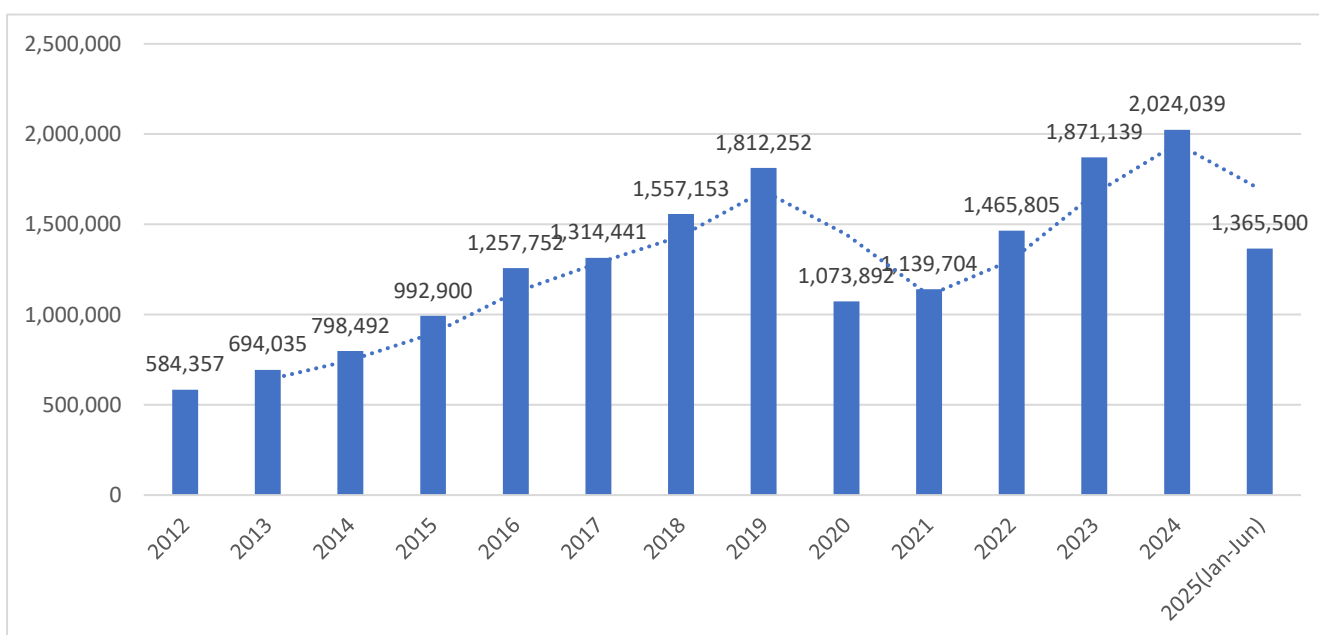


Adoption of joint inter-ministerial statements on improving public service delivery.



Joint inter-ministerial statement regarding public service provision

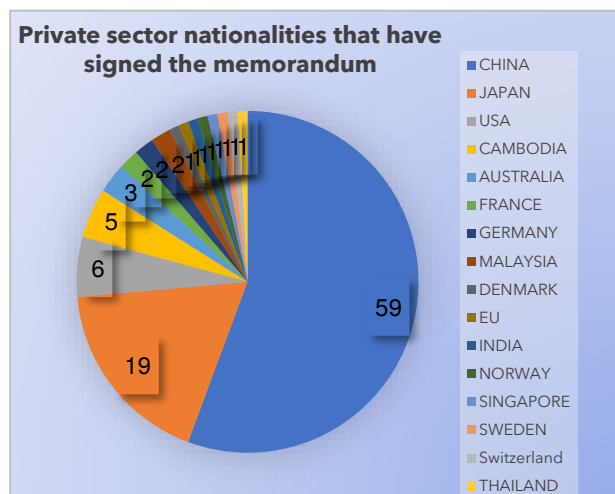
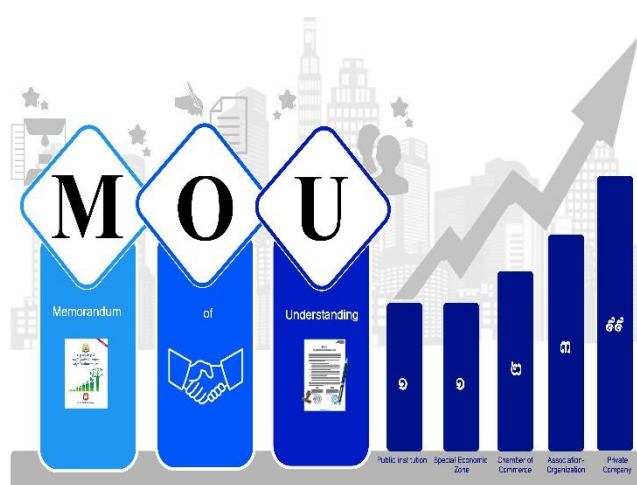
Data on revenue from public service provision and fines (unit: million riel)



Total revenue growth over 14 years is 16,582,960 million riel (last 5 years 6,500,687 million riel)

The private sector and ACU initiated a **Memorandum of Understanding (MOU) on Anti-Corruption Cooperation** in 2013, which has now increased to 106 MOUs covering more than 1,000 companies of 16 nationalities, with the private sector providing education, committing not to commit corruption, and reporting corruption cases to ACU. Cases encountered through the anti-corruption focal point as stated in the MOU and the ACU receive those complaints and resolve them effectively. The obligations and commitments between the parties have continued to be strictly adhered to, creating a clean business environment and resolving the concerns of the private sector in a timely manner with high attention, as a fruitful example, attracting additional participation as parties with

the ACU. The private sector has also downloaded the contents of the guidebook on the anti-corruption program for businesses in Cambodia prepared by the ACU and the private sector to use and implement for the benefit of building internal integrity and fighting corruption.



Sector-based corruption risk assessments have become a global trend, used to identify the root causes of corruption with the aim of introducing and implementing appropriate anti-corruption measures. Following the COVID-19 crisis in 2022, the United Nations Office on Drugs and Crime (UNODC), in collaboration with the ACU, the Ministry of Health and relevant stakeholders, began piloting the first pilot workshop on assessing the risk of irregularities in the health sector as a basis for further implementation in other sectors at an appropriate time.

In the past, the Royal Government of Cambodia, under the great and wise leadership of **Samdech Akka Moha Sena Padei Techo HUN SEN**, has promoted the strengthening of good governance in public administration by developing and implementing many legal documents, such as the Code of Professional Ethics and the Five Pronged Approaches, which ministries, institutions and organizations adhere to as a means of building content and mechanisms to strengthen internal integrity, creating professional work behavior and accountability among public officials. The development of a code of conduct for public officials has become a continuing goal in the work of building a clean public administration. The code of conduct for public officials is a legal document that sets out the rules of conduct for public officials to follow in the performance of their duties. The code of conduct focuses on what actions must be taken and what actions are prohibited, as well as sanctions for failure to comply with the code of conduct, with the aim of making public officials act with integrity, perform their duties correctly, be highly responsible, respect professionalism, avoid conflicts of interest and improved the efficiency of public services delivery. With this work strongly linked and is the key to combating corruption, ACU, the UNODC, the Ministry of Civil Service, and relevant parties have organized a series of workshops to collect input on the topic, and in 2019, the Royal Government has assigned this important task to the Ministry of Civil Service as the focal institution to organize, ensure the implementation, and monitor and evaluate the Code of Conduct. Continuing on this foundation, the current Royal Government led by **Samdech Moha Borvor Thipadei HUN MANET, Prime Minister** has firmly stated in the core of the Pentagon Strategy, in angle 3, Enhancement and Strengthening of Accountability and Integrity in Public Administration regarding the first priority on Developing and Implementing a code of conduct in civil service. Ministry of Civil Service has been continuing to study and prepare for this task, and ACU has also assigned focal officials to attend meetings to discuss and provide inputs on the vision of combating corruption and jointly promote fruitful decisions on this task.

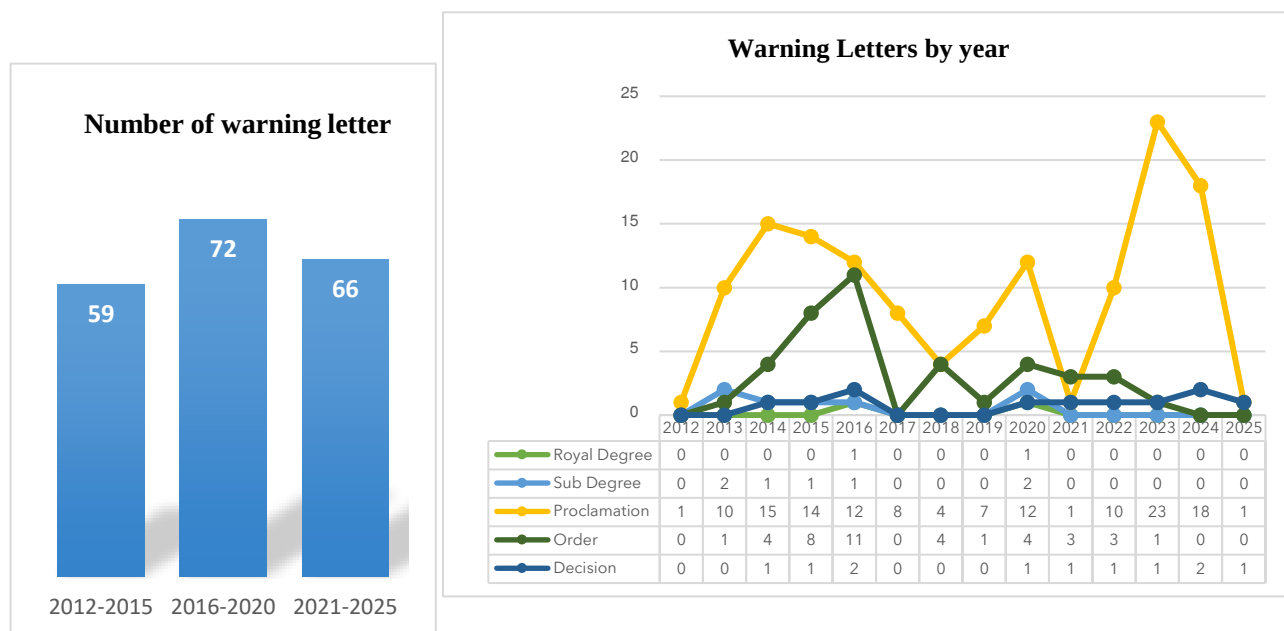
The Declaration of Assets and Liabilities, the Anti-Corruption Law defines the composition of individuals who are obliged to declare assets and liabilities, and the procedures in declaring assets and liabilities are determined by decisions of the Anti-Corruption Unit. The declaration of assets and liabilities is a historic work of the Kingdom of Cambodia that was developed as a tool to prevent corruption and this declaration is also used to effectively investigate offences in many cases as well and involved in other prevention works such as: 1- as a verification tool, or comparing the latest asset and liability declaration with the first and subsequent declarations to detect assets that have increased without reason and cannot be explained or illegally acquiring property or using it as a system to track changes in the property of government officials, 2- used as evidence to testify in the court hearing, 3- help prevent any government official who wants to gain wealth illegally or engage in improper behavior, 4- help protect innocent officials from unfair accusation, 5- help instill a sense of law and professional ethics in general government officials, 6- help promote integrity and dignity in government officials, and 7- help to inspire government officials to be clean, honest and responsible.

The declaration of assets and liabilities is carried out successfully and high responsibly. The figure of declaration of assets and liabilities as prescribed by law including the two-year regime declaration, new appointment, resignation/end of the mandate, the termination from office or retirement, is close to 100%.

The declaration of assets and liabilities may be extended its scope to other targeted groups as required by law.

Prevention and obstruction related to receiving documents for declaring assets and liabilities												
Description	2011-2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total
As required	24,196	00	00	00	00	00	00	00	00	00	00	24,196
2 years regime	46,128	7,129	21,445	5,747	21,841	12,503	24,386	14,510	22,525	17,967	22,353	216,534
New appointment	13,899	1,977	8,367	8,173	5,141	2,989	1,835	7,689	3,740	3,502	827	58,139
Resignation	6,464	137	4,127	500	1,496	361	276	4,698	512	2,266	364	21,201
Termination	107	10	1,035	3,888	54	30	35	29	28	34	04	5,254
Retirement	346	90	202	97	790	706	1,024	942	1,263	1,074	215	6,749
Investigative requirements	20	10	00	00	21	03	01	02	01	05	03	66

Warning is a high-level preventive measure that ACU issues letters containing warnings to specific individuals who, in the initial stages, fail to comply with specific laws and regulations in force in the sense of reminding to correct and encourage the warned individual to abide by various legal standard provisions and to have the proper professional conduct. Specific individual receiving warnings are posted with warning letters at their respective units and are required to report to ACU every 3 months for a specified period of time (generally one year) about the implementation of work in their ministries and institutions and other tasks assigned by the leadership as a self-reflection mechanism and ACU continue to monitor the specific individual's behavior to determine next steps (ACU will educate the specific individual, have him/her finish - continue self-reporting, receive another warning, or require the implementation of law enforcement measures). Over the last 5 years, many



specific individuals have received warnings and reminders to change their inappropriate practices.

In obstruction strategy, ACU also focused on observation work, which includes 1). Examinations, 2). Public procurement, 3). Bidding and non-tax revenue collection, and 4). Reform and management of various public assets.

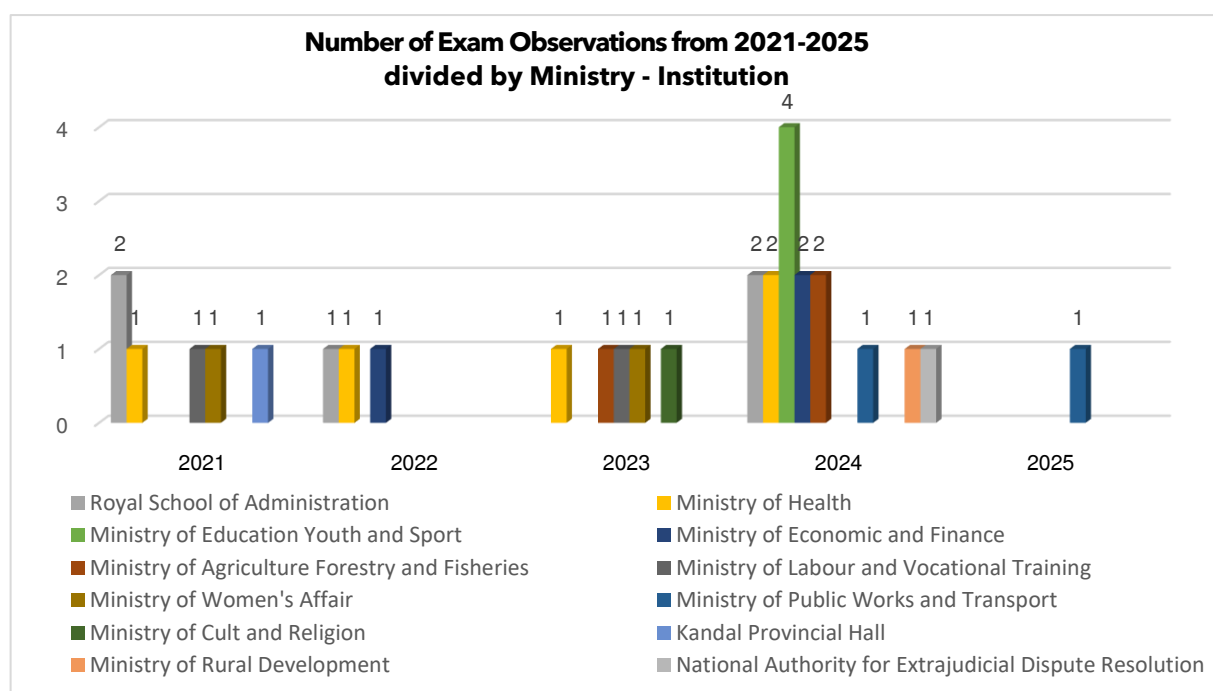
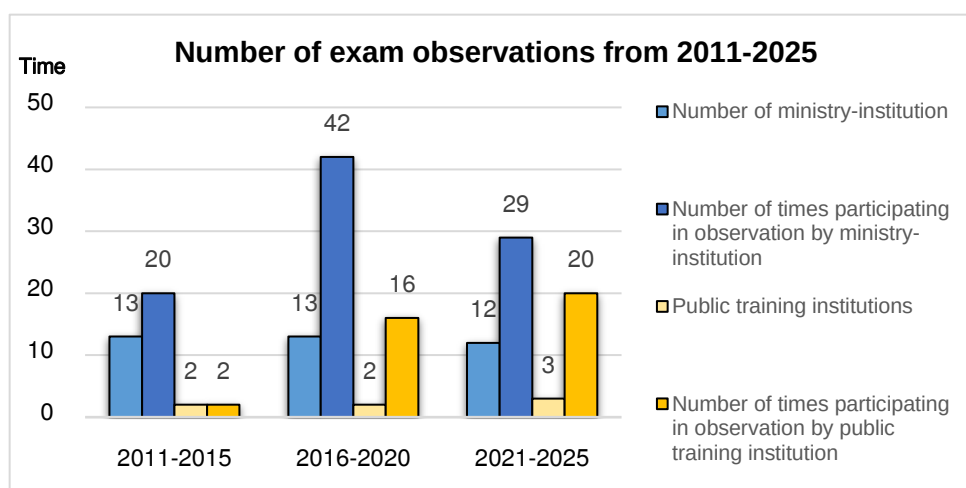
The Reform made at the National Upper Secondary School Graduation Examination (BACII), **“Those who are competent shall surely pass the exam”** is carried out since 2014, in the 5th mandate of the Royal Government led by **Samdech Techo HUN SEN**, which is historically successful, continue to maintain its success, support, and acclaim from all circles without ceasing, by having Ministry of Education, Youth and Sport as a focal point in implementing this work for the Royal Government and there is enthusiastic cooperation and support from other institutions, national and sub-national stakeholders, having ACU participated as the observers for 11 times with the deployment of more than 5,000 volunteer observers at each time throughout the capital, provinces, and all exam centers, in which all those volunteer observers have attended training courses on the roles and duties to perform in the observation work. It is noteworthy that the enthusiasm of youths to participate in the fight against corruption and to ensure the fairness in the exams has never diminished. In general, within the past 10 years, in a short period of time, ACU was able to recruit a certain number of volunteer observers (in one day, ACU could mobilize more than 3,000 volunteer observers) and those volunteer observers fulfill their roles and duties with care and accomplish the tasks assigned by the ACU well.

