ANNUAL REPORT

2024-2025

UNITED AGAINST CORRUPTION

ANTI-CORRUPTION COMMISSION

" Guided by core Bhutanese values like loyalty and integrity, we will create a city that is free of corruption, drugs, and crime—one that offers both the infrastructure and the governance needed for long-term prosperity."

His Majesty The King, 17th December 2024

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Section 4: Proactive, Intelligence, and Technology-based Corruption Deterrence expounds on the extent of corruption prevalence and the enforcement thereof.

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Section 6: Challenges and recommendations discuss issues, risks, and possible solutions in the fight against corruption.

INTRODUCTION

The reporting year 2024-2025 marks a defining milestone for the Anti-Corruption Commission (ACC) as it concludes the tenure of the Third Commission. This Annual Report, as the final submission of the outgoing Commission, is not only an account of the year but also a reflection on the institutional journey of the past five years. A journey defined by leaning into change, thriving through crisis and a steady evolution shaped by a deliberate and collective shift toward greater clarity, purpose, and collaboration to better meet the demands of a fast-changing environment and serve its mandate.

Since the appointment in October 2020, the Third Commission assumed office amid the disruptions of the COVID-19 pandemic, which compelled the ACC to adapt its operations to remote modalities and accelerate the use of technology. In December 2021, His Majesty The King's clarion call during the 114th National Day galvanized the ACC into a heightened *Mission 114: RED Capacity* mode, sharpening its focus on Role, Enforcement, Deterrence, and Capacity. Guided by this framework, the ACC embraced the principle of "*one for all and all for one*" and the discipline of doing "*more with less*", optimizing limited resources, leveraging digital solutions, and reinforcing the national integrity system.

Over the past five years, the ACC has institutionalized integrity tools across public agencies, advanced private sector and civil society standards, expanded advocacy nationwide, and consolidated partnerships within the justice sector. The rollout of digital systems, including a revamped Complaints and Investigation Management System (CIMS) and new analytical tools, reflected a shift toward technology as a core driver of resilience and efficiency. Despite high attrition and resource constraints, the Commission safeguarded institutional continuity while steadily building capacity in critical areas.

These five years also witnessed Bhutan's global integrity standing gain traction and move up the scale. The Transparency International Corruption Perceptions Index (CPI) improved from 68 in 2020 to 72 in 2024, elevating Bhutan from 24th to 18th globally and reaffirming the nation's position as one of Asia's least corrupt countries. The recalibrated National Integrity Assessment (NIA) likewise recorded its highest score since 2016. These outcomes are a collective merit of all governance institutions and reflect the national ethos that integrity is the foundation of our pursuit of **Developed Nation** status by 2034.

As Bhutan enters a transformative era marked by private-sector-led growth, digital governance, and transformative project such as the *Gelephu Mindfulness City*, the demands on the national integrity system will only intensify. The ACC, as a constitutional body, has positioned itself not merely as an enforcer but as a proactive guardian of systems, anticipating risks, mitigating vulnerabilities, and ensuring that corruption remains a **high-risk, zero-benefit crime.**

The Annual Report 2024-2025 is the 18th Report being submitted to His Majesty The Druk Gyalpo, the Prime Minister, and Parliament as per Article 27(4) of the Constitution of the Kingdom of Bhutan and Section 169(1) of the Anti-Corruption Act of Bhutan (ACAB) 2011. These initiatives are presented in Six Sections of this Annual Report.

SECTION
01

KEY HIGHLIGHTS OF THE OUTGOING COMMISSION (2020-2025)

Appointed on 14 October 2020
Completed on 13 October 2025

- Role – Advancing National Integrity
- Enforcement – Strengthening Accountability
- Deterrence – Legal Action
- Capacity – Institutional Competence, Readiness and Resilience

KEY HIGHLIGHTS OF THE OUTGOING COMMISSION (2020-2025)

The last five years have been pivotal for the ACC, shaped by His Majesty's clarion call during the 113th National Day Address in 2020 followed by 114th National Day Address in 2021:

> **The strength of our national character, exemplified by the courage and determination of our forefathers, has weakened; complacency has set in, discipline has waned, and corruption is on the rise. [...] We must not hesitate to expose those who engage in corrupt practices, so that we send a strong signal to deter others from doing so.**

These Royal Command not only reaffirmed the constitutional mandate but also served as a decisive catalyst for the ACC to accelerate its efforts in a heightened "*mission mode*". Towards this, the ACC launched **Mission 114: RED Capacity**, a framework that anchored the following four focus areas:

- ● *Role* in advancing national vision of a corruption free society;

- ● *Enforcement* of anti-corruption laws and policies for transparent and accountable systems;

- ● *Deterrence* to ensure corruption is high-risk zero-benefit crime; and

- ● *Capacity* to remain relevant and competent to effectively meet and deal with the emerging issues and opportunities.

Guided by this framework, the ACC, over the last five years, aligned its operational and strategic initiatives to these four areas, ensuring greater focus, coherence, and agility in advancing the national integrity agenda.

Role – Advancing National Integrity

- **Global and National Integrity Standing:** Bhutan's score in Transparency International's CPI improved from 68 in 2020 to **72** in 2024 in vulnerable sectors, moving the country's rank from 24th to **18th** globally; **3rd** in Asia after Singapore and Hong Kong; and 5th in the Asia-Pacific Region. This progress is attributed to strengthened rule of law, effective anti-corruption mechanisms, and institutional reforms, though challenges remain in regulatory quality,
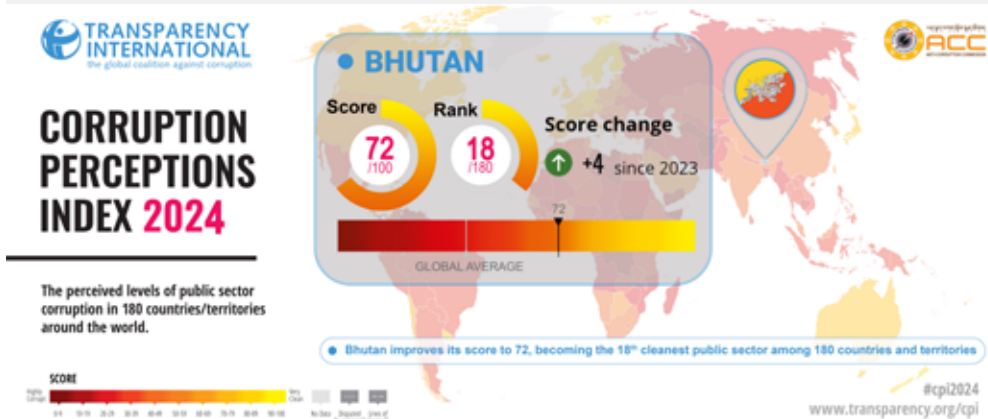
revenue mobilization, and public sector integrity in vulnerable sectors. Importantly, the CPI 2024 linked corruption to climate challenges, cautioning that corruption undermines climate policy, diverts funds, weakens oversight, and endangers vulnerable communities. Accordingly, it called on governments to uphold integrity in climate governance, strengthen investigations and sanctions, promote citizen engagement, and reinforce justice and business integrity systems to ensure sustainable, corruption-resilient development. Similarly, the NIA score rose from 7.97 in 2019 to **8.01** in 2022, highlighting sustained collective efforts in fighting corruption. Comparing the last three assessments, excluding the new indexes on Ethical Leadership and Parliamentary Integrity, the recalculated 2022 score stands at 8.24 – the highest since 2016, reflecting a steady upward trend from 7.95 (2016) to 8.24 (2022).
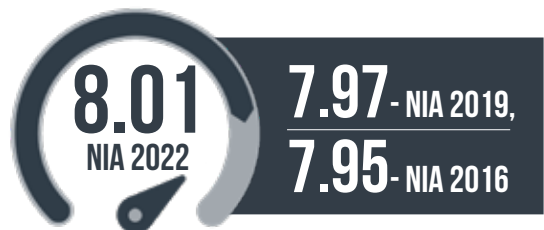
- **Public Sector Integrity**: Integrity mainstreaming under the National Integrity and Anti-Corruption Strategy (NIACS) framework has shown clear progress. The **Organizational Integrity Plan (OIP)** average score improved significantly from 50.03% in Financial Year (FY) 2020-2021 to **83.90%** in FY 2023-2024, reflecting stronger adoption of anti-corruption tools. The **Asset Declaration (AD)** system sustained high compliance, improving from 84.6% in FY 2022-2023 to **85.58%** in FY 2024-2025, with deadline compliance holding steady at **99.8%**. Since 2022, the **Integrity Vetting System (IVS)** has processed **24,080** reports, mostly for recruitment and promotion, with very few adverse findings, demonstrating both scale and credibility in preventive vetting.

- **Private Sector Integrity**: Integrity scores across 31 State-Owned Enterprises (SOE) averaged **81.30%**, and the adoption of revised Debarment Rules in 2023 strengthened contractual accountability. The revised business integrity strategy titled **DAMTSI-BIZ** (*Developing Accountable and Moral, Trustworthy and Successful Individuals and Businesses*) draws on international peer learning and sectoral training modules, particularly targeting high-risk industries such as construction, tourism, financial institutions, etc.. to institutionalize compliance and incentives for clean business practices.