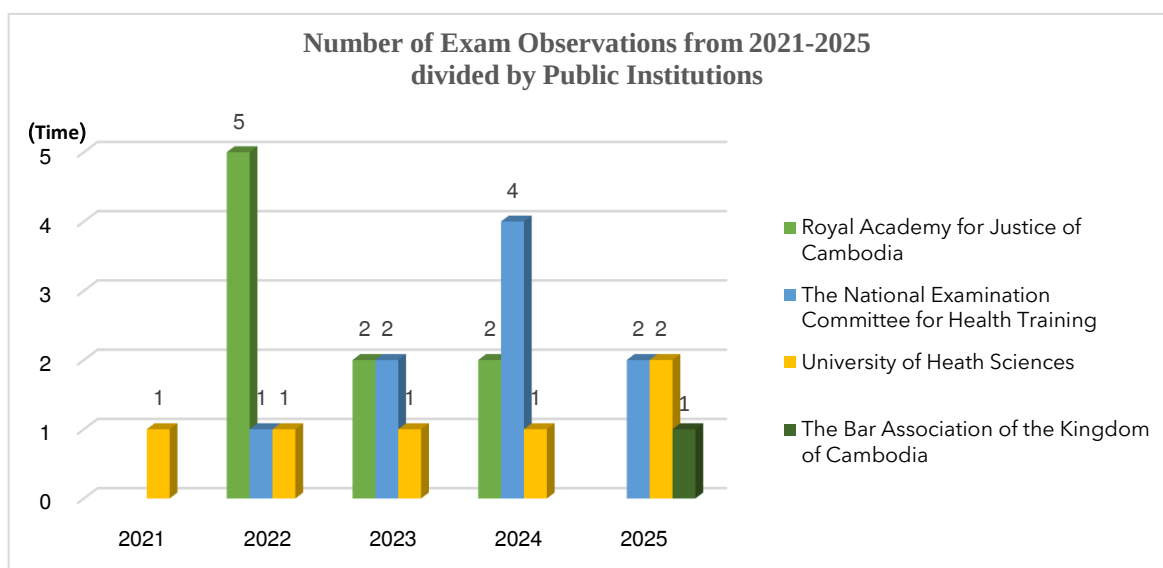
Description	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	
ACU Official	166	174	179	225	305	349	75	-	75	277	315	325
Volunteer Observer	2,549	3,101	5,023	5,676	4,578	5,267	-	-	-	2,897	3,040	2,514
About Examination												
Center	154	117	150	157	178	196	202	-	204	221	227	230
Room	3,683	2,752	3,576	3,781	4,154	4,655	4,725	-	4,615	5,174	5,543	5,636
Candidates	91,393	60,611	84,930	93,752	103,112	115,268	117,043	-	114,187	128,134	137,412	137,047
Result of Examination												
%Pass	25.72%	17.94%	55.88%	62.18%	63.84%	67.07%	68.62%	Automatic-ally Passed	65.65%	72.33%	72.89%	79.00%
Garde A (Person)	11	-	108	405	424	408	443	-	1,753	1,049	1,673	2,216

In the 5th and 6th mandates, ministries and institutions also conducted the exams to recruit new cadre government officials, selecting competent students with high-quality assurances, just like the results achieved at the upper secondary school graduation exams. The 7th mandates of the National Assembly, led by the Royal Government **Samdech Moha Borvor Thipadei HUN MANET, Prime Minister** continue to raise the banner of reform and to assure the quality improvement in all examinations under the slogan **“Pass with pride, Fall With Grace”**, starting from the beginning of the mandate, a new recruitment process for civil government official recruitment examinations has been launched, with the Ministry of Civil Service led by **His Excellency Deputy Prime Minister HUN MANY**, as a focal point, directly lead the implementation and prepare all of the civil government official recruitment examinations based on the principle **Meritocracy, Transparency, Justice, Inclusiveness and Efficiency** to ensure transparency, equal opportunities, and fairness for all candidates, it is necessary to have ACU participate in the observation. In the last 5 years (2020-2025), in the role as a transparent mirror, ACU have participated in observation:

- a). Civil government officials, officials’ trainees, and contracted officers’ recruitment examinations, in a total of 13 ministries and institutions, equivalent to 30 times, including the abide by to the new examinations operating procedures for 8 ministries and institutions, equivalent to 17 times for the civil government officials and officials’ trainees’ recruitment examinations in a total of 4,179 candidates out of 115,030 eligible candidates participated in the exams.

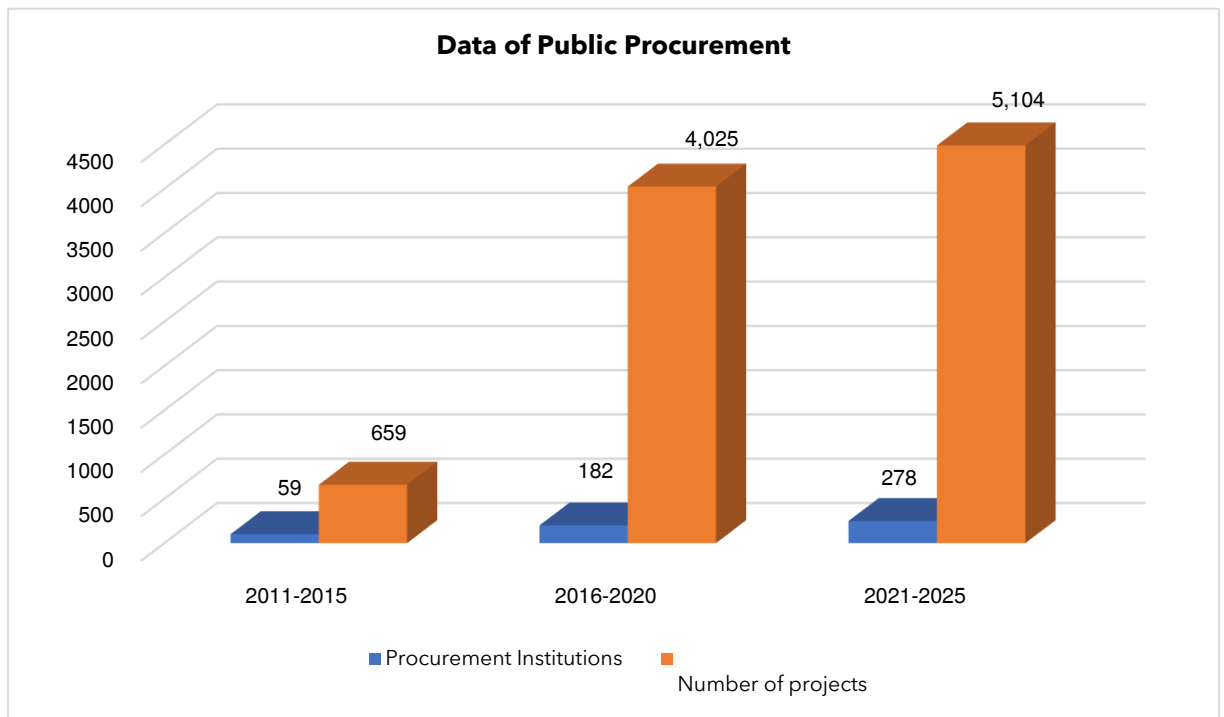
b). The examinations for the selection of students at public training institutions such as 1. Royal Academy for Justice of Cambodia, 2. Health training institutions (candidates entering/graduating), 3. University of Health Sciences (admission to a specialized master's degree/specialized medical doctor) and 4. The Bar Association of the Kingdom of Cambodia in a total of 25 times.





ACU participates in public procurement to ensure that the use of the national budget is cost-effective, transparent and accountable, with this work done in an open and confidential manner at all stages of public procurement. ACU has also set up a public procurement data management system to gather information related to procurement units, the information related to the procurements, information related to the companies participated in the procurement, and other relevant remarkable notices available to facilitate analysis, evaluation, monitoring and necessary actions needed to be taken. In the COVID-19 epidemic, **integrity in public procurement** has become a heating topic, especially due to the urgent need for strategic goods, and Cambodia has put in place precautionary measures to ensure integrity, transparency and cost-effectiveness through:

- The Head of the Royal Government of Cambodia has sent a message reminding and urging to strictly adhere to the approach of **"Self-Reflection, Bathing, Scrubbing, Treatment, and Surgery"** in the performance of work and not to exempt or tolerate the corruption of any person.
- Urgently set up the Ad-hoc Working Group in charge of the supplies of goods and cost management during the period of fighting against COVID-19 pandemic that is responsible for determining the type of goods, strategy, quality control, cost management, ensuring the sustainability of supplies, with a diverse composition of senior management from all relevant units involved, as well as to ensure the monitoring mechanisms having the Law on Public Procurement which stipulates that public procurement is subject to audit and inspection by the Ministry of Economy and Finance and relevant authorities including the Anti-Corruption Unit and it was also supplemented by a statutory audit and a requirement to maintain audit evidence for at least 10 years.
- In general procurement within the Procurement Unit, ACU continued to fulfill their role in the prevention of any irregularities by changing its approach from the direct observation to the review of relevant documents in the procurement process, to identify any errors or suspicious and take measures to resolve the irregularities or complaints related to procurement.



In strengthening transparency, efficiency of revenues collection and sustainable management of natural resources, ACU also participated in 59 observations.

In addition to the above observation work, ACU participates in other observations as necessary or at the request of ministries, institutions, and state's public enterprises to demonstrate transparency and accountability, such as reform on telecommunications in Cambodia, granting land to protect the forest program for the sake of joint sustainable development, the management of the state land around the Tonle Sap region, and Prey Long Wildlife Sanctuary protection.

Prevention and Obstruction								
Description	2011-2015	2016-2020	2021	2022	2023	2024	2025	Total
Strengthening Efficiency and Transparency in Public Services Delivery								
Ministries and institutions that joint-proclamation on public services delivery	22	15	4	3	2	8	5	23
Joint-proclamation on public services delivery	24	27	1	3	3	5	4	67
Joint-proclamation on the revision of the Public Services list	3	6	-	1	0	1	-	11

Joint-proclamation on fines	-	5	5	1	3	2	-	18
Joint-proclamation on incentives	15	27	5	1	0	6	3	57
Monitor public services delivery	1 Sub National	12 National 38 Sub National	-	-	-	-	-	12 National 39 Sub National
Strengthening Targeted Works on Observation								
Observe the public procurement at ministries and institutions (Institution/Time)	59/659	182/4,025	133/787	193/1,261	176/1,280	148/1,143	111/633	451/9,788
The bidding process of evidence/proceed of crimes and Non-Timber Forest Product (Province/Time)	14/23	6/10	-	1/1	-	-	-	15 Capital Provinces/ 34 times
The bidding process of fish (thynnichthys thynnoides) and shrimp (Province/Time)	3/11	3/33	3/3	3/3	3/3	3/6	-	3 Capital Provinces/ 59 times
Observe new cadre official recruitment examination at public institutions (Ministries/times)	15/22	15/58	6/7	6/10	8/10	11/22	4/6	26 Ministries- Institutions 129 times
Observation of the National Upper Secondary School Graduation Examination								
ACU officials (person)	179	349	75	277	315	325	-	349
Volunteer observers (person)	10,673	15,521	-	2,897	3,040	2,514	-	34,645
MOU on Anti-Corruption Cooperation								
Private sector	20	72	3	2	1	1	0	99

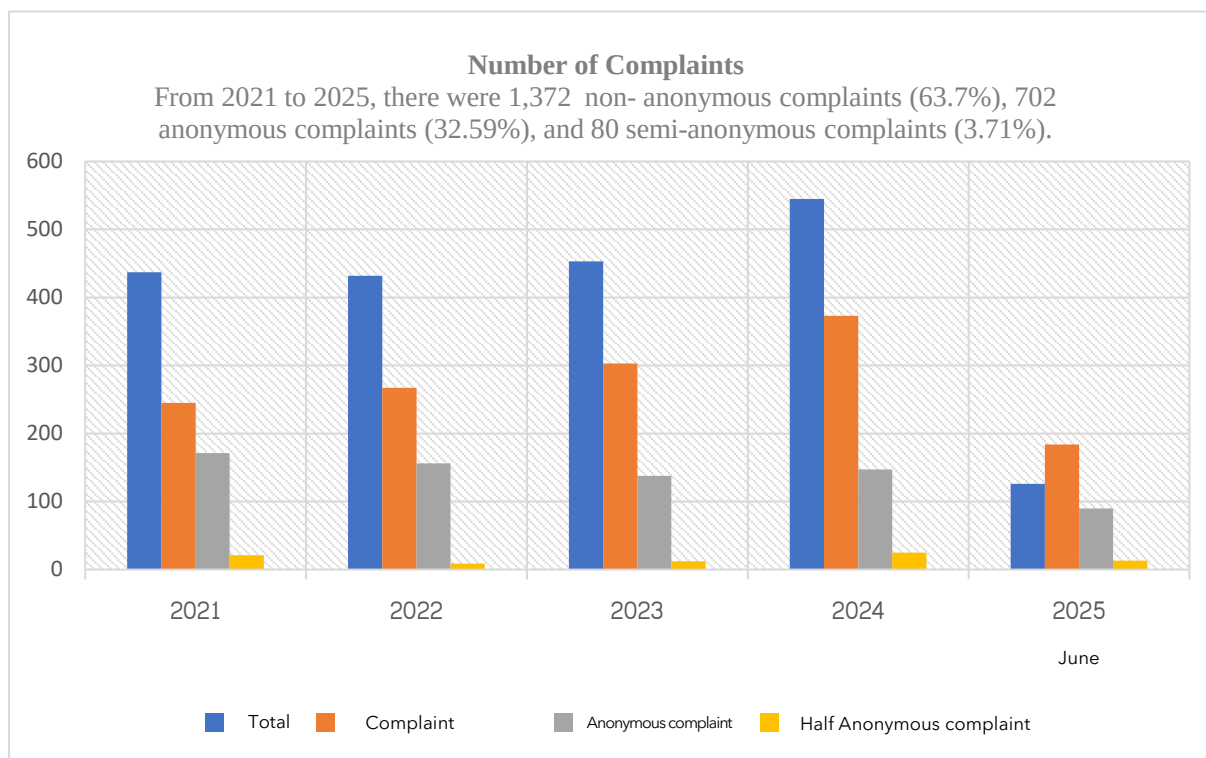
Association	0	3	0	0	0	0	0	3
Chamber of Commerce	1	1	0	0	0	0	0	2
Special Economic Zone	0	1	0	0	0	0	0	1
Public institutions	1	0	0	0	0	0	0	1