- **Civil Society Integrity**: The introduction of the **Bhutan CSO Accountability Standards (BCAS)** in 2023 marked a first step in mainstreaming accountability in the CSO sector. While the inaugural score reached 75.62% in FY 2023-2024, it dipped to **58.07%** in FY 2024-2025, pointing to uneven implementation and the need for renewed effort. A national training module on anti-corruption for all registered CSOs has been developed to strengthen this domain.

- **Advocacy, Training, and Engagement**: Youth engagement has scaled significantly under the **DAMTSI (Developing Accountable, Moral, Trustworthy, and Successful Individuals)** framework, with **21** integrity clubs across 20 Dzongkhags, integration of DAMTSI module into scouting, Early Childhood Care and Development (ECCD), Not in Education, Employment or Training (NEET) programs, and curricula in select higher education institutes. The Youth Integrity Survey 2022 recorded awareness at **70.72%**, evidencing early impact. Broader outreach covered 155 Gewogs in the third advocacy cycle, alongside 117 interactive sessions and 91 vulnerability-based trainings

for various professionals. Sector specific e-learning course on ethics and integrity covered parliamentarians, judges, civil servants, and corporate employees. The annual observance of **National Anti-Corruption Day** on 21 February further anchored public awareness.

- **Vulnerability Assessment and Research**: The institutionalization of Corruption Risk Management (CRM) within internal audit functions has broadened

proactive ownership of risk mitigation. Between 2020 and 2025, the ACC completed seven proactive and six reactive system studies across high-risk sectors including tourism, construction, medicine licensing, timber extraction, bank lending, and media. These studies embedded systemic reforms and informed policy design. Looking forward, the 6th NIA, expanded to include CSOs, the private sector, and a corruption case index, will provide a more comprehensive national picture of integrity.

Enforcement – Strengthening Accountability

- **Corruption Reports by Mode**: Over the last five years, corruption report volumes have fluctuated, peaking at 451 in FY 2020-2021, declining to 322 in FY 2023-2024, and rebounding to **364** in FY 2024-2025. The turnaround time (TAT) for complaints resolution has been reduced from 9.7 working days (FY 2019-2020) to **3.9 working days** in the last FY. Mode preferences have shifted notably wherein *Webmail* dominated from 2020-2023, but in FY 2023-2024, *Walk-ins* overtook it as the top channel, suggesting growing trust in direct interaction, however, in FY 2024-2025, Webmail reporting again surged to the lead, showing a clear digital shift. Social media-based reporting such as *Juenlam ACC* and *MyACC app* has consistently remained marginal, with negligible uptake despite public familiarity, indicating persistent barriers such as awareness, trust, or usability.

- **Corruption Reports by Source, Area, and Agency**: Over the last five years, the trend in corruption report sources show a clear and sustained shift from predominantly anonymous submissions toward a majority of reports from known sources, reflecting growing public trust and confidence in the ACC. In FY 2020-2021, anonymous complaints dominated at 53.4%, but by FY 2021-2022, known reports (50.3%) surpassed anonymous ones for the first time. This reversal persisted and strengthened in FY 2022-2023 (59.4% known), FY 2023-2024 (58.7% known), and 2024-2025 (**56% known**), despite minor year-to-year fluctuations. The rise in known-source reporting suggests increasing transparency, awareness, and willingness to be identified, possibly bolstered

by outreach and confidence-building measures. However, the continued presence of a substantial proportion of anonymous reports with still over 40% in recent years indicates ongoing concerns about retaliation, personal safety, and the adequacy of whistleblower protections. Sectoral risks evolved from *Resources* (2020-2022) to *Public Revenue* (2022-2023) and most recently to *Finance* (2024-2025), highlighting emerging vulnerabilities. *Abuse of Function* remained the most common offence, consistently comprising 52-56% of all merited cases, reflecting entrenched misuse of authority despite overall declines in report volume. Geographically, *Thimphu* persisted as the principal hotspot, while institutionally, *Gewog Administrations* and *Ministries* accounted for the bulk of reports year after year, underscoring systemic vulnerabilities in high-discretion, high-contact areas of governance.

● **Corruption Reports of Administrative Nature:** Between FY 2020-2021 and FY 2024-2025, corruption reports shared for action declined steadily from 122 to **29**, while pending Action Taken Reports (ATR) dropped sharply from 52 to just **nine**, reflecting significant gains in timeliness and efficiency. This progress is largely attributable

to the operationalization of the Administrative Complaints Resolution Division (ACRD) in 2024 and the ACC's proactive measures such as issuing advisory notes and sensitizing agencies, which have fostered quicker responses and stronger follow-up.

● **Corruption Reports Qualified for Investigation**: In the last five years, **10.40% (199)** of the total corruption reports received, including 39 in the last FY, qualified for investigation. *Civil servants* accounted for the majority of corruption reports qualified for investigation, and in terms of agency, *Ministries* and *Dzongkhag Administrations* recorded the highest numbers.