2.3. Anti-Corruption Law Enforcement and International Cooperation

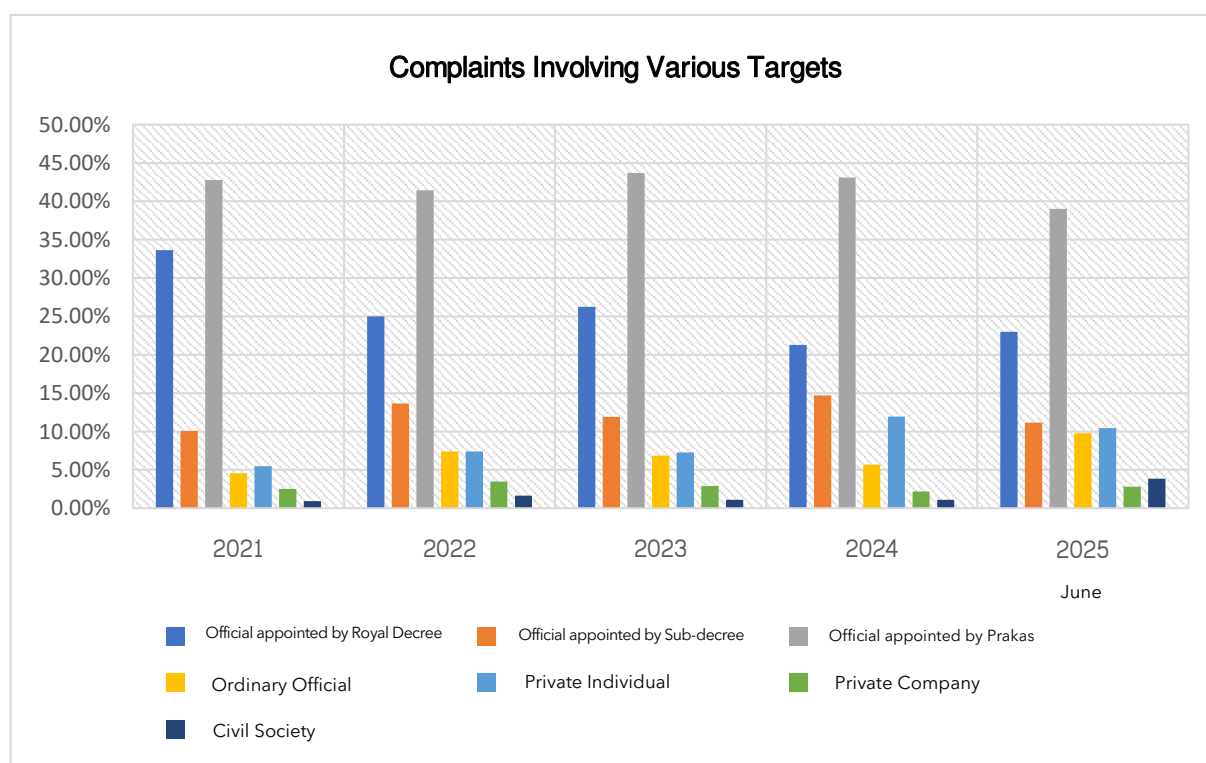
2.3.1. Anti-Corruption Law Enforcement

The enforcement of the Anti-Corruption Law is a measure established in the Anti-Corruption Law, aimed at deterring individuals from engaging in corruption. The measures include filing cases to the competent courts so that offenders can be held accountable under the law and recovering all the proceeds of crimes. Over the past 15 years since the Anti-Corruption Law was promulgated in 2010, the National Council Against Corruption has consistently included the enforcement of the Anti-Corruption Law as a key action of its anti-corruption strategy. The enforcement of the Anti-Corruption Law is carried out alongside education and prevention efforts. Regarding the development of the legal framework, apart from the Anti-Corruption Law, corruption offenses are also stipulated into several other laws, such as Law on Management, Use, and Disposal of State Property, Laws on Public Procurement, Law on the Management of Non-Taxes Revenue, Law on Taxation, and Laws on Inland Water Transport, all of which the power and authorities have been granted specifically to the Anti-Corruption Unit (ACU) in the scope of the investigating corruption offenses.

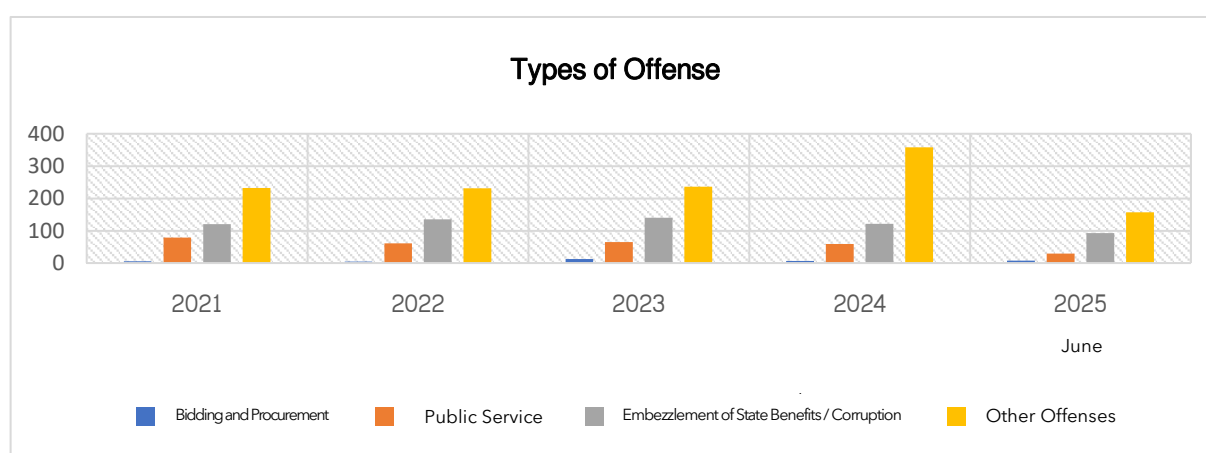
Through experience and the evolution of the context of the country's development over the past period, and to further enhance the quality, effectiveness, and efficiency of dealing with the complaints submitted to the ACU, the mechanisms for receiving and resolving complaints have been continuously improved, receiving positive feedback from complainants, the public, and stakeholders. The ACU has worked hard to expand the scope and means of receiving complaints, including creating the complaint template posted on the ACU's website, installing more complaint boxes along the roads and within 25 the capital city/ provinces, receiving complaints through various social media platforms, and collaborating with Cambodia Posts Office to facilitate the launching of the mechanism to receive complaints lodged at all post office branches across the provinces and Phnom Penh capital free of charge. Complaints submitted to the ACU include non-anonymous complaints, anonymous complaints, and semi-anonymous complaints. It is noteworthy that in the implementation of the third phase of the strategic plan (2020-2025), the number of non-anonymous complaints account for as much as 63.7%, indicating the trust of complainants in the ACU.



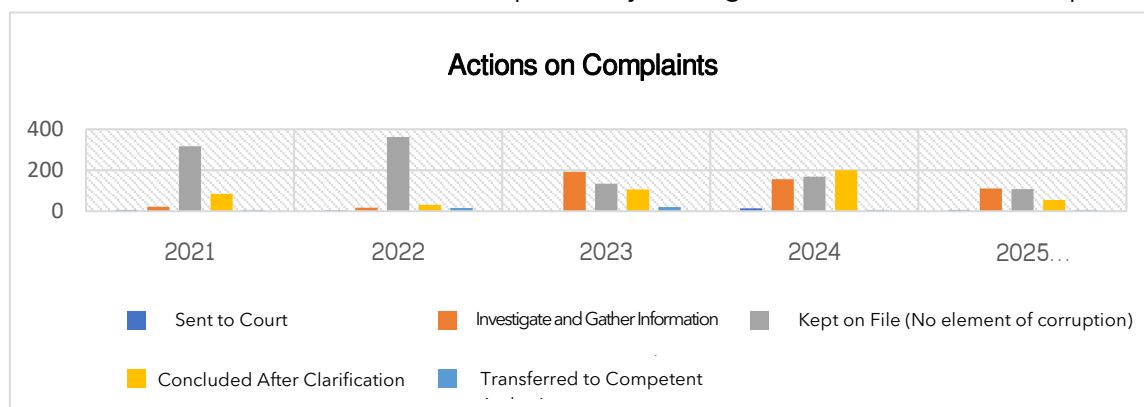
All received complaints can be the complaints filed against any official or group, including ordinary officials, officials appointed by ministerial proclamation, officials appointed by sub-decree(Prime Minister's approval) , officials appointed by Royal Decree (His Majesty the King's approval) , and even up to the senior leaders within ministries and institutions, as well as the staff working in the civil society and some private individuals, and these complaints are examined and resolved on a case-by-case basis, in accordance with the responsible and professional working's ethic.

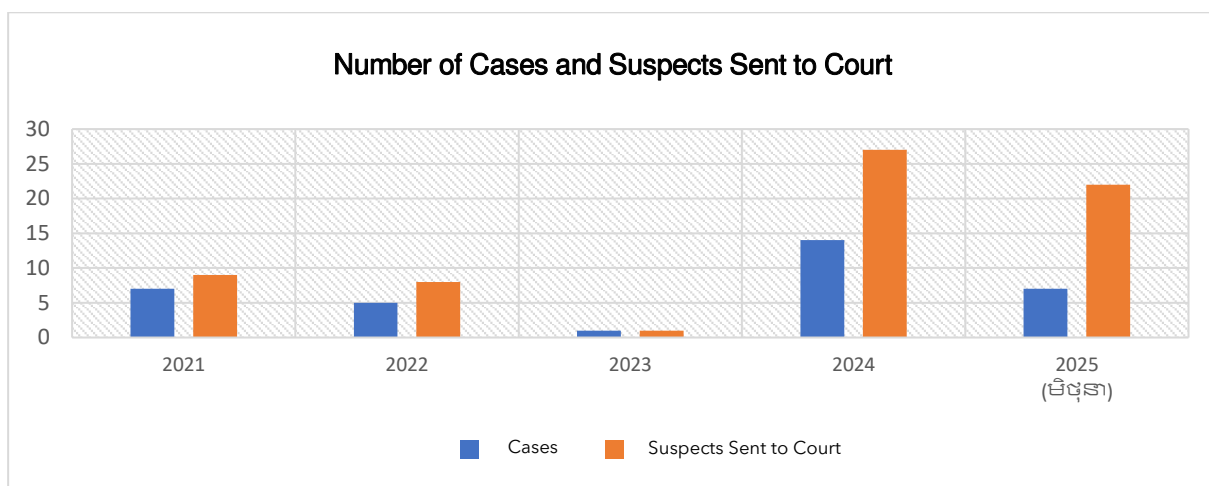


As a procedure for resolving complaints, the designated team in charge of complaints has organized and coordinated meetings to review and resolve complaints during breakfast complaint review meetings known as (BM) starts every morning at 07:30 on the working days. This complaint review meeting is conducted to review, discuss, and take action on complaints submitted the previous day. The meetings are also open to complainants and their lawyers to come in and listen to the analysis, reasonings, as well as to provide additional evidences regarding the cases being complained about. The direct participation of complainants in the process of reviewing and discussing their complaints lodged to ACU has fostered trust, appreciation, and support for the ACU's ongoing efforts to take action and deal with all the lodged complaints. In the process of resolving complaints, information gathering and investigation are also conducted making sure that information received from both open and intelligent sources, under strict principles and confidentiality of the sources and witnesses, both within the ACU and externally, especially when cases are to be filed to the competent courts; the security and confidentiality of those sources and witnesses are the life and dead of each case which cannot be compromised.



Among all the complaints that have been going through the review and discussion within the complaint review meeting, some of those complaints have been found either not involved with corruption or involved with corruption offenses. For complaints that do not have sufficient substance to be proceeded or do not indicate corruption, they will be kept for further follow-up and observation or to issue a letter to the complainant clarifying that their complaint submitted was not involved with the competent authorities of ACU or to issue the referral letter for an intervention to the concerned ministries or institutions whose authorities are involved with the complaints. In contrast, the complaints that may involve with the corruption offenses will be under the further proceeding by the Complaint Officer or specialized team in charge, working to request further clarification from relevant individuals, conduct the further analysis and information gathering, to investigate, to conduct forensic examinations, and assess the possibility of filing cases to the relevant competent courts.





From the experiences and the past practices, it showed that the fight against corruption is not solely reliant on filing cases to the court. This is due to the fact that filing cases to court requires strong evidence, expertise, and significant time, along with many other inevitable factors to ensure the success of each case. Besides submitting cases to court, complaints that are not yet available or cannot be made, or where evidence has been lost and cannot be used to file cases to court, are resolved through the collaboration made with anti-corruption focal-points through both administrative and disciplinary measures. Those administrative and disciplinary resolution have contributed to strengthening the integrity within public institutions and have really created a snowball effect, reinforced desired outcomes and prevented the repetitive mistakes from happening again, self-correction, reducing irregularities, and moving towards eliminating issues that have arisen. The growth of administrative and disciplinary measures, resulting from collaboration with anti-corruption focal-points within ministries-institutions, along with the need for and necessity in obtaining solid and convincing evidence, generally requires time, experience, and professional expertise, jointly combined to create the explanations for the following phenomenon:

1. Cases filed to court are not excessively numerous.
2. Cases filed to court achieve the 100% successful rate of conviction.

To ensure that the ACU's officials are competent and qualified to conduct the investigation corruption offenses and related offenses that are complex, evolving in the new context of technology and globalization, it does require that the capabilities and professional skills, including information gathering, detecting, intelligence, financial forensic analysis and computer technology, and financial analysis, as well as the capacity of filing cases to court those officials are continuously strengthened and expanded in their daily working routine. In addition to skills and capabilities, ACU officials are also reinforced in discipline and have made concerted efforts to fulfill their duties with responsibility, integrity, and high professionalism, as well as collaborating with all relevant parties to successfully deal with all the complex cases.

Results Achieved On the Enforcement of Anti-Corruption Law								
Description	2011-2015	2016-2020	2021	2022	2023	2024	2025 (June)	Total
1. Sources of Complaints								
White Mailboxes	1,870	1,288	182	183	163	184	47	3,917
Direct Complaints at ACU	1,156	1,170	206	217	255	313	59	3,376
Email	457	112	15	12	8	26	10	640
Messenger	344	127	-	-	5	2	-	478
Facebook	-	128	15	13	14	5	-	175
Phone	80	52	-	-	1	-	-	133
Post Office	42	50	6	5	-	9	7	119
Telegram	-	7	-	2	5	4	3	21
Media	-	3	12	-	2	2	-	19
Fax	6	0	-	-	-	-	-	6
ACU Page	-	1	-	-	-	-	-	1
YouTube	-	0	1	-	-	-	-	1
2. Numbers of Complaint								
Total	3,955	2,938	437	432	453	545	126	8,886
Anonymous	1,922	1,148	171	156	138	147	46	3,728
Semi-Anonymous	-	145	21	9	12	25	6	218
Non-anonymous	2,033	1,645	245	267	303	373	74	4,940
3. Complaints Involving Target								
Officials Appointed by Royal Decree	18%	24.60%	33.64%	25%	26.27%	21.28%	23.02%	

Officials Appointed by Sub-Decree	14%	12.20%	10.07%	13.66%	11.92%	14.68%	7.94%	
Officials Appointed by Decree	31%	33.20%	42.79%	41.44%	43.71%	43.12%	41.27%	
Ordinary Officials	22%	21.40%	4.58%	7.41%	6.84%	5.69%	11.90%	
Private Individuals	12%	8.00%	5.49%	7.41%	7.28%	11.93%	10.32%	
Private Companies	-	-	2.52%	3.47%	2.87%	2.20%	2.38%	
Civil Society	2%	1.28%	0.92%	1.62%	1.10%	1.15%	3.17%	
4. Warning Letters to Civil Servants								
Warning Letters	478	72	5	14	25	20	1	615
5. Actions on Complaints								
Sent to Court	52	34	7	5	1	14	4	117
Research and Information Gathering	2,132	1,241	22	17	192	156	60	3,820
Archive (No Corruption Indication)	476	937	317	363	134	168	35	2,430
Closed After Clarification	406	696	84	31	106	200	24	1,547
Transferred to Relevant Authorities	267	30	7	16	20	7	3	350
6. Types of Offenses								
Public Services	301	316	79	61	65	59	13	894

Bidding and Procurement	84	66	6	5	12	7	5	185
Misappropriation of State Interest/ Embezzlement	1,143	631	120	135	140	121	38	2,328
Other Offenses	2,427	1,885	232	231	236	358	70	5,439
7. Number of Cases and Defendants Sent to Court								
Cases	52	33	7	5	1	14	4	112
Suspect Sent	61	37	9	8	1	27	10	153
8. Recovery of Assets from Offenses								
Verdict	2	7	5	3	1	7	-	25

2.3.2. National and International Cooperation

In a context where the world is rapidly evolving, especially in the current technological and innovative environment filled with dynamic and proactive mode, the fight against corruption cannot be successful and efficient by merely adhering to mode of traditional practices. In this sense, it is clear that we all need to work together with all concerted effort made to address the global issue of corruption, which is the common problem that becomes more pressing and burdensome, requiring participation from all relevant parties at the national, regional, and international levels. The necessity and importance of national and international cooperation are clearly outlined in the Anti-Corruption Law.

Within the framework of national cooperation, the ACU, as the leading institution in the fight against corruption, collaborates with anti-corruption focal points, public ministries and institutions, the private sector, and civil society to implement various efforts aimed at educating and preventing corruption through collaborative training, disseminating the Anti-Corruption Law, developing legal frameworks, producing anti-corruption educational materials, taking part in the observations, developing and putting in place all the public services packages and signing MOUs with private sector, are those among many other activities fulfilled so far. Regarding the enforcement of the law, the ACU has also collaborated with relevant ministries and institutions, including the competent court bodies, to share and update all relevant information as well as to organize the capacity-building training programs subsequently.

In the framework of international cooperation, the ACU, as Cambodia's leading institution in combating corruption, has actively collaborated and worked with international partners and has continuously strengthened and expanded this partnership, achieving notable results.

- 1) **Implementation of the United Nations Convention Against Corruption (UNCAC):** The ACU is the coordinating institution for the reviewing process of UNCAC implementation cycle 2 in Cambodia, which was reviewed by experts from Thailand and Eswatini, with assistance

from UN experts, focusing on preventing and combating corruption and asset recovery of proceeds of crimes. This process involves participation from all relevant parties, including legislative institutions, executive institutions, judicial institutions, the private sector, civil society organizations, development partners, and academic institutions, receiving applauses from stakeholders and the gratitude and appreciation from the United Nations. Meanwhile, ACU also successfully completed the UNCAC implementation review cycle 2 in Cambodia. In this regards, ACU experts as the representatives of Cambodia together with the experts representing the United Nations also conducted the UNCAC Review implementation, Cycle 2 in Kiribati and Lebanon. At the time that ACU representatives conducted the UNCAC Review implementation in Lebanon in 2024, the ACU's experts were arranged to have the courtesy call and discussion with the Prime Minister of Lebanon to meet and discuss on anti-corruption efforts in a constructive manner. Currently, the implementation of the review of UNCAC cycle 2 in Kiribati and Lebanon has been successfully completed.

- 2) **Combating Money Laundering and Terrorism Financing:** The task is both involved with political and technical aspects, the task is broad, and complex, involved cross-sectors in term of its nature and scope. So far, Cambodia has considered this task as very crucial, necessary, and urgent, and the task involving the AML/CFT/PF is always regarded as the economic momentum that could negatively affect the economic and financial system of the country. Therefore, the Royal Government, the ACU, and relevant ministries and institutions consistently pay attention to and strive to implement this task respectively in accordance with to their designated mandates. The National Bank of Cambodia (NBC), having Cambodia Financial Intelligence Unit (CFIU) as its assisting unit, is the leading agency, playing a crucial role in collaborating with all relevant parties to implement its duties in line with the National Strategic Plan on Combatting Money Laundering and Financing Terrorism and the Action Plan set by the Asia-Pacific Group on Money Laundering (APG). The ACU, as an active member in this matter, has participated in all the activities under the leadership of the National Bank of Cambodia, especially under the National Coordinating Committee Combating Money Laundering and Terrorism Financing and the Combatting of the Proliferation of Weapons of Mass Destruction Task Force. As the law enforcement authority, the ACU has: (1) develop and revised its internal legal framework and structures to combat money laundering and terrorism financing; (2) arranged for mechanism of the paralleled investigations; (3) revised the Standard Operating Procedures (SOP) to comply with FATF standards; (4) established an Anti-Money Laundering Bureau; and (5) continuously trained its officials on matters related to combating money laundering, especially financial investigations and recovering proceeds of crimes. As the head of the law enforcement team, the ACU has: (1) established an inter-ministerial technical working group to coordinate the implementation of laws for investigating money laundering offenses, having ACU as the head of this team (this team has met and operated well and will continue to coordinate the enforcement of laws involved with the investigation of cases of money laundering offenses to ensure that it shall be improved further from time to time; (2) assisted law-enforcement ministries and institutions to develop and enforce their SOPs; (3) developed and collaborated to organize numerous training sessions, workshops, and meetings related to combating money laundering and terrorism financing at both inter-institutional and international levels to enhance capacity, skills, and effectiveness in combating money laundering and terrorism financing in Cambodia; (4) coordinated and shared information as well as to closely collaborated with relevant ministries and institutions in Cambodia to improve the mechanism of anti-money laundering in Cambodia. The notable achievements made at the FATF General

Assembly was that Cambodia was officially removed from the grey list on February 24, 2023, without further requiring Cambodia to report on the progress of AML/CFT/PF work anymore. The APG group found that Cambodia has an improved working system and operational mechanisms and is ready for the implementation of AML/CFT/PF work to ensure sustainability, development, and further enhancement in the future. Currently, relevant ministries and institutions in Cambodia, including the ACU, continue to implement their mandates to protect Cambodia's financial system and economy through ongoing capacity-building training and investigating money laundering offenses, and so on. Furthermore, under the coordination of the FIU, Cambodia is conducting a national risk assessment against money laundering to identify sectors and risk offenses and setting out strategies to effectively address those issues. The ACU has also continued to train officials and conduct investigations and file the money-laundering cases to competent courts continuously.

- 3) **Global Network of Anti-Corruption Law Enforcement Authorities:** ACU joined the GlobE Network on 10 January 2024 and participated in the Network's first plenary meeting at the 5th Plenary Meeting on 24-27 September 2024 in Beijing, China. The GlobE Network is a network of law enforcement authorities that aims to provide international cooperation in the field of law enforcement and recovery of the proceeds of corruption.
- 4) **ASEAN-PAC:** In addition to participating in various activities as a member, ACU served as the rotating chairman for the 2022-2023 term and hosted the 18th ASEAN-PAC Leaders' Meeting on 22-23 November 2022 in Phnom Penh, where 3 of the most important ASEAN-PAC documents were approved and signed, including the ASEAN-PAC Memorandum of Understanding (ASEAN-PAC MoU), Terms of Reference (TOR), and the ASEAN-PAC 3-Year Action Plan 2023-2025. In addition, the ACU also initiated the preparation of the ASEAN-PAC E-Booklet, which was approved at the 19th ASEAN-PAC Leaders' Meeting in Laos and officially launched at the 20th ASEAN-PAC Leaders' Meeting in Indonesia. The following year, the ACU hosted the 19th ASEAN-PAC Secretariat Meeting on 16-17 August 2023 in Siem Reap.
- 5) **Trilateral cooperation (ACU Cambodia, SIA Laos, NACC Thailand):** ACU Hosted the 3rd Trilateral Working Group Meeting on Anti-Corruption Cooperation between the Anti-Corruption Unit of the Kingdom of Cambodia (ACU), the State Inspection Authority of Lao People's Democratic Republic (SIA) and the National Anti-Corruption Commission of the Kingdom of Thailand (NACC) held from 31 July to 1 August 2024. The meeting was organized under the theme "Education and Prevention of Corruption in Public Service Deliveries" with a focus on discussing and sharing strategies related to education and prevention of corruption, as well as to discuss all issues related to public service deliveries, strengthening communication and cooperation among officials working at the border, and other related work.
- 6) **Signing of a bilateral memorandum of understanding on cooperation:** Signed four Memoranda of Understanding on Cooperation with the National Anti-Corruption Commission (NACC) Thailand, the National Anti-Corruption Commission (ACC) Myanmar, the State Inspection Authority of Laos (SIA) and the National Inspection Commission (NSC) The People's Republic of China. This bilateral cooperation aims to promote and enhance cooperation in the fight against corruption through the exchange of official visits and the exchange of information, knowledge and experience on basis of equality, mutual respect and mutual benefit. In accordance with these bilateral memorandums of understanding, since

2020, ACU has received 5 official visits to the Kingdom of Cambodia and has made 3 official visits abroad.

- 7) **Other international cooperation:** In addition to the above international cooperation, ACU has consistently implemented and actively participated in forums and meetings organized by international organizations as a member, including: participating in ADB/OECD meetings, IAACA conferences/meetings, IACA meetings, and many other meetings, conferences, and workshops both within and outside the region on the international stage.

International cooperation activities (times)								
TYPE	2011-2015	2016-2020	2021	2022	2023	2024	2025 (Until June)	Total
ASEAN-PAC Meeting	10	10	2	2	2	2	1	29
UNCAC Meeting	15	11	1	2	2	3	2	36
ADB/OECD Meeting	5	5	1	-	1	1	-	13
IAACA Meeting	7	2	-	1	1	1	1	13
IACA Meeting	3	5	1	1	1	1	2	14
GlobE Network Meeting	-	-	-	-	-	1	1	2
Star-Interpol	5	1	1	-	-	-	-	7
Prepared for official Visit	3	4	-	-	2	3	2	14
Pay Official Visit abroad	3	3	-	-	1	2	-	9
Meetings, conferences, workshops and etc...	39	72	14	10	15	15	7	172
Total	90	113	20	16	25	29	16	309

In addition to the above mechanisms, ACU also conducted research and collected information from open sources and news articles. Of these, ACU produced 9,007 daily newsletters, which are national news from ministries, institutions and sub-national levels, 6,231 international news articles, and 2,776 news items.

National and international news statistics

N.o	Description	2011-2015	2016-2020	2021	2022	2023	2024	2025(June)	Total
1	National News by Ministries - Institutions	2,108	2,828	583	434	163	115	-	6,231
2	International news in other countries	451	465	409	330	708	878	-	2,776
Total		2,559	3,293	992	764	871	993		

2.4. Internal Governance (The Disciplinary and Internal Control Council)



In the cause of the success of strengthening cleanliness in public administration and fighting corruption in Cambodia the implementation of the good governance principles of ACU, based on the five approaches of leadership “self-reflection, showering, scrubbing, treatment and surgery” and the policy “Cleanliness must come from the home of each institution” are important prerequisites for achieving of the anti-corruption strategy put forward in the past three mandates. The Disciplinary and Internal Control Council of the ACU established in December 2014 and reorganized to 13 new members by 2023 in collaboration with the Internal Investigation Team, a strong staff responsible for strengthening discipline, integrity, internal unity and managing conflicts of interest for efficiency and effectiveness in the work of ACU by developing and disseminating relevant regulations on internal governance, promoting, strengthening and monitoring the implementation of those regulations correctly and rigorously.

All internal governance regulations that have been put in place are ensured to be disseminated to all officials and continuously raise awareness like rains through 1). Posting announcements through the internal communication system of the joint organization by department/working group 2). Orientation training for new officers that all newly hired officers must

undergo, and refresher courses organized annually 3). Weekly-monthly departmental meetings and other meetings of the ACU. The level of understanding of regulations is also surveyed by preparing a questionnaire for officials to fill out. Various mechanisms and measures are put in place to promote work efficiency and compliance with internal regulations, based on the principles of transparency and encouraging and disciplining personal conduct without bias. All ACU officers before joining the service must sign a contract, comply with internal regulations and rules and voluntarily take a polygraph test according to the organization's policies. All ACU leaders and officers must report (from assistant rank and up) and/or request permission to dine out and receive hospitality(Entertainment, accommodation, health services, education...) accepting gifts and conflicts of interest (related to bribery cases, participating in observation of bidding processes, framework exams, role exams, participating as a committee or in various working groups, etc.) to the President of ACU and the President of the Disciplinary and Internal Control Council by reporting and/or requesting permission. Decisions/actions are made transparently through ACU's internal communication system, with the National Anti-Corruption Council monitoring them and being properly recorded as a basis for monitoring and evaluation. The Disciplinary and Internal Control Council also participated in providing advice on the selection of contract officers, participated in reviewing the selection examinations for officers within the ACU reviewed and evaluated the results of promotions, ranks, awards, and roles in ACU as well as reviewed and resolved requests, cases of violations of regulations related to internal governance, cases of irregularities in the implementation of the roles and duties of civil servants of the ACU according to information received from the internal investigation team, the white mailbox in the ACU. Without exception, ACU also arrested, filed cases, and sent ACU's officials who committed corruption to court in two cases to strengthen internal cleanliness. Two cases of impersonating ACU's officials and aggravated fraud to extort money from victims were also brought to court.

Discipline and internal control work								
N.o	Description		2020	2021	2022	2023	2024	Total
1	Training on regulations related to internal governance (excluding other promotional meetings such as rain showers)		9	-	1	5	1	16
2	Announcements/Requests for Permissions	Request for outside meals (times)	47	-	139	64	48	298
		Receiving gifts and hospitality (times)	10	-	18	17	17	62
3	Internal encouragement and discipline	Officer Appointment evaluation meeting (in person)	0	3	74 (1 not approved)	4	8	89 (1not approved)

		Award ceremony evaluation meeting (in person)	34	43	87	160	88	412
		Meeting to evaluate promotion of rank and rank (in person)	203 (not promote 1)	147	257 (not promote 6)	150 (not promote 3)	235 (not promote 9)	992 (not promote 19)
4	Internal complaint and request handling review		6 (Dismissal 2)	1	4	3	6	20
5	File a case and send it to court	Corruption case of ACU's officials	-	-	1	-	1	2
		Serious case of impersonating ACU's officer and cheating	-	2	-	-	-	2

2.5. Monitoring and evaluation and unimplemented work

2.5.1. Monitoring and evaluation work

Based on the strategy, principles of good governance, and the Royal Government's ongoing reform policies, the working group monitors and evaluates the implementation of the national anti-corruption strategic plan (Monitoring and Evaluating Group-MEG). It was established with the leadership of the ACU and relevant departments and working groups to play an important role in this task and has the role and duties of supervising, monitoring, providing recommendations and evaluating the implementation of the anti-corruption strategic plan, studying, analyzing and synthesizing information, data, statistics and work performance reports contained in the national anti-corruption strategic plan.

This monitoring and evaluation system will help identify successes, good practices, challenges, and lessons learned to further improve the national anti-corruption strategic plan, both during the preparation and implementation stages.

The mechanism and methods of monitoring and evaluating the implementation of the national anti-corruption strategic plan are required by the MEG working group to prepare their anti-corruption work activity plans for implementation in accordance with the national anti-corruption strategic plan and to measure the effectiveness of their implementation and the results of their work as specified in the national anti-corruption strategic plan through their monthly, semi-annual, annual and 5-year performance reports, as well as submit semi-annual and annual reports to the Royal Government.

The results of monitoring and evaluating the implementation of the national Anti-Corruption Strategic Plan Phase 1 for a period of 5 years (2011-2015), which has 81 core activities/activities, and the Anti-Corruption Strategic Plan Phase 2 for a period of 5 years (2015-2020), which has 40 core activities and 70 activities, and the Anti-Corruption Strategic Plan Phase 3 for a period of 5 years (2020-2025), which has 43 core activities and 78 activities, yielded the following results:

Year	Core activity	Activity	Result %	Unplanned activities	Remaining %
2011- 2015	81	81	100	0	0
2015 (July-December)	37	57	78	0	0
2016	30	52	76	0	24
2017	36	68	79	32	21
2018	35	69	89.15	46	10.85
2019	40	70	94.04	32	5.96
2020	38	68	93.84	0	6.16
2021	37	76	88.11	4	11.89
2022	35	64	98.34	3	1.66
2023	35	60	99.84	2	0.16
2024	32	59	100	2	0
2025 (January-June)	30	57	100	2	0

In particular the results of monitoring and evaluating the implementation of the Anti-Corruption Strategic Plan Phase 3 (2020-2025) over the past 5 years, the department working group and related departments have decided to implement 97% of the planned plan, with only the remaining 3% to be included in the Strategic Plan Phase 4 (2025-2030) for further implementation. In addition, there are 2 unplanned plans and activities to be implemented as follows:

2020	2021	2022	2023	2024	2025 (Jan-Jun)	Total %	Unplanned activities
93.84	88.11	98.34	99.84	100	100	97	2

The evaluation of the implementation of the phase 3 of the anti-corruption work for the past 5 years (2020-2025) has achieved excellent results, achieving both the planned and a few unplanned. The above results reflect the high attention of the department, working groups and related departments who have worked hard to carry out their work with a sense of responsibility and high professionalism, especially in the work of education prevention obstruction and suppressing corruption crimes and the cooperation of authorities and ministries and institutions at all levels.