● **Justice Sector and Law Enforcement Agencies (LEA)**: Adoption of the Justice Sector Strategic Plan 2024-2029, which outline key deliverables on system integration among four core justice institutions, mainstreaming of integrity promotion initiatives within the justice sector institutions, and enhancing cross-sectoral coordination on issues such as due process, *elementization* of offenses, professional development, business justice, etc. In parallel, three rounds of the Tripartite Forum between the ACC, Office of the Attorney General (OAG) and Royal Audit Authority (RAA) finalized the Standard Operating Procedure

(SOP) for Missing Persons, agreed on the 24% penalty application, reconciled restitution figures, and set agency-specific TATs alongside operationalization of the shared data-exchange platform named the **TRUST** (*Tripartite Realtime Update Sharing Terminal*).

Deterrence – Legal Action

- **Caseload**: Over the last five years, the ACC completed **197** investigations, including 39 in the most recent FY, with the share of proactive investigations more than doubling to **31.15%** from 13.30% in FY 2021-2022. The caseload showed an overall upward trajectory, peaking at 77 cases in FY 2022-2023 before stabilizing at 61 in FY 2024-2025, where new cases reached their highest level (39), indicating a shift from spillover-driven to new-case growth as shown in **Figure 1.1**. Investigation TAT steadily improved from 73 working days in FY 2020-2021 to **52.47 working days** in FY 2024-2025, outperforming the 12th FYP baseline of 90 days, while clearance rates fluctuated, rising sharply to 72.70% in FY 2022-2023 due to the establishment of Regional Offices in Bumthang, Phuntsholing, and Trashigang, before moderating to **63.93%** in FY 2024-2025 as shown in **Table 1.1**. Operationally, a total of **60 search/seizure** operations were conducted between the FY 2020-2021 to FY 2024-2025 and **54** individuals detained during the investigation process.

Figure1.1: Caseload by nature of case assignment

Table 1.1: TAT and Clearance Rate in the last five years

Financial Year	TAT to complete a case (in working days)	Clearance Rate
2024-2025	52.47	63.93%
2023-2024	54.7	68.20%
2022-2023	65.5	72.70%
2021-2022	70.9	50.85%
2020-2021	73	50.00%

- **Profile of Cases**: Since 2006, approximately 2,878 individuals have been implicated in corruption cases, of which **26.48%** were civil servants. In the last FY alone, 485 individuals (441 male and 44 female) were implicated. Private employees formed the largest group (346), followed by civil servants (42) and armed personnel (37) – a sharp increase in private-sector involvement this year due to the investigation into the monument fees collection. By offence type, most were charged with participation in an offence (438), followed by omission amounting to abuse of function (45), commission amounting to abuse of function (26), and active bribery of a public servant.

- **Prosecution Referral, Conviction, and Restitution**: From 2006 to June 2025, investigation into a total of 482 cases was completed, of which 313 cases were referred for prosecution, bringing the average prosecution referral rate to **64.94%**. In the last five years, a total of 197 cases were completed, out of which 107 were referred for prosecution. While the average prosecution referral rate for the last five years was at 54.31%; the highest rate of 73.21% was reached in FY 2022-2023 followed by 66.67% in FY 2024-2025. The average conviction rate in the last five years stands at **84.58%**, with the record high of 93.50% reached in FY 2023-2024. In total, **Nu.480.638 million** was prayed for restitution in the last five years, contributing to an aggregate restitution prayer of **Nu.3.984 billion** since 2006.

- **Post-Investigation Disciplinary Actions**: Post-investigation disciplinary actions enforced in the last FY include actions against 94 individuals implicated in 32 cases, resulting in recoveries amounting to Nu.13.201 million.

- **Cases Pending Investigation, Under Review, and Trial**: Pending reports awaiting assignment for investigation have been reduced to **32**, down from 132 in January 2020. As of June 2025, there are **49** cases under review by the OAG and **18** cases under trial at various Courts.

- **Legal Framework**: Successfully completed two cycles of Bhutan's country review of the United Nations Convention Against Corruption (UNCAC) implementation, highlighting Bhutan's compliance to UNCAC and its anti-corruption efforts. Towards deterring corrupt practices by making corruption '*high cost, zero benefit*' crime, the Anti-Corruption Act of Bhutan 2011 (ACAB) amendment came through and various by-laws were adopted, including for the Management of Property under Provisional Measures to strengthen administration and management of frozen, seized, and confiscated property. Besides harmonization with the Penal Code on penalties, major highlights of the ACAB Amendment 2022 include the addition of the phrase '*cause loss to the State*' to the sections pertaining to abuse of function; criminalizing bribery of witness; management of seized or frozen properties; action based on the ATR; extending scope of liability of legal person and grading of the offence

for legal accountability; and incorporating the directives of Supreme Court on suspension of public servant.