2.5.2. Unimplemented Work

The key achievements mentioned above were implemented in accordance with the Strategic Plan Phase 3 (2020-2025) which has 43 core activities and 78 activities according to the planned plan and with the guidance of the NCAC, achieving a total of 96%. Meanwhile, there are a small number of strategic plan activities—approximately 4% remaining—that have been partially implemented but are not yet fully completed. These must be continued by incorporating them into this 4th National Strategic Plan for Anti-Corruption (2025-2030). These activities include:

1. Expanding the scope of the anti-corruption Work
2. expand the scope of targets to declare assets and liabilities
3. Encouraging ministries, public institutions, and the private sector to have anti-corruption programs or action plans, work mechanisms to implement action plans, and mechanisms to monitor and evaluate the implementation of those action plans.
4. Establishing and implementing a system for classifying conflicts of interest and integrity in ministries, public institutions, and the private sector.

2.6. Successful Factors - Challenges -Lesson learned

2.6.1. Successful Factors

The success factors highlighted in the Strategic Plan Phase 3 (2020-2025) remain key to bringing about positive results in the fight against corruption. These factors include:

1. Policy and legal framework: from the rectangular strategy, anti-corruption laws to the management and operation of ACU with adequate financial resources, independence and without interference
2. Participation from all sectors: all areas, all sectors, all institutions (education, prevention, obstruction) at both national and international levels
3. Leadership and Management: Effectiveness in fulfilling the role of consultant and recommender to the N.C.A.C. as well as responsible and professional leadership by the ACU leadership.
4. National and international developments: from successive state reform programs to the anti-corruption movement, symbolized by UNCAC.
5. Strengthening political will from the Head of the Royal Government: To ensure good governance in leading and managing institutions in accordance with the 5 defined approaches" leadership "self-reflection, showering, scrubbing, treatment and surgery". The five principles have served as a compass to guide civil servants in fulfilling their roles and responsibilities and living ethically, professionally, and responsibly.
6. Better response to the state's anti-corruption policy by heads of public institutions: through continuous internal institutional reforms, as well as more effective cooperation with ACU, both in education, prevention, obstruction, and enforcement of suppression laws.
7. The human resources of the ACU have been strengthened and expanded: both in terms of quantity and quality of expertise. These success factors have also been complemented by a series of positive and favorable developments for the cause of anti-corruption, including:
 1. Strengthening cooperation between public institutions related to the ACU on specific work themes: joint efforts under the spirit of unity for the effectiveness of state reform work on certain tasks such as preventing and suppressing mining crimes, encroaching

on the flooded forests of Tonle Sap Lake, increasing state revenue collection, cost savings, justice and judicial reform work, and public administration reform, especially on examinations.

2. Pentagon Strategy Phase 1 2023-2028: With the setting of more ambitious policy programs by the Head of the Royal Government of the 7th mandate, multi-sectoral efforts have been strengthened, expanded and re-launched to respond to the goals set towards 2030 and 2050, as well as to overcome all challenges arising from the global economic crisis. The new momentum and strength, full of energy and enthusiasm, have promoted the work of reforming good governance, abandoning bad habits, adopting new habits and modernizing various works that have contributed to eliminating obstacles and solving various social problems, including the work of fighting corruption. The effectiveness of the new leaders has been supported by the previous leaders under the old slogan "Young people are strong, old people know the way" edited to "Young people are strong, know the way, and old people have experience."

2.6.2. Challenges

A few challenges highlighted in the Strategic Plan Phase 3 (2020-2025) continue to be obstacles to the fight against corruption. These challenges include:

1. Changing ideas, perspectives, and habits: Changing the ideas, perspectives, and habits of society takes time and participation.
2. Implementation and learning gradually, building strength and capacity gradually: the need for regular training and skill development and the slow pace of expanding the scope across the capital and provinces.
3. Legal framework, procedures, and related mechanisms: Implementation of recommendations received from the review has not yet responded to the needs, both on the protection of witnesses and reporting persons, confiscation of proceeds of crime, and the provision and receipt of mutual legal assistance, etc.
4. Anti-corruption work must be collaborative: The need for greater participation and collaboration from both the public and private sectors.
5. Inter-agency coordination: Although there has been much positive and smooth progress, there is a need to strengthen and further understand the common understanding between both public institutions and the judiciary, especially on new priorities such as anti-money laundering and confiscation of proceeds of crime, etc. Strong and coordinated efforts will help speed up and increase the effectiveness of the fight against corruption.
6. Expert resources: Expert work such as financial document analysis, computer forensics, and accounting remains limited, especially when dealing with complex and cross-border cases.
7. International Cooperation: Although ACU has some good experience in collaborating with foreign counterparts, this work remains a challenge that requires building additional knowledge, know-how, and expanding bilateral and multilateral relationships as much as possible.

In addition to the challenges noted above, past anti-corruption work has also faced problems such as:

1. The work is still new, urgent and busy: This can be said to be both a challenge and an opportunity, because it is new, urgent, and busy, requiring some walking and a lot of running, but also provides opportunities to expand and polish additional skills. However, facing such situations can also slow down and divert attention from other key tasks.
2. Rapid technological developments usher in the era of artificial intelligence (AI) for humanity: Technology and artificial intelligence (AI) can be both a challenge and an opportunity, requiring law enforcement authorities to accelerate their development, both

by equipping themselves with modern tools and adding new skills to keep up with the situation and the evolution of crime.

2.6.3 Lesson learned

The seven lessons learned highlighted in the Strategic Plan Phase 3 (2020-2025) remain relevant in combating corruption. These lessons include:

1. The Royal Government's national development policies and plans are a precursor: from political will to a roadmap oriented towards anti-corruption, put forward by the Royal Government.
2. State reforms have had a positive impact on anti-corruption work: These reforms have acted as a locomotive that has the power to pull and promote sectoral and ministerial-institutional reforms to bring about large-scale, sustainable and long-term results.
3. Participation is a necessary factor for success: The level and effectiveness of participation, both through mobilization and volunteerism, determines success in combating corruption.
4. Preventive measures: low cost but high profit.
5. Strengthening monitoring and evaluation systems: Necessary for measuring success, challenges, and extracting lessons and good experiences for future work.
6. Anti-corruption focal points play a key role in building clean institutions: The collaboration provided by anti-corruption focal points contributes to eliminating repeat offenses, closing opportunities for corruption, and creating an environment conducive to strengthening integrity in institutions. Anti-corruption focal points are a testament to the importance of uniting for a common cause.
7. Fulfilling international obligations leads to internal development: Cambodia's obligations under international instruments such as UNCAC and FATF have encouraged the establishment of legal frameworks and strengthened implementation by relevant actors, aiming to improve the fight against transnational crimes, including anti-corruption and money laundering, meet international requirements, and provide long-term benefits.

In addition to these lessons, other new lessons include:

1. Clear work, serving greater public interest, building trust and confidence. The efforts to lead and perform work responsibly, intelligently, and creatively by the ACU's leadership and colleagues as a general to the Royal Government in leading the implementation of the anti-corruption policy have brought trust from the heads of the Royal Government and relevant public institutions, the private sector, as well as the general public who have participated in promoting the work of building clean institutions, reforming good governance, and combating corruption.
2. The power of combining forces and the old and new experiences of inter-agency cooperation have brought about work efficiency, acceptable results, cost savings, increased revenue, also led to the prevention and suppression of crimes. Providing cooperation with ACU is like equipping public institutions with specialized skills that cannot do anything beyond the legal framework (short arm), for example in issuing licenses, while the ACU has stronger capabilities in investigations, intelligence gathering (long arm) to achieve the common goals set by the state.

The best role of ACU is as a supporting role. ACU has supported the efforts to implement new measures put forward by various ministries and institutions in line with the policies of the Royal Government and together have brought about many positive achievements that are worthy of pride.

3. Analysis of the Surrounding Environment

3.1 Political, Economic, Social, Technological, Legal, and Environmental Analysis (PESTLE)

3.1.1 Political Analysis

The Pentagon Strategy Phase I (2023-2028) is not only a continuation of the commitment to support anti-corruption efforts initiated by the previous government but also an effort to sharpen and expand strategic goals. It introduces more comprehensive and comprehensible measures aimed at the shared objective of developing a modern, prosperous nation. With the ambition of advancing the country's status to a high-middle-income country by 2030 and a high-income country by 2050, reform programs across all sectors—led by energetic and dedicated operators—are being implemented with renewed vigor. Driven by strong political will, these efforts are generating a sense of hope and optimism among the people and society at large.

Subsequent reminders and practical actions reflect the strong commitment of the Head of the Royal Government to implement the strategies and policies outlined, based on the five-pronged approaches: **"Reflecting oneself in mirror, taking bath, rubbing off dirt, taking treatment, and undergoing operation"**. These principles have been embraced by public officials and align with the model of **"A Whole of Society Approach"**, which emphasizes institutional development, the strengthening of good governance, and the improvement of public sector efficiency by enhancing the quality, effectiveness, and performance of officials and institutions. Furthermore, the Royal Government has promoted the strengthening of mechanisms for monitoring and evaluating the implementation of policies and programs. These efforts aim to make the process more scientific and sophisticated in order to enhance efficiency and effectively address emerging challenges and obstacles.

In areas such as public finance, public administration, justice and the judiciary, decentralization, and land de-concentration, many reform efforts are being actively and vigorously implemented. Continuing these tireless reforms will enhance governance, increase transparency, and contribute significantly to the fight against corruption.

Ministries and institutions have consistently supported educational efforts to raise awareness about the impacts of corruption, prevent corrupt practices by improving work implementation, and cooperate closely with the Anti-Corruption Unit. They have also taken steps to enforce disciplinary actions against misconduct by subordinates, in accordance with subsequent guidance and recommendations.

Within regional and international frameworks, the Royal Government has actively supported and encouraged anti-corruption institutions to participate in anti-corruption mechanisms with partner countries. This includes exchanging experiences, providing mutual assistance, and fulfilling Cambodia's obligations as a member of joint anti-corruption mechanisms such as ASEANPAC, UNCAC, and APG. The achievements of these mechanisms are regularly shared with the public, and actions requiring the participation of various stakeholders—such as public institutions, the private sector, and civil society—are encouraged. These stakeholders are also invited to provide input through mechanisms such as UNCAC.

In terms of operations and implementation, the Anti-Corruption Institution is granted full independence to carry out its duties and responsibilities, along with the full support of the Royal Government in terms of budget and human resources.

3.1.2 Economic Analysis

The Cambodian economy has been positively assessed by many international institutions. Despite the impact of the COVID-19 crisis and the global economic downturn, it remains stable and has achieved a growth rate of approximately 7%, returning to the level seen before the pandemic. This strength and resilience reflect the quality and leadership capacity of the Royal Government.

The Royal Government continues its efforts to promote economic growth, expand infrastructure, build and develop the nation, reduce poverty, attract both national and international investment, and increase the salaries of civil servants. It also ensures inclusive policies and programs that consider all segments of society, reaffirming its commitment to improving the lives and livelihoods of the Cambodian people and leading the country toward greater diversity and prosperity.

The Royal Government has also advanced economic policy by increasing the contribution of the private sector to economic development through the implementation of mobilization and incentive measures that support both existing and new investments, both domestically and internationally. Efforts to promote investment, through the introduction and provision of attractive and competitive incentives, are led and directly implemented by the head of the Royal Government. These efforts have resulted in continuous investment, which should be regarded as a proud achievement for the nation's labor force.

At the same time, public finance reforms, revenue-boosting mechanisms, and cost reduction/increased savings are confidently advancing, with the introduction of tools that facilitate this work. These include the implementation of public procurement laws, a commitment to promote e-procurement, and the continued execution of public financial reform programs. From Phase 1, which focuses on building budget credibility, to Phase 2, which emphasizes financial accountability, Phase 3, which links budgets to policies, and Phase 4, which focuses on building accountability for performance, these reforms are progressing steadily.

However, the instability and deterioration of the global economy, the escalating trade war between superpowers and major countries, and the intensifying competition from all directions will continue to require the government to be more vigilant, strategic, flexible, and proactive. It must stay attuned to the situation, seize opportunities, and continue reforming regularly.

3.1.3 Social Analysis

Over the past fifteen years, anti-corruption education campaigns have focused on raising awareness of the Royal Government's anti-corruption policy, the consequences of corruption, and the importance of individual participation in the fight against corruption. These efforts must begin with each member of society and the development of clean institutions, aiming to build a transparent and ethical society. The campaigns have extended across public institutions, the private sector, and public schools, both directly and indirectly, through traditional methods and modern platforms such as social media.

The Anti-Corruption Unit believes that Cambodian society has gained a deeper understanding of corruption and its impacts. This growing awareness is demonstrated by increased cooperation from government institutions, local authorities, parents, and the general public, especially in public forums and in the reform of key government processes, such as the Higher Secondary Education Examinations and the Civil Service Recruitment Competition.

National Anti-Corruption Day is celebrated every year on December 9, with widespread participation from the public and various stakeholders. During this event, messages of support and encouragement are shared by the leaders of the National Council for Anti-Corruption, the National Committee for Combating Corruption, and other related organizations.

Public involvement is also evident in the increasing number of people providing information about corruption and filing complaints—both anonymously and with disclosed identities—to the Anti-Corruption Unit. This reflects a growing intolerance for corruption within society.

Nevertheless, while enforcement of the law and prosecution of corruption remain essential, educational efforts must continue to be expanded both in and out of schools. These programs should particularly target young people, those about to enter the workforce, and individuals already working in state and non-state institutions. A broad and inclusive approach is needed to embed anti-corruption values deeply within society and ensure a clear, lasting impact on future generations.

3.1.4 Technological Analysis

In the information age, technology has provided significant benefits across all sectors and for all stakeholders, including individuals, the government, and the private sector. The Seventh Mandate of the Royal Government has stated that digital technology in leadership and management is both the future and a necessity for the state. Several upcoming changes, particularly in governance, finance, justice, public services, and law enforcement, will prioritize the integration of technology into operations and the implementation of roles and duties. This goal will serve and support the efforts to combat corruption.

In fact, technology will continue to play a crucial role in education, awareness-raising, prevention, and enforcement of anti-corruption laws. This includes promoting legal awareness, closing opportunities for corruption, investigation, information collection, reporting, protecting sources, filing and resolving complaints, and building cases for the courts. Technology has contributed to increasing efficiency, trust, speed, ease, and timeliness in these processes.

However, technology is also used by criminals as a tool for committing crimes, which increases complexity and challenges in combating and preventing such activities. The provision of advanced technological tools and the enhancement of management capabilities to maximize the benefits of available technology are essential in the information age, where rapid, unpredictable advancements in new technologies, such as artificial intelligence (AI), are taking place.

3.1.5 Legal Analysis

Under the initiation of the government, several laws have been adopted to establish necessary legal standards for governance and leadership, as well as the development of modern society. These include laws on anti-corruption, criminal procedures, mutual legal assistance (MLA) in criminal matters, anti-money laundering (AML), and other laws passed by the legislative bodies. Among these, laws aimed at fighting corruption are often adjusted by the government to seek reforms and modifications to ensure the independent enforcement of anti-corruption laws. Furthermore, as part of its obligations as a UNCAC State Party and an APG member, Cambodia has undergone assessments on the implementation of UNCAC and has worked on addressing recommendations made by the FATF. Some important aspects highlighted and encouraged include laws related to public officials' conduct, witness protection, the protection of whistleblowers, the prevention of conflicts of interest, expanded provision of information and reporting on anti-corruption work, and support for mutual legal assistance in fighting money laundering and other

crimes. Efforts to adopt new laws must be based on the innovation and development context of the country, in line with the specific circumstances and possibilities for effective implementation.

3.1.6 Environmental Analysis

The Sustainable Development Goals (SDGs), adopted by the UN General Assembly in 2015, have been integrated and driven forward by the government. Goal 16, which concerns anti-corruption efforts, such as reducing bribery, enhancing institutional transparency, and fighting the consequences of criminal activities, has been prioritized in the government's policy and leadership programs. Additionally, efforts from the international and regional community, such as the UNGASS resolution on anti-corruption, the 2021 cooperation agreements with ASEAN Anti-Corruption agencies, and continued support for good governance, have all contributed to building a society with positive impacts on development and increased trust, cooperation, and engagement from all stakeholders towards a clean society.

3.2 Strengths, Weaknesses, Opportunities, Threats Analysis (SWOT)

3.2.1 Strengths

- Having the political will, policy and national strategic development plan as a driving force for supporting and paving the way
- Having relevant laws and regulations to ensure the independency, adequate human resources and budget for its operation and fulfilling its roles and duties of ACI.
- Having NCAC in conducting strategic plan, giving advices and recommendations.
- ACU has action plans and management structures for implementation, including education, prevention, and law enforcement.
- Having the monitoring and evaluation mechanism to promote and ensure the implementation of action plans and enhances work efficiency.
- Having regulations and internal control mechanism to ensure integrity, moral value, transparency and accountability and avoid conflict of interests.
- Having capacity building and professional development continuously.
- Having strong public confidence from ministries-institutions, private sector and general public
- Having effective regional and international cooperation.

3.2.2 Weaknesses

- Resources and professional skills still need to be expanded and strengthened to adapt to changing social and economic conditions.
- Education, prevention and obstruction within the public, private sector and the communities is still limited.
- Municipal-provincial anti-corruption offices is currently not available
- Collaboration with ministries and institutions on prevention and obstruction work is still limited.
- The public service delivery system has not yet become a fully automated system.

3.2.3 Opportunities

- Having the political will and legal framework with sufficient qualified human resources and budget on anti-corruption activities.
- Working to improve governance is set as the priority within the political program and is the core focus of reforms under Pentagonal Strategy of the royal government.

- The in-depth reform programs are being implemented in all public institutions.
- The participation and support from all stakeholders including the public and private sectors, civil society organizations, individuals and the public.
- The national and international movement on anti-corruption work is becoming more and more focused and prioritized.
- National and international mechanisms for anti-corruption work have gained greater momentum and strength.

3.2.4 Threats

- The change of mindsets, concepts, and habits take more times.
- Good governance, integrity, and ethics at public and private institutions are still limited
- Education, prevention and obstruction measures by public and private institutions have not been thoroughly and broadly implemented yet.
- Understanding of the effects of corruption remains limited.
- The consciousness of the relevant persons to maintain cleanliness is not yet strong.

4. Strategic Goals (2025-2030)

4.1 Vision

To become a society free from corruption adhering to integrity and rule of law where all citizens at all levels have been well aware of the impacts of corruption.

4.2 Mission

To promote integrity in fighting against corruption by all means, in all sectors, and at all levels in Cambodia through the education, prevention and obstruction, and law enforcement with participation from public and international cooperation.

4.3 Policy

Anti-corruption policy is to strengthen good governance by eliminating corruption in all forms, in all sectors and at all levels with zero tolerance aiming to achieve socio-economic development in sustainable, equitable and stable manner.

4.4 Value

The values of anti-corruption are integrity, transparency, independence, professionalism, fidelity, courage, solidarity, team spirit, creativity, accountability and responsibility.

4.5 Objective

Anti-Corruption Institution promotes the awareness of the public together with the law enforcement to crackdown the corrupt offenders aiming to reduce corruption both the offenses and opportunities to corrupt with remarkable results. The results achieved shall help to strengthen good governance, rule of law that contribute to the formation of a clean society and justice. Furthermore, this also helps to improve the livelihood of the citizens as well as to accelerate the socio-economic development.

4.6 Priority Strategic Works and Stakeholders

Key activities within the seven defined strategies will be highlighted: (1) Education, (2) Prevention and Obstruction, (3) Law enforcement, (4) Legal and policy frameworks, (5) International cooperation and fighting the effects of crime, and (6) Strengthening the capacity and integrity of

public institutions with regular monitoring and evaluation (7). Strategy for Capacity Development and Information Security in Countering Corruption Offenses via AI. These activities will be aligned with specific, clear objectives and will be implemented through a five-year action plan (2025-2030). Monitoring and evaluation mechanisms will ensure effectiveness and address emerging challenges in real-time.

Below are key priority tasks and essential focuses of the National Anti-Corruption Strategy Phase IV (2025–2030):

1. Expanding the scope of educational objectives, enhancing knowledge and mechanisms for integrity, transparency, and anti-corruption for higher education students, vocational training institutes, young officials at both national and sub-national levels, and non-state sector employees through direct training, ongoing instruction by certified independent trainers, and the anti-corruption focal point mechanisms within ministries and institutions
2. Expanding the scope of educational objectives, enhancing knowledge and mechanisms for integrity, transparency, and anti-corruption (e.g., public procurement, complaint handling, whistleblowers and witness protection, and risk assessments for licensing services, etc.) in formats that can be disseminated both traditionally and modernly (digitally)
3. Supporting the "Excellence in Public Service, People's Trust and Support" Movement and promoting modernization and streamlining public service delivery to ensure it is easier, faster, and simpler.
4. Supporting the enhancement of integrity frameworks in public procurement and riving the enforcement of procurement laws to reduce costs, increase efficiency, and transition toward a comprehensive e-Procurement system.
5. Broadening the scope of mandatory asset and liability declarations to include target groups highly vulnerable to corruption risks.
6. Supporting the modernization of competitive recruitment exams through a hybrid of digital and in-person methodologies
7. Expanding complaint-receiving mechanisms and channels (at the capital-provincial level) while expediting resolution, response, and follow-up tracking.
8. Developing and modernizing material resources, specialized equipment, and capacity for the investigation, tracing, and seizure of proceeds of crime, as well as the forwarding of cases to court.
9. Supporting the development of a Code of Conduct for public officials, including key components such as the prevention of conflicts of interest; mechanisms for complaint handling and resolution; the protection of whistleblowers and witnesses; and reporting on and accessing information regarding integrity building.
10. Developing legal instruments to strengthen the roles and responsibilities of Anti-Corruption Focal Point groups.

11. Supporting the formulation and issuance of legal instruments governing Mutual Legal Assistance, Anti-Money Laundering, and the recovery of proceeds of crime.
12. Supporting and promoting the execution of roles and responsibilities of Anti-Corruption Focal Points (encompassing education, prevention, training, procurement oversight, implementation of the 5-Approach principle, monitoring and evaluation, and reporting)
13. Facilitating and hosting strategic dialogues and consultations with key stakeholders, including the 10th Commissions of the National Assembly and the Senate; the Ministry of Economy and Finance; the Ministry of Civil Service; the Ministry of Interior; the Ministry of Justice; private sector law enforcement partners (including the renewal of Memorandums of Understanding); civil society organizations; academic institutions; and the media.
14. Expanding international cooperation through participation in regional and global anti-corruption mechanisms, the signing of MOUs on cooperation, and promoting more active participation within international forums such as UNCAC, OECD, the GlobE Network, and the APG.
15. Strengthening mechanisms and innovation platforms by developing creative solutions that align with the operational needs of anti-corruption bodies and the established policies of the Royal Government.
16. Studying international mechanisms- providing recommendations to create a good evaluation for Cambodia.
17. Strengthening the monitoring and evaluation (M&E) mechanisms for the implementation of the National Anti-Corruption Strategy to be more modern and scientific.
18. To organize and establish Anti-Corruption Office structures in the capital and provinces to handle anti-corruption tasks at the sub-national level focusing on education, prevention, and obstruction (not case preparation for court submission).
19. To organize Artificial Intelligence (AI) tasks for anti-corruption work.

5. STRATEGY, CORE ACTIVITIES, GOALS, AND WORK PERFORMANCE INDICATORS

Core Activities	Activities	Indicators	Responsibilities
I. EDUCATION STRATEGIES			
Objective 1: Expanding the Scope and Raising Awareness on Anti-Corruption			
1. To promote activities and increase the effectiveness of anti-corruption education in educational and vocational training institutions	1.1 To develop anti-corruption lessons and incorporate them into the curriculum for educational institutions, teacher training institutions, vocational schools, and vocational training institutions.	1.1.1 Number of anti-corruption modules for higher education, professional academies, and vocational training establishments. 1.1.2 Number of higher educations, professional academies, and vocational training establishments applied anti-corruption modules.	ACU - relevant ministries and institutions -parents - tertiary education- professional academies - higher education - vocational training establishments
	1.2 To organize anti-corruption educational initiatives across public and private educational institutions, teacher training centers, vocational schools, higher education institutions, and vocational training facilities.	1.2.1 The number of anti-corruption educational activities across public and private educational institutions, teacher training centers, vocational schools, and vocational training facilities. 1.2.2 Number of participants.	ACU - relevant ministries and institutions -parents - tertiary education- professional academies - higher education - vocational training establishments
	1.3 To train core trainers on anti-corruption lessons for higher education institutions, vocational schools, and vocational training institutions.	1.3.1 Number of core trainers trained.	ACU - relevant ministries and institutions

Core Activities	Activities	Indicators	Responsibilities
	1.4 To conduct field observations to gain experience and provide support for teaching and learning at target institutions.	1.4.1. Number of target institutions monitored. 1.4.2. Number of teachers who received training and participated.	ACU - relevant ministries and institutions -parents - tertiary education- professional academies - higher education - vocational training establishments
2. To promote anti-corruption in non-formal education (General public)	2.1. To organize educational activities on anti-corruption at specific targets	2.1.1. Modules on anti-corruption education is introduce to specific targets. 2.1.2. Number of disseminations 2.1.3. Number of participants.	ACU - relevant stakeholders
	2.2. To Celebrate National Anti-Corruption Day on 9 December	2.2.1. The celebration of National Anti-Corruption Day 2.2.2. Number of stakeholders participated.	ACU - relevant stakeholders
3. To promote anti-corruption in public institutions	3.1. To organize training courses/lectures on anti-corruption laws for public institutions	3.1.1. Number of training courses/lectures 3.1.2. Number of participants.	ACU – public institutions
	3.2. To organize lessons related to building cleanliness by theme for public institutions	3.2.1. Modules on building cleanliness	ACU- public institutions - anti-corruption focal points in Ministry - Institution

Core Activities	Activities	Indicators	Responsibilities
	3.3. To organize and launch a cleanliness training mechanism for public institutions	3.3.1. Mechanism for training on cleanliness in public institutions 3.3.2. Number of training programs 3.3.3. Number of ministries and institutions 3.3.4. Number of participants	ACU- public institutions - anti-corruption focal points in Ministry - Institution
	3.4. To organize the training of trainers' course (for further training)	3.4.1. Number of training sessions 3.4.2. Number of trainers trained	ACU- public institutions - anti-corruption focal points in Ministry - Institution
4. To Promote anti-corruption education activities in the private sector	4.1. To collaborate disseminating good anti-corruption programs of private partners to the general private sector	4.1.1. a). Number of disseminations b). Number of private sector/ participants	ACU- private sector
Objective 2: Promoting Participation in Anti-Corruption			
1.To strengthen public relation on anti corruption	1.1. To organize programs that collaborate with stakeholders to disseminate the anti-corruption program.	1.1.1. Number of collaborative activities with stakeholders to disseminate on anti-corruption.	ACU - Stakeholders
	1.2. To launch program understanding anti corruption work	1.1.2. Study program to understand anti-corruption work 1.1.3. Number of participants	ACU - Stakeholders
2. To establish a competition program related to education-training on cleanliness	2.1. To launch a research essay competition program related to good practices in fighting corruption	2.1.1. Have a research essay competition program related to good practices in combating corruption 2.1.2. Number of participants/winners	ACU - Stakeholders

Core Activities	Activities	Indicators	Responsibilities
	2.2. To launch a competition for the production of educational and training tools for cleanliness (video clips, art in various forms)	2.2.1. a competition for video clips related to good practices in fighting corruption 2.2.2. Number of participants/winners	ACU - Stakeholders
	2.3. To launch a poetry competition related to good practices in fighting corruption	2.3.1. The poetry competition related to good practices in combating corruption 2.3.2. Number of participants/winners	ACU - Stakeholders
3. Survey/Assessment of Awareness/Effects of Education on Corruption	3.1.To conduct a survey/assessment of awareness/effect of education on corruption	3.1.1 The results of the survey/assessment	ACU
Objective 3: Expanding the scope and strengthening the dissemination of the fight against corruption			
1. To expand the scope of anti-corruption dissemination	1.1. To develop anti-corruption education and dissemination tools	1.1.1. Number of anti-corruption education and dissemination tools produced	ACU
	1.2. To modernize a mechanism for disseminating educational and publicity tools on anti-corruption	1.2.1. The mechanism for disseminating educational and publicity tools on anti-corruption in a modern way	ACU
II. STRATEGY ON PREVENTION AND OBSTRUCTION			
Objective 1: Strengthening good governance and clean public administration			
1. To promote the organization of cleanliness strengthening programs in public	1.1 To launch a program strengthening cleanliness in public institutions (refer to the Code of Conduct, Reporting, etc.)	1.1.1. The program to strengthen cleanliness in public institutions,	ACU, Ministry of Civil Service, the anti-corruption focal points in ministry - institution

Core Activities	Activities	Indicators	Responsibilities
institutions (refer to the Code of Conduct, Reporting, etc.)	1.2. To provide support and monitor the implementation of cleanliness enhancement programs in public institutions	1.2.1. Number of ministries and institutions that have implemented cleanliness enhancement programs in public institutions	ACU, Ministry of Civil Service, the anti-corruption focal points in ministry - institution
Objective 2: Promoting good public service delivery			
1. To promote good public service delivery in public institutions	1.1. To promote the issuance and improvement of proclamations related to public service delivery	1.1.1. Number of inter-ministerial proclamations on public service delivery that have been issued and revised	ACU, public institutions/public service locations
	1.2. To Promote the modernization of public services	1.2.1. Public service delivery has been modernized	ACU, public institutions/public service locations
	1.3. Collaborate to streamline procedures, mechanisms, and systems in providing public services	1.3.1. Number of collaborations to streamline procedures, mechanisms, and systems in providing public services	ACU, public institutions/public service locations
Objective 3: Promoting clean business in the private sector			
1. To promote clean business	1.1. To expand anti-corruption cooperation with the private sector (MoU)	1.1.1. Number of MoUs and cooperation measures in various forms	ACU, private sector
	1.2. To organize dialogues/consultations, listen and address business challenges	1.2.1. Number of dialogues/consultations 1.2.2. Number of companies/private sector involved	ACU, private sector

Core Activities	Activities	Indicators	Responsibilities
Objective 4: Enhancing the effectiveness of preventing incidents in examinations, public procurement, and public sales			
1. To promote the implementation of the principles of compliance, transparency and fairness of examinations	1.1. To promote the modernization of examinations	1.1.1. Number of examinations organized in a modern manner	ACU - Stakeholders
	1.2. Modernization of observation work	1.2.1. Number of participants in observing modernized examination	ACU - Stakeholders
2. To enhance transparency, competition, fairness and savings in public procurement	2.1. To promote participation in preventing incidents in public procurement	2.1.1. Number of observing 2.1.2. Number of projects participated 2.1.3. Number of procurement institutions observed	ACU Ministry of Economy and Finance-Procurement Unit
	2.2. To prepare a list of bidders with irregularities (Red Flag) for MEF	2.2.1. Number of times the list sent to MEF 2.2.2. Number of companies/bidders	ACU
	2.3. To update the procurement observation management database	2.3.1. Number of updates of the procurement observation management database	ACU
	2.4. To promote the preparation and implementation of electronic procurement	2.4.1. Number of institutions implementing electronic procurement 2.4.2. Number of procurement projects implementing electronic procurement	Ministry of Economy and Finance-Stakeholders
	2.5. To prepare a mechanism receiving and resolving complaints related to corruption in public procurement	2.5.1. The mechanism to receive and resolve procurement complaints in ministries and institutions implementing procurement MOF	ACU- Ministry of Economy-Finance-Stakeholders

Core Activities	Activities	Indicators	Responsibilities
		2.5.2. Expert working group to resolve complaints related to corruption in the procurement sector	
3. To enhance transparency in public sales	3.1. To promote participation in preventing incidents in public sales electronic procurement	3.1.1. Number of observing 3.1.2. Number of projects participated 3.1.3. Number of institutions implementing public sales that participated in observation	ACU-competent institution-Stakeholders
	3.2. To compile information of buyers/companies with irregularities for submission to competent institutions	3.2.1. Number of submitting information to competent institutions 3.2.2. Number of companies	
	3.3. To promote the preparation and implementation of electronic public sales	3.3.1. Number of institutions implementing 3.3.2. Number of projects implementing electronic procurement	Ministry of Economy and Finance-Stakeholders
	3.4. To update the public sales observation management database	3.4.1. Number of updates to the observation management database	ACU
Objective 5: Enhancing the effectiveness of asset and liabilities declaration			
1. To expand the scope of assets and liabilities declaration targets	1.1. Identify new assets and liabilities declaration targets.	1.1.1 Numbers of expanded targets declared.	ACU
	1.2 To prepare the implementation of declaration	1.2.1 New mechanisms and goals for assets and liabilities declaration	ACU