- **Vigilance and Outreach**: For greater accessibility and vigilance across the country, three Regional Offices in Bumthang, Trashigang and Phuntsholing have been operationalized since April 2022. The three offices are mandated to undertake integrated multi-pronged functions of prevention, education, and investigation in the respective regions. These Regional Offices have contributed substantially to the investigation of cases and in the advocacy efforts.

Capacity – Institutional Competence, Readiness and Resilience

- **Institutional Performance**: The ACC's annual performance score of **91.60%** is at the 'Very Good' level for the FY 2024-2025. It is based on the evaluation of *14 objectives, 37 key results, and 64 key performance indicators*. While this is a decline from the previous year, the performance score has consistently remained above 90% over the past five years, recording 93.27% in FY 2020-2021, 96.60% in FY 2021-2022, and 94.33% in FY 2022-2023. This sustained performance indicates institutional stability in delivering its mandate in the face of extenuating circumstances.

- **Human Resources**: As of 30 June 2025, the staff strength is 134 against the total approved staffing of 165, consisting of 57 female and 77 male officials with the average age recorded at 34.2 years. Of the total workforce, 23.1% serve on a contract basis. The attrition rate for the last FY declined sharply to 8.33% from 17.95% in the previous year. However, the five-year average attrition rate of 12.8% remains significantly higher than the civil service average, underscoring ongoing challenges in workforce stability.

- **Internal Governance**: The recent internal compliance audit of policies, rules, and procedures for complaints management, investigation, and related business systems assessed compliance rate at **91.25%**, indicating robust internal controls. New policies, rules and guidelines adopted include those related to *Proactive Investigations; Talent Retention & Management; Data Governance and Management; Information Classification and Handling Standards; Publication Guidelines; Guidelines for Conduct of Administrative Inquiries; Rules on Management of Properties under Provisional Measures; and Innovation Dumra Initiative*.

- **Partnerships and Networking**: Formal and informal mechanisms of coordination have been put in place for a professional and effective partnership between the ACC and OAG in discharging the respective mandates. Most notably the joint launch of the **Elementization** of Corruption Offences on 30 December 2022 provided greater clarity, consistency, and precision in the interpretation and prosecution of corruption cases. This milestone reflects not only an institutional enhancement in terms of legal harmonization but also a deepening culture of professionalism, mutual respect, and commitment to a shared mission. Similarly, the tripartite mechanisms between the ACC, OAG and RAA fosters optimism for robust collaboration in the best public interest. Developed concept and initiated consultations on the proposed **Coordinated Research and Intelligence (CoRE) Network of Bhutan** among core agencies to strengthen capacity on proactive detection, analysis, and prevention of complex criminal and other threats. Engaged in 18 networking initiatives with seven national and eleven international agencies, advancing joint efforts in anti-corruption training, prevention programs, talent acquisition, and technology adoption.

INSTITUTIONAL
DEVELOPMENT

for continued anti-corruption momentum

- **Technology, Systems, and Processes (DAMTSI JOENSHING)**: Over the last five years, the ACC positioned technology as a strategic pillar for resilience, efficiency, and integrity. While the operational difficulties posed by the compulsions of the pandemic, the unprecedented attrition that followed and budgetary constraints greatly strained the ACC's capacity, it also prompted innovation and agility. Guided by the principle of "*one for all and all for one*", the ACC optimized whatever resources were at hand, leveraged digital solutions, and adapted its structures to maintain progress and indeed break new grounds. A key milestone in this effort is the ongoing rollout of the revamped CIMS designed to strengthen complaint and case handling as well as the development of new modules on the legal, follow-up, and intelligence functions. This includes the on-going works on various analysis, visualization, and report generation tools including through the use of Artificial Intelligence (AI). Additionally, the system will feature an Agency Integrity Maturity Score (AIMS) derived for agencies based on their integrity measures and corruption occurrences. Other modules under development include for monitoring and evaluation – a web-based system to monitor and review the status of education and prevention programs; and performance of the ACC. These modules, which represent the ACC's core functions, will feed into as well as feed off the central data repository. Towards this, the ACC has been digitizing all data on complaints, investigations, and judgments since 2006 to enhance institutional memory and provide real-time insights for prevention, research, and policy interventions. Complementing these efforts, internal processes have been automated through biometric attendance, online leave and visitor systems, dispatch management, and a secure information repository, with firewalls and server mirroring prioritized to safeguard sensitive data.