Core Activities	Activities	Indicators	Responsibilities
	mechanism for new targets		
2. To Keep modernizing declaration of assets and liabilities	2.1 To organize the management of statistics, data, and archive files at its technical norms	2.1.1 Have statistics, data and the archive files shall be improved.	ACU
III. STRATEGY ON LAW ENFORCEMENT			
Objective 1: Strengthening the mechanism for receiving and resolving complaints			
1. Expanding and improving the scope of complaint reception	1.1. To expand the means and scope of complaint reception	1.1.1. The number of white boxes/postal boxes has been increased 1.1.2. The number of complaint reception methods has been increased 1.1.3. The number of locations has be increased	ACU
	1.2. To improve the effectiveness of complaint reception	1.2.1. The time for receiving and collecting complaints has be improved	ACU
2. Improve the effectiveness of complaint handling mechanisms	2.1. To improve the procedure for handling complaints	2.1.1. The registration period has been improved 2.1.2. The time for studying and collecting preliminary information has been improved 2.1.3. The time for submitting complaints to the complaint analysis meeting has been accelerated 2.1.4. The time for responding from ACU has been accelerated 2.1.5. The time for issuing clarification letters has been accelerated	ACU

Core Activities	Activities	Indicators	Responsibilities
		2.1.6. The time for issuing transfer of jurisdiction letters has been accelerated	
	2.2. To modernize the complaint handling mechanism	2.2.1 The complaint data management system has been modernized 2.2.2 The response tracking system of ACU has been modernized 2.2.3 The system for tracking the issuance of clarification letters has been modernized 2.2.4 The system for tracking the issuance of transfer of jurisdiction letters has been modernized 2.2.5 There are means/techniques for collecting information	
Objective 2: Strengthening the effectiveness of information collection			
1. To strengthen information collection networks and mechanisms	1.1. To Build and expand information collection networks	1.1.1. Information collection networks are expanded 1.1.2. Number of data connection with public institutions	ACU
	1.2. To strengthen information collection management	1.2.1. Number of training for information collectors	ACU
	1.3. To strengthen the collection of open sources and build summary report that serves investigations	1.3.1. Statistics of open sources collected.	ACU

Core Activities	Activities	Indicators	Responsibilities
2. To strengthen investigative capacity, maintain professional confidentiality	2.1. To promote the implementation of the investigative instruction manual (SOP) and maintain professional confidentiality of the Anti-Corruption Unit	2.1.1. Implementation of the investigative instruction manual (SOP) has been disseminated 2.1.2. The professional confidentiality instruction manual has been issued	ACU
3. To strengthen the effectiveness of investigation	3.1. To strengthen the capacity of investigation	3.1.1. Number of investigation skills training courses 3.1.2. Number of officials participated in investigative skills training courses	
	3.2. To develop guidance documents on maintaining professional confidentiality	3.2.1. Guidance documents on maintaining professional confidentiality has been issued	ACU
Objective 3: Strengthening professional capacity, technical, and forensic skills to serve law enforcement.			
1. To Build the professional capacity technical and forensic skills	1.1. Training in all types of forensic skills	1.1.1. Forensic skills development programs. 1.1.2. Forensic skills trainings	ACU
	1.2. Training on general protection skills including witness and reporting persons.	1.2.1. Standard Operating Procedures (SOP) for protection of witness and reporting persons. 1.2.2. Numbers of witnesses and reporting persons protected. 1.2.3. Numbers of trained officials.	ACU
	1.3. Training in surveillance skills	1.3.1. Surveillance skill development programs. 1.3.2. Numbers of trained officials.	ACU

Core Activities	Activities	Indicators	Responsibilities
Objective 4: Promoting case building, monitoring of accusations and sentencing			
1. To support capacity building of law enforcement officers, prosecution bodies and courts	1.1. To strengthen the capacity of law enforcement officers in case building	1.1.1. Number of training courses related to case building 1.1.2. Number of officers who have received enhanced capacity in case building	ACU
	1.2. To strengthen monitoring of the actions of the prosecution bodies and courts in the work of accusation, sentence and participate in the procedures in all levels of courts and compile case files.	1.2.1. Number of cases sent to court by ACU 1.2.2. Number of individuals accused and sentenced 1.2.3. Number of hearing applications received 1.2.4. Number of administrative letters sent in relation to cases sent to courts by ACU 1.2.5. Number of documents retained in relation to ACU cases 1.2.6. Number of hearings attended	ACU-Courts
IV. STRATEGY ON POLICY, LAW AND REGULATION			
Objective 1: Strengthening Legal, Policy, Legislation Framework			
1. To strengthen the preparation and compilation of legal documents	1.1. To participate in providing inputs on the preparation of legal documents	1.1.1. Number of meetings attended	ACU- Relevant ministry and institutions
	1.2. To prepare and compile legal documents	1.2.1. Number of legal documents prepared and compiled	ACU

Core Activities	Activities	Indicators	Responsibilities
2. To promote the implementation of recommendations from two review cycles of UNCAC in Cambodia (action plan)	2.1 To organize and implement action plan of recommendations implementation (stakeholders, time-frame, expected outcomes).	2.1.1. Have an action plan to implement recommendations 2.1.2. Have a report on the progress of implementing recommendations	ACU- Relevant institution
3. To promote the implementation of recommendations related to anti-money laundering (APG ...)	3. To organize and implement action plan of recommendations implementation (stakeholders, time-frame, expected outcomes).	3.1.1. Have an action plan to implement recommendations 3.1.2. Have a report on the progress of implementing recommendations	ACU- Relevant institution
4. To promote better coordination of the recovery of proceeds of crime	4.1. To prepare/revise the legal framework for the recovery of proceeds of crime	4.1.1. Number of legal documents prepared/improved	Ministry of Justice- ACU- Relevant ministries and institutions
	4.2. To prepare/revise the institutional framework for the recovery of proceeds of crime	4.2.1. Institutions/departments in charge of recovering proceeds of crime	ACU-Relevant ministries and institutions
	4.3. To promote regional and international cooperation to facilitate the recovery of proceeds of crime	4.3.1. Number of regional and international cooperation to facilitate the recovery of proceeds of crime	ACU - Ministry of Justice- Relevant institutions
5. To enhance the understanding of legal, policies, and legislation related to anti-corruption and money laundering	5.1. To disseminate and train on legal, policies and legislation for Anti-Corruption Institution, law enforcement authorities and courts.	5.1.1. Number of officials receiving training on legal, policies and legislation	ACU - Law enforcement authorities - Court

Core Activities	Activities	Indicators	Responsibilities
Objective 2: Developing and adopting laws and regulations in complies with international obligations			
1. To review on possibility of the amendment or developing new laws or legal documents to promote anti-corruption	1.1. To establish measurements and internal mechanisms for implementation and coordination on mutual legal assistances and the recovery of proceeds of crime	1.1.1 Measurements and internal mechanisms and for implementation and coordination on mutual legal assistances and the recovery of proceeds of crime	Ministry of Justice - ACU
2. To develop code of conducts for public officials	2.1. To organize and introduce the codes of conducts for public officials.	2.1.1. code of conduct for public officials 2.1.2. mechanism to implement the code of conduct 2.1.3. Report summarizing the results of implementing the code of conduct by ministry-public institution	Ministry of Civil Service
V. STRATEGY ON NATIONAL-INTERNATIONAL COOPERATION AND THE RECOVERY OF PROCEEDS OF CRIME			
Objective 1: Strengthening Partnership On Anti-Corruption Works At National Framework			
1. To strengthen cooperation with the National Assembly and Senate	1.1 To conduct dialogues/consultations on anti-corruption	1.1.1. Number of dialogues/consultations	ACU-National Assembly-Senate
2. To strengthen cooperation between Anti-Corruption Unit and Ministry of Economy and Finance	2.1. To conduct dialogues/consultations to tackle challenges together.	2.1.1. Number of dialogues/consultations	ACU- Ministry of Economy and Finance

Core Activities	Activities	Indicators	Responsibilities
3. To strengthen cooperation between Anti-Corruption Unit and Ministry of Interior	3.1. To conduct dialogues/consultations to tackle challenges together.	3.1.1. Number of challenges resolved	ACU- Ministry of Interior
4. To strengthen cooperation between Anti-Corruption Unit and Ministry of Justice	4.1. Conduct dialogues/consultations to tackle challenges together.	4.1.1. Number of challenges resolved	ACU- Ministry of Justice
5. To strengthen cooperation between Anti-Corruption Unit and Ministry of Civil Service	5.1. To conduct dialogues/consultations to tackle challenges together.	5.1.1. Number of dialogues/consultations	ACU- Ministry of Civil Service
6. To strengthen cooperation between Anti-Corruption Unit and law enforcement agencies and related institutions	6.1 To conduct dialogues/consultations to tackle the challenges and share experiences between stakeholders.	6.1.1. Number of dialogues 6.1.2. Number of participating institutions	ACU- Law enforcement authorities
7. To Strengthen collaboration between anti-corruption unit and private sector, academia, media, and civil society that support anti-corruption work.	7.1. To organize dialogues/consultations on anti-corruption work	7.1.1. Number of dialogues/consultations 7.1.2. Number of private sector, academia, media, civil society that participated	ACU- private sector-academia-media-civil society

Core Activities	Activities	Indicators	Responsibilities
Objective 2: Strengthening Partnership On Anti-Corruption Works At International Framework			
1. To expand relations with anti-corruption agencies in and outside regions	1.1. To promote cooperation between ACU and anti-corruption institutions in and outside the region and international organizations working to support anti-corruption works.	1.1.1 Numbers of cooperation between ACU and anti-corruption institutions in and outside the region and international organizations working to support anti-corruption works. 1.1.2. Numbers of MoUs.	ACU
2. To promote participation in regional and international multilateral mechanisms on anti-corruption work	2.1. To participate in regional and international forums	2.1.1. Number of regional and international forums attended	ACU
	2.2. To increase the scope of capacity building of ACU officials with international partners	2.2.1. Number of partners providing capacity building of ACU officials	ACU
Objective 3: Promoting Cooperation And Coordination On Anti-Money Laundering And The Recovery of proceeds of Crime			
1. To promote anti-money laundering work and the recovery of the proceeds of crime	1.1. To strengthen simultaneous investigations between criminal offenses and money laundering offenses	1.1.1. Standard Operating Procedures (SOP) for investigations, including money laundering investigations, have been improved 1.1.2. Number of simultaneous investigations between criminal offenses and money laundering offenses	ACU

Core Activities	Activities	Indicators	Responsibilities
	1.2. To train on investigative skills, financial information analysis, detection of proceeds of crime, seizure and money laundering	1.2.1. Have in place a program to develop capacity in investigative skills, financial information analysis, detection of proceeds of crime, seizure and money laundering 1.2.2. Number of officials trained	ACU
	1.3. To promote more effective management and temporary disposal of seized and confiscated items	1.3.1. Statistics on management and temporary disposal of seized items 1.3.2. Number of executions of seizures pursuant to judgments or final orders	ACU - Ministry of Justice, Courts, Related Ministries-Institutions
	1.4. To expand and strengthen cooperation with national and international institutions on anti-money laundering work, tracing assets related to crimes, and confiscating the means of committing crimes and the proceeds of crime.	1.4.1. Coordinate with relevant national ministries and institutions and international institutions on anti-money laundering work, tracing assets related to crimes, and confiscating means of committing crimes and proceeds of crime. 1.4.2. Amount of assets related to crimes that have been confiscated	ACU - Ministry of Justice, Courts, Related Ministries-Institutions
	1.5. To strengthen monitoring of actions by the prosecution and courts on the temporary freezing of seized objects and confiscation of proceeds of crime.	1.5.1. Number of cases monitored related to freezing, temporary disposition of seized objects and confiscation of proceeds of crime 1.5.2. Number of assets frozen, temporary disposition of seized objects and confiscation of proceeds of crime	ACU - Ministry of Justice, Courts, Related Ministries-Institutions

Core Activities	Activities	Indicators	Responsibilities
2. To continue using existing mechanisms of cooperation and coordination on anti-money laundering and the recovery of proceeds of crime	2.1. To coordinate anti-money laundering investigation and the recovery of proceeds of crime	2.1.1. Number of cases coordinated	ACU- Relevant law enforcement authorities
	2.2. To strengthen the capacity of ministries, institutions and relevant actors to ensure the effectiveness and sustainability of work against money laundering and terrorist financing	2.2.1. Number of training courses and officials participated	ACU- Relevant Ministries and Institutions
	2.3. To prepare and implement action plans as set out in the National Strategy for Combating Money Laundering and Terrorist Financing	2.3.1. Have in place an action plan as set out in the National Strategy for Combating Money Laundering and Terrorist Financing	ACU- Relevant Ministries and Institutions
3. To build institutions and stakeholders capacity on legal assistances and legal instruments to support mutual legal assistance works effectively.	3.1. To conduct training for central-authority officials and relevant officials on mutual legal assistance.	3.1.1. Numbers of trained officials	ACU- Ministry of Justice
	3.2. To organize and disseminate the guidelines on request and provision of mutual legal assistance.	3.2.1. Numbers of mutual legal assistance 3.2.2. Guidelines on request and provision of mutual legal assistance. 3.2.3. Numbers of institutions and stakeholders disseminated on guidelines.	ACU- Ministry of Justice
	3.3. To promote the effective implementation of mutual legal assistance requests and provision, including the direct enforcement of foreign court judgments/orders.	3.3.1. Number of requests and mutual legal assistance	ACU
4. To Strengthen other forms of international	4.1. To enhance capacity building of law enforcement officials in other forms of international cooperation other than mutual legal assistance	4.1.1. Numbers of trained officials	ACU

Core Activities	Activities	Indicators	Responsibilities
cooperation besides mutual legal assistance	4.2. To promote the implementation of other forms of international cooperation besides mutual legal assistance	4.2.1. Number of cooperation	ACU
VI. STRATEGY ON STRENGTHENING INSTITUTION'S CAPACITY AND INTEGRITY AND MONITORING AND EVALUATION ON IMPLEMENTATION OF STRATEGIC PLAN			
Objective 1: Strengthening capacities, Resources and Integrity of Anti-Corruption Institution			
1. Increase AI Knowledge/Capacity	1.1. Organize awareness campaigns to educate/familiarize ACU officials with AI	1.1.1. ACU-level dissemination 1.2. Department and specialized division-level dissemination	ACU
	1.2. Arrange courses and studies at intermediate and expert levels (Theory and Practice)	1.2.1. General course on theory 1.2.2. Course on AI application	ACU
	1.3. Prepare and equip material infrastructure and human resources	1.3.1. Equipping pilot small-scale material infrastructure 1.3.2. Continuing to equip medium-scale material infrastructure	ACU
2. Enhance infrastructures of technical tools and ICT	2.1. Equip technical tools and ICT for professional works.	2.1.1. Technical tools and ICT for professional works.	ACU
	2.2 Expand physical infrastructure	2.2.1 Office building, library, archive and anti-corruption museum.	ACU
3. to expand digitalization	3.1. To prepare and equip computers, digital equipment, software, and necessary information systems.	3.1.1. Equipped with computers, digital devices, software and the Internet 3.1.2. Number of programs that process work using digital technology and digital data	ACU
	3.2. To increase digital literacy training and digital skills for managements and officials.	3.2.1. Number of programs on digital experience and knowledge sharing with management and officials	ACU

Core Activities	Activities	Indicators	Responsibilities
4. To strengthen management of ACU officials in complied with law on status of civil servants	4.1. Develop human resource management system for ACU officials.	4.1.1. Human resource management system for ACU officials.	ACU
	4.2. Promote physical educations, sports and health programs.	4.2.1. Number of physical educations, sport, and health programs. 4.2.2. Number of ACU officials participated in physical educations, sports and health programs.	ACU
5. To strengthen implementation of internal regulations and integrity	5.1. To disseminate internal regulations and integrity.	5.1.1. Program on dissemination. 5.1.2. Number of officials participated in dissemination programs.	ACU
6. Establish municipal-provincial anti-corruption offices	6.1. To establish municipal-provincial anti-corruption offices.	6.1.1. Numbers of municipal-provincials offices. 6.1.2. Numbers of officials sent to municipal-provincial offices.	ACU
Objective 2: Strengthening monitoring and evaluation of the implementation of the National Anti-Corruption Strategic Plan, Phase 4			
1. To strengthen monitoring and evaluation mechanisms regularly	1.1. Prepare a report on the implementation of the monitoring and evaluation of the implementation of the strategic plan for the National Anti-Corruption Council.	1.1.1. Monitoring and evaluation report	ACU
	1.2. Prepare an annual report to the public on anti-corruption work	1.2.1. Number of reports to the public on anti-corruption work	ACU
	1.3. Prepare a semi-annual report of the National Anti-Corruption Council to the Head of the Royal Government	1.3.1. Number of reports of the National Anti-Corruption Council to the Head of the Royal Government	ACU