- **Budget and Expenditure**: Over the last five years (FY 2020-2021 to 2024-2025), the ACC was allocated a cumulative budget of **Nu.931.619 million** (Nu.670.463 million current and Nu.261.156 million capital). Actual expenditure over the same period stood at **Nu.720.549 million** (Nu.539.490 million current and Nu.181.059 million capital). Over the years, annual utilization has consistently remained above 95%, peaking at nearly **98.97%** in FY 2023-2024, demonstrating prudent financial management and efficient implementation of planned activities despite resource constraints. For the implementation of the activities in the FY 2025-2026, the ACC has been allocated Nu.170.082 million (Current Nu.129.452 m and Capital Nu. 40.630 m).
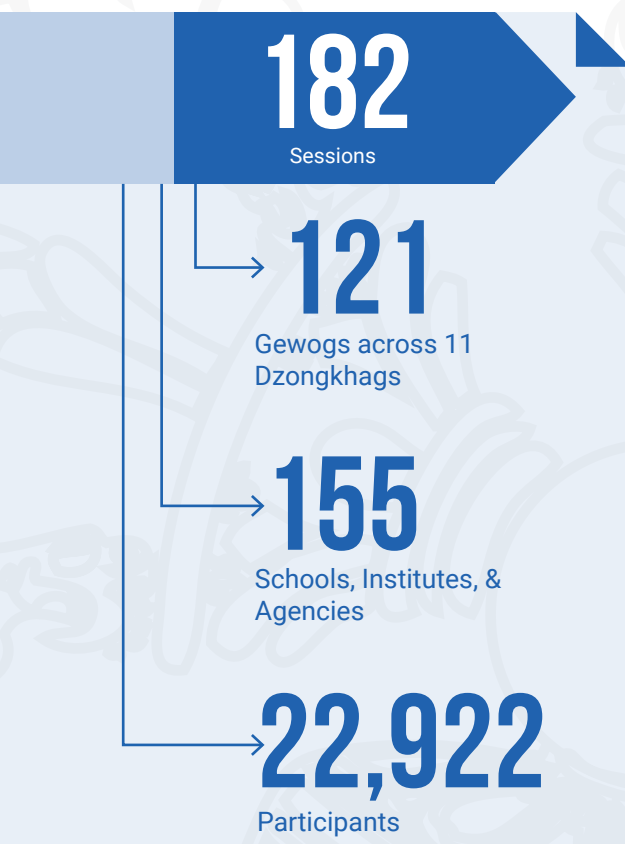
SECTION

02

VALUE-BASED ANTI-CORRUPTION EDUCATION & MARKETING

2.1 General Advocacy & Interactive Sessions

2.2 Behavioral Change Programs

2.3 Ethics and Integrity Training

2.1 GENERAL ADVOCACY AND INTERACTIVE SESSIONS

182
Sessions

121
Gewogs across 11 Dzongkhags

155
Schools, Institutes, & Agencies

22,922
Participants

Anti-corruption education remains central to cultivating a culture of integrity anchored in Bhutan's national values. It serves as both a preventive safeguard and a transformative tool to instill ethical consciousness across society, with particular emphasis on youth and other vulnerable groups who are critical to shaping long-term behavioral change.

In the reporting year, the ACC sustained its commitment to advocacy and public awareness by strategically targeting sectors most vulnerable to corruption and addressing emerging needs. A multi-pronged approach was adopted, comprising advocacy campaigns, interactive engagements, thematic trainings, and sustained behavioral change programs. These initiatives were delivered through both in-person and digital platforms to ensure wider accessibility and impact.

General advocacy continued to function as a vital platform for citizen empowerment. Through its Regional Offices in Bumthang, Phuntsholing, and Trashigang, the ACC conducted 145 general advocacy sessions in 121 Gewogs across 11 Dzongkhags, bringing the cumulative coverage to 155 Gewogs under the third round of general advocacy. A total of 14,933 participants were engaged, reinforcing the foundations of an informed and responsible citizenry.

Alongside this, the ACC carried out 37 interactive sessions with 7,989 participants from ministries, public agencies, schools, colleges, private sector organizations, and marginalized communities. These sessions were designed not only to raise awareness but also to embed anti-corruption values in institutions and individuals through dialogue, reflection, and collective learning.

Table 2.1: Details of participants covered during the general advocacy & interactive sessions

SN	Number of sessions	Number of participants	Target Audience	Institutions Covered
1	**Ministry and Agencies**			
	4	150	Mining Inspectors, Immigration Inspectors, Prosecutors, and Attorneys	Department of Geology and Mines, Ministry of Energy and Natural Resources Department of Immigration, Ministry of Home Affairs Office of the Attorney General
2	**Tertiary and School Levels**			
	27	7426	Students, Scouts, Pre-Service Trainees, Vocational Trainees, Teachers, and Lecturers	**Colleges and Institute:** • College of Zorig Chusum • Gedu College of Business Studies • Gyalpozhing College of Information Technology • Institute of Science of Mind (ISM) • Jigme Wangchuck Power Training Institute • Royal Institute of Management • Rural Development Training Center • Technical Training Institutes (Chumey and Samthang) • Sherubtse College • Ugyen Wangchuck Institute for Forestry Research and Training • Youth Peer Education Network (Y-PEER) during 22nd National Training of Trainers (ToT) **Schools and Scout Groups:** • Bitekha Middle Secondary School • Central Schools (Bjishong, Chhukha, Gongzim Ugyen Dorji, Phobjikha, Radhi, Sarpang, Tshangkha, and Tsenkharla) • Higher Secondary Schools (Dashiding, Jakar, Karmaling, Samtse, and Zhemgang) • Scouts Leadership Training (Class IX)
4	**Corporations, Civil Society Organizations, Private, and Marginalized Communities**			
	6	413	Corporate Employees, Contractors, and Marginalized groups	Druk PNB Bank Limited (DPNBL) Private Early Childhood Care and Development (ECCD) Contractors Pride Bhutan

5	Gewogs			
	145	14,933	General Public	Gewogs of 11 Dzongkhags (Chhukha, Dagana, Gasa, Haa, Mongar, Punakha, Samdrup Jongkhar, Trashigang, Tsirang, Wangdue Phodrang, and Zhemgang Dzongkhags).

Over the past five years, a total of 43,197 participants from various audience groups have been engaged in the general anti-corruption education (335). Notably, the highest outreach was recorded this year, with a total of 22,922 participants, the majority of whom were citizens.

- ## National Anti-Corruption Day

Bhutan observed the 2nd National Anti-Corruption Day (NACD) on 21 February 2025, coinciding with the Birth Anniversary of His Majesty The King. The observance reaffirmed the nation's enduring commitment to the fight against corruption while paying tribute to the exemplary integrity and moral leadership of His Majesty and the revered monarchs.

In alignment with the global theme for International Anti-Corruption Day (9 December), the theme for this year's NACD was "*Empowering Bhutanese Youth to Champion Integrity: Building a Corruption-free Bhutan*". The theme underscored the pivotal role of young people in advancing the integrity agenda and sustaining Bhutan's long-term vision of good governance.

The commemoration of NACD extended beyond a single day, evolving into a sustained, year-long initiative. Extensive pre-programs – particularly focused on youth engagement helped build momentum leading up to the main event, while follow-up activities reinforced its messages, as detailed in **Table 2.2**.

Commemorating the 2ⁿᵈ National Anti-Corruption Day in Honor of His Majesty The King's 45ᵗʰ Birth Anniversary

Table 2.2: Build-up programs conducted as part of the 2nd NACD culmination activities

SN	Program
1	Launch of Evaluation report of DAMTSI Activity book
2	Collaboration with school children on the Anti-Corruption theme song
3	Interactive sessions with: • Integrity Club schools • Scouts during Scouts leadership program • Private ECCDs • Marginalized communities (Pride Bhutan) • Incumbent and aspiring contractors • New recruits of DPNBL • Youth in the FIT • Students of GCIT • Mining inspectors, DGM • New recruits of DGM
4	ToT for: • Scout Secretaries on DAMTSI activities • Representatives of TTIs
5	Workshop with Integrity Club Coordinators
6	Comic strip competition
7	Panel discussion on Youth Integrity by Youth representatives
8	Public service marathon in all regional offices
9	Media releases (messages from the CP, YIP)
10	Visit to 15 schools with IC and 8 tertiary Institutes (6,310 students and trainees)
11	Panel discussion with ISM

● **Media and Innovation Lab**

The ACC continues to optimize the Media and Innovation Lab to strengthen media engagement and expand its outreach across diverse audiences. During the year, a public service announcement on the OIP was developed and disseminated, providing clear insights into its objectives, core elements, and practical applications. Through the Lab's multimedia platforms, the ACC continues to strive to deliver creative and engaging content, thereby enhancing public understanding, promoting dialogue, and reinforcing the culture of integrity across society.

2.2 BEHAVIORAL CHANGE PROGRAMS

Recognizing that nearly half of Bhutan's population comprises young people (NSB, 2011), the ACC regards youth as both change agents and strategic partners in advancing the integrity agenda. To this end, the Youth Integrity Program (YIP) was launched in 2020 under the banner **DAMTSI**. The program seeks to proactively engage children and youth to foster long-term behavioural change critical for nurturing a generation ingrained with integrity. These initiatives are carried out across multiple levels of education and engagement, extending from early childhood through to higher education and beyond. The following sections present these initiatives in detail.