Core Activities	Activities	Indicators	Responsibilities
VII. Strategy for Capacity Development and Information Security in Countering Corruption Offenses via AI			
Objective 1: Rapidly initiate and expand ACU's AI capacity			
1. Increase AI Knowledge/Capacity	1.1. Organize awareness campaigns to educate/familiarize ACU officials with AI	1.1.1. ACU-level dissemination 1.1.2. Department and specialized division-level dissemination	ACU
	1.2. Arrange courses and studies at intermediate and expert levels (Theory and Practice)	1.2.1. General course on theory 1.2.2. Course on AI application	ACU
	1.3. Prepare and equip material infrastructure and human resources	1.3.1. Equipping pilot small-scale material infrastructure 1.3.2. Continuing to equip medium-scale material infrastructure	ACU
2. Enhance AI Skills	2.1. Enhance AI skills internally by ACU itself	2.1.1. Utilize outstanding ACU officials - skilled personnel in AI to train other officials and staff	ACU
	2.2. Enhance AI skills through domestic experts	2.2.1. Exchange or learn from domestic individuals/groups/units skilled in AI	ACU

Core Activities	Activities	Indicators	Responsibilities
	2.3. Enhance AI skills through foreign AI experts	2.3.1. Go abroad via study visits, workshops, and courses 2.3.2. Receive foreign AI experts to conduct training at ACU	ACU
Objective 2: Gradually enhance ACU's capacity to counter challenges posed by tech crimes involving impersonation/forgery			
1. Strive to counter negative phenomena resulting from AI development	1.1. Legal and normative documentation work	1.1.1. Internal legal documents of ACU 1.1.2. External legal documents of ACU	ACU
	1.2. Develop strategies and tactics on how to position against the fragmentation of AI technology blocks/geopolitics	1.2.1. ACU Research Group (ART Group) conducts timely studies	ART
2. Strive to counter the increase in domestic and cross-border financial crimes	2.1. Establish study and analysis teams for domestic and cross-border financial crimes	2.1.1. Form 2 to 3 teams	ART
	2.2. Monitor flow, money laundering, and asset concealment enhanced by AI	2.2.1. Organize teams according to each specific theme	ART
3.. Enhance forensic and investigative capacity	3.1. Enhance forensic capabilities regarding various AI-generated fraud/forgery acts	3.1.1. Form forensic teams	ACU

Core Activities	Activities	Indicators	Responsibilities
	3.2. Enhance capacity to prevent fraud, especially in examinations, using AI	3.2.1. Form special investigation teams	ACU
4. Share information and ensure security of shared information	4.1. Enhance specialized skills in AI-based information sharing while ensuring political security and safety	4.1.1. Continuously process, strengthen, extract lessons learned, and reinforce these tasks	ACU

6. Strategic Plan and Budget

ACI has a separated package of budget for its operation equivalent to 0.2% - 0.3% of the total national current expenditure according to sub-decree N° 06 dated 10 January 2011 on management and allocation budget of ACI. ACU may request additional funds from the Royal Government if necessary, in special cases. Moreover, ACU is authorized to receive donations or assistance from national and international organizations and development partners under conditions that do not involve conflict of interests.

The ACU will implement a performance-based budgeting system as the final stage of the Public Financial Management Reform Program of the Royal Government, aligning with the Phase IV strategic plan.

7. Monitoring and Evaluation

Monitoring and evaluation through existing and continuously improved mechanisms are essential and necessary to ensure the effectiveness of the implementation of the National Anti-Corruption Strategy Phase IV (2025-2030), maintaining transparency and accountability.

Work implementation monitoring will track progress, results, and achievements against the targets or indicators set in the strategy, aiming to improve effectiveness and achieve the maximum expected outcomes.

Follow-up indicators for the implementation of key activities stipulated in the National Anti-Corruption Strategic Plan for departments, working groups and stakeholders to use in the regular monitoring and evaluation process. Semi-annual and annual performance reviews will also be conducted in addition to the monthly monitoring and evaluation program by the Strategic Plan Monitoring and Evaluation Team.

Certain activities will be implemented by relevant institutions, with data and inputs provided by those institutions playing a critical role in measuring performance. Evaluations will be based on indicators or criteria to assess efficiency, effectiveness, impact, challenges, and sustainability of the National Anti-Corruption Strategy Phase IV's implementation. Specific activities may be selected for detailed evaluation when necessary.

8. Reporting and Dissemination

Semi-annual and annual reports on performance and achievements shall be prepared by monitoring and evaluation working group on the implementation of strategic plan based on data and analysis made by departments, working groups and stakeholders monthly, semi-annually and annually. The dissemination of monitoring and evaluation report shall be made in the form of focusing the core content as well as the findings resulted from the monitoring and evaluation within ACU and by all means and in all other forums.

9. Revisions

In the process of implementing the fourth phase of the National Strategic Plan (2025-2030), NCAC will conduct consultations, provide recommendations, support, and encourage ACU, as the executive body to rigorously implement its action plans with high responsibility, aligned with the vision, mission, values, policies, and strategies outlined. With this regard, NCAC also acknowledges the incidental requirement and necessity in revising or adding up all activities needed in accordance with circumstances required by the executive body for the implementation

10. Conclusion

The Seventh Mandate Royal Government under the fervent and dynamic leadership of **Samdech Moha Borvor Thipadei Hun Manet, Prime Minister**, has embarked promptly on its journey with a series of strategic leadership programs and realistic action plans. These initiatives have been drawn from the achievements and extensive experiences of previous mandates of the Royal Government, led by the wise and skillful leadership of the greatest man of Cambodia, **Samdech Akka Moha Sena Padei Techo Hun Sen**. The beneficial policy programs and action plans are further strengthened by experiences gained from the implementation of the Phase III Strategy (2020-2025), as well as through consultations and collaborative work with all relevant stakeholders—directly and indirectly, both national and international. These have played a tripartite role in providing guidance, direction, and focus to ensure efforts are more targeted, broadened in scope, and better integrated across the six strategic fronts that have been identified and will continue to be implemented over the next five years in the fight against corruption. This strategic anti-corruption effort will be led by the Anti-Corruption Unit and in coordination with other stakeholders such as state institutions, the private sector, legislative bodies, academia, the media, and civil society.

Key strategic activities, along with other highlighted initiatives in this Phase IV plan, will be carried out creatively and flexibly based on the context and real-world developments to maximize achievable results. The implementation of these actions, including newly required ones during the execution of the plan, will be updated and aligned with upcoming programs and policies to be issued by the Royal Government. Additionally, to ensure effectiveness and accountability in the implementation of the plan, regular monitoring, inspection, and evaluation will be conducted through direct dialogue with implementers, data collection and analysis, statistical review, and assessments of the success levels and challenges of the real-world execution of the outlined actions. This will be done through modern mechanisms aided by information technology to generate actionable recommendations for improved implementation and to produce comprehensive reports on the plan's execution regularly.

NCAC remains committed to fulfilling its duties and responsibilities over the next five-year mandate. It will continue to support, advise, and provide recommendations and operational directions for the activities implemented by the Anti-Corruption Unit to ensure legal compliance, effectiveness, and efficiency. It will also ensure continued progress on the right path toward building a clean Cambodian society, free from corruption, and support the sustainable leadership and development efforts of the Royal Government. This will help realize the vision, mission, policies, values, goals, and strategies outlined in the **National Anti-Corruption Strategic Plan Phase IV (2025-2030)**.

PRESIDENT	Samdech Kitti Sangha Pandita MEN SAM AN	
VICE- PRESIDENT	H.E Mr. TOP SAM	
MEMBERS	Samdech Moha Montrei KUY SOPHAL	
	H.E Mr. KOEUT RITH	
	H.E Mrs. SOM KIM SOUR	
	H.E Mr. HENG VONGBUNCHHAT	
	H.E Mr. TAING SUNLAY	
	H.E Mr. KEO REMY	
	Kitti Nitti Kosal Pandita OM YENTIENG	
	H.E Mr. LAY SAMKOL	
	H.E Mr. CHIV KENG	

11.Collection of Images

National Council Against Corruption – Mandate IV



The National Council Against Corruption, 4th Mandate, takes an oath before entering office at the Tevea Vinichhay Pavilion, Royal Palace, on August 19, 2025.

National Council Against Corruption – Mandate IV



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National Council Against Corruption – Mandate IV



First meeting of the National Council Against Corruption
to vote for the election of the Chairman, Vice-Chairman of
the National Council, 4th Mandate.

National Council Against Corruption – Mandate IV



First meeting of the National Council Against Corruption
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National Council Against Corruption – Mandate IV



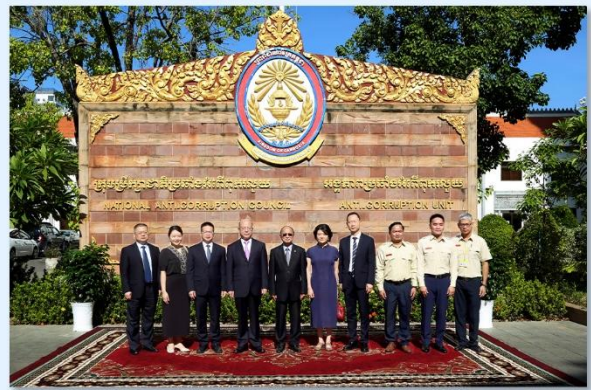
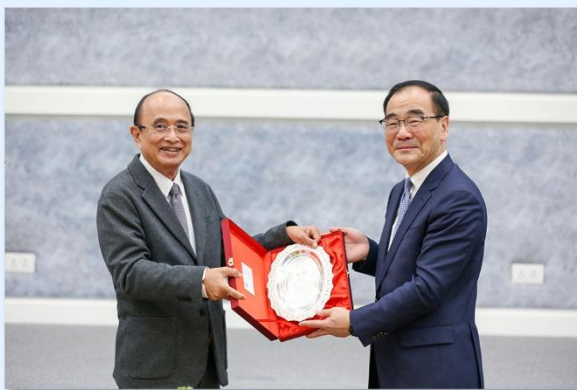
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to vote for the election of the Chairman, Vice-Chairman of
the National Council, 4th Mandate.

1. National Council Against Corruption



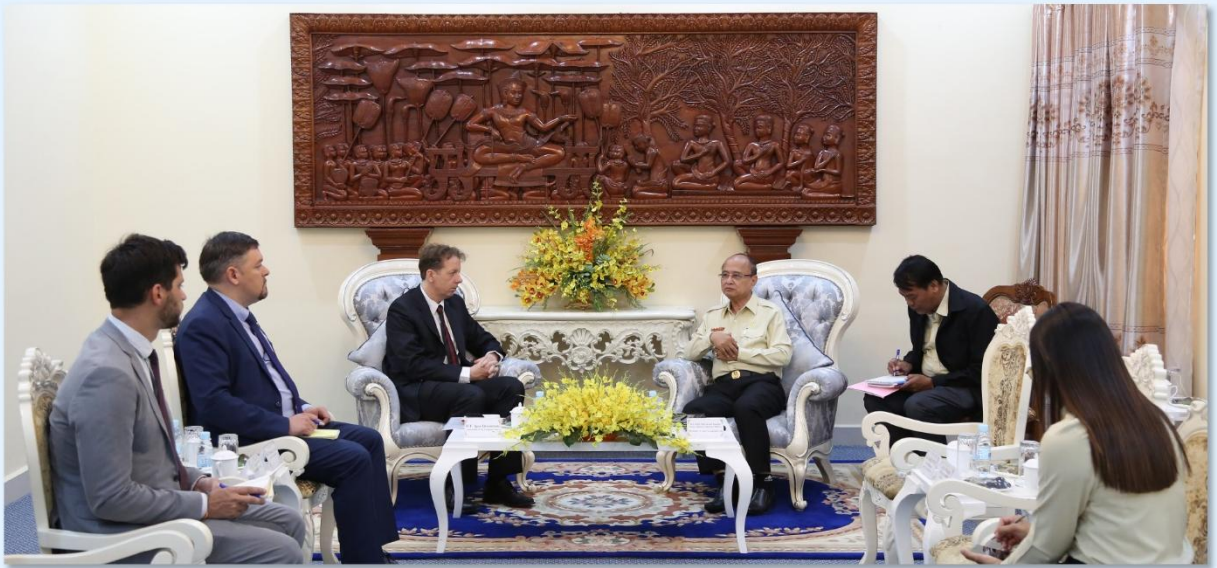
Monthly meeting of the National Council Against Corruption
to listen to the report on the work activities of the ACU
and approve a number of tasks of the ACU.

2. Discussion Meeting on the Anti-Corruption



Discussion meeting on the anti-corruption
with international counterparts

2. Discussion Meeting on the Anti-Corruption



Discussion meeting on the anti-corruption
with international counterparts

3. Dissemination of the law on Anti-Corruption



Lecture on the "Law on Anti-Corruption" to national police officers.

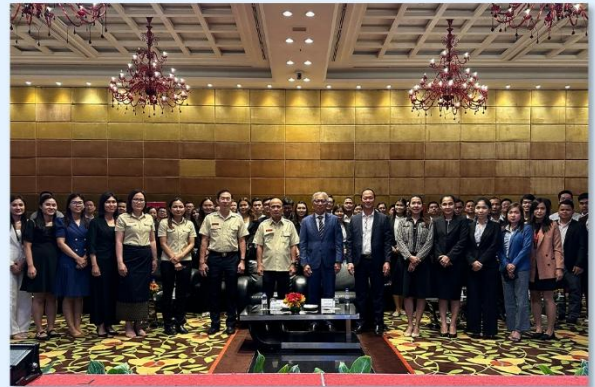


Lecture on the "Law on Anti-Corruption" to leaders and civil servants
of the General Department of Taxation.



Lecture on the "Law on Anti-Corruption" to students of the Royal Academy of Justice of Cambodia.

3. Dissemination of the law on Anti-Corruption



Lecture on the "Law on Anti-Corruption" to the private sector.



Lecture on the "Law on Anti-Corruption" to vocational Training Centers and schools.

3. Dissemination of the law on Anti-Corruption



Dissemination of the Anti-corruption law
at the national and sub-national levels.

3. Dissemination of the law on Anti-Corruption



Conducting anti-corruption awareness campaigns on the occasion of celebrating the National and International Anti-Corruption Day, December 9.

3. Dissemination of the law on Anti-Corruption



Conducting anti-corruption awareness campaigns on the occasion of celebrating the National and International Anti-Corruption Day, December 9.

4. Prevention and Obstruction of Corruption



Observation of the High School Baccalaureate Exam (Bac II) and examinations across various ministries and institutions to ensure transparency and integrity of the examinations.

4. Prevention and Obstruction of Corruption



Prevention and obstruction of corruption activities during the observation process of civil servant examinations across various ministries and institutions.

5. Law Enforcement to Crack Down on Corruption



Operational work of building case files to be forwarded to court.



Receiving qualification as judicial police officers.

5. Law Enforcement to Crack Down on Corruption



Operational work of building case files to be forwarded to court.

6. National and International Cooperation



Signing of a Memorandum of Understanding between the ACU and Cambodia Post.



Discussion meeting with the private sector on anti-corruption tasks.



International Cooperation.

6. National and International Cooperation



Training courses under national cooperation.



Training courses under international cooperation.

6. National and International Cooperation



National cooperation in the fight against corruption.

6. National and International Cooperation



International cooperation in the fight against corruption.

6. National and International Cooperation



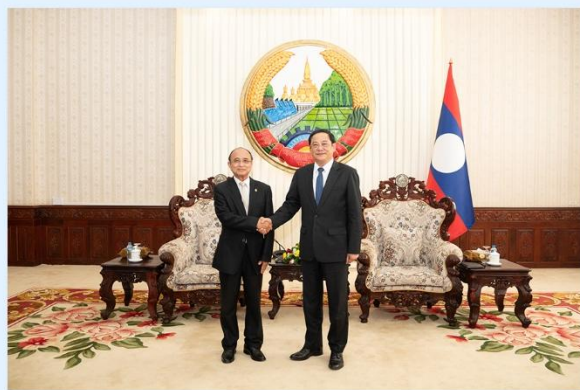
International cooperation in the fight against corruption.

6. National and International Cooperation



International cooperation in the fight against corruption.

6. National and International Cooperation



International cooperation in the fight against corruption.

6. National and International Cooperation



International cooperation in the fight against corruption.

MEANS OF FILING A COMPLAINT



Hotline 1282

Tel: 023 223 954
023 221 653



Drop a complaint into the
complaint box at any time,
written on an envelope
addressed to
"To the Anti-Corruption Unit"



Complain directly

at the Anti-Corruption Unit

Building No. 54,
Preah Norodom Blvd.,
Sangkat Phsar Thmey 3,
Khan Daun Penh, Phnom Penh



**Drop a complaint
into the complaint box**

(at public boxes in Phnom Penh)



Write an Email and send it to:
complaint@acu.gov.kh



or write a message and send it
to the Facebook page:

Anti-Corruption Unit



**Complain directly to
an official of the
Anti-Corruption Unit**



ADDRESS

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