● Early Childhood (Age 2-5)

The ACC continued to promote a value-based education initiative integrated into Bhutan's ECCD framework in collaboration with the ECCD & Special Education Needs Division of the Ministry of Education and Skills Development (MoESD) since 2021. Targeting children aged 2-5, the **DAMTSI Activity Book** aims to instill values of honesty, responsibility, and fairness through structured classroom activities and parental engagement.

In the reporting year, the ACC conducted an extensive evaluation on the implementation of DAMTSI Activity Book. A mixed-methods approach was adopted, collecting quantitative data from 613 ECCD facilitators, 627 pre-primary teachers, and 385 parents across 399 ECCD centers nationwide. Qualitative insights were gathered from interviews with 24 Education Officers, 24 Principals, and a consultation with Bhutan Early Childhood Education and Development Association (BECEDA).

Key Findings

- Higher level of awareness and uptake, with 92% of centers and 85% of facilitators familiar with DAMTSI Activity Book, and 90% reporting active implementation.

- Positive behavioral outcomes were observed in children, particularly in honesty, responsibility, and fairness.

- Parental involvement varied across districts, with lower engagement in urban areas.

- The DAMTSI Activity Book was found effective but requires refinement for age-appropriateness and inclusivity.

- 22% of facilitators remain untrained, with disparities between public and private centers.

- Limited integration of DAMTSI indicators into the ECCD quality monitoring system.

– Inconsistent national directives and uneven resource availability.

Recommendations

– Issue a national directive for uniform implementation.

– Integrate DAMTSI Activity Book into ECCD diploma and degree programs.

– Institutionalize regular in-service and refresher training.

– Strengthen parental outreach and embed DAMTSI indicators into ECCD quality monitoring system.

– Develop centralized resource hubs, including digital content.

– Enhance collaboration with BECEDA and local authorities.

- ## Children and Youth from Class PP to XII (Age 5-18)

As part of the behavioural change program, the ACC places strong emphasis on school-going children and adolescents to ensure that values of integrity are nurtured throughout the formative years. Two major initiatives under this category are the *DAMTSI Handbook for Scouts* and the *Integrity Clubs*.

– **DAMTSI Handbook for Scouts:** In collaboration with the MoESD, the ACC developed the DAMTSI Handbook for Scouts to complement the national scouting program and embed core moral values among school children. Implemented in schools across the country through trained adult scout leaders, the handbook has now been formally integrated under the *"National Education"* theme of the scouting training manual, a specialized and compulsory manual for students of classes V, VII, and IX. Selected activities from the DAMTSI handbook have been adapted and embedded level-wise for classes V, VII, and IX, while the remaining activities continue under the general scouting program.

Upon completion of the Class IX specialized and compulsory scouting program, the top-performing scouts will be allowed to participate in the Scouts' Leadership Program. During this advanced stage, scouts will be assessed not only on their leadership abilities but

also on their ethical conduct. As a gesture of recognition and encouragement, the top 10 scouts from this leadership program are awarded the *DAMTSI Badge*, symbolizing their commitment to integrity, moral responsibility, and exemplary conduct. This initiative aims to nurture a generation of young leaders who embody the spirit of DAMTSI, honoring duty, accountability, and service with integrity.

– **Integrity Clubs**: Integrity clubs were initiated to promote ethical values and foster a sense of responsibility among the youth in schools and local communities. Till now, 21 Integrity Clubs have been established across all 20 Dzongkhags. These clubs serve as vital platforms for fostering a culture of good governance in schools through active student engagement in promoting integrity, accountability, and transparency. While the number of clubs were limited, the program expanded through a whole-of-school approach

with inclusion and active engagement of the Principals and District Education Officers and existing club coordinators to take up outreach programs in nearby sister-schools. This is also very much in line with the changes in the education sector – piloting of the Cambridge system.

Considering that the turnover and transfer of certain Club Coordinators have posed challenges in ensuring continued success of the club, a capacity development workshop was organized for all 21 club coordinators in the reporting year towards reinvigorating the vibrancy of the club's activities. The workshop focused on training and supporting coordinators in developing school-specific action plans, tailored to their contexts and operational convenience.

The workshop also included a review of the Integrity Club Guideline which was initially developed in 2017. Based on the feedback received during the review, the guideline was revised and accordingly shared with the coordinators. The Guideline is expected to provide clear direction and consistency in the club's functions.

- ## Youth in the Tertiary Institutions (Age 18-24)

At the tertiary level, the ACC collaborates with academic institutions to embed integrity, ethics, and professionalism into higher education, ensuring that young people entering the workforce are equipped with the values necessary for ethical leadership and service. Two major initiatives under this category are the *leadership courses* in the colleges and the *modular curriculum* for Technical Training Institutes (TTIs).

- **Leadership Course at the College of Natural Resources (CNR)**: Recognizing that corruption undermines the effective management and conservation of natural resources, the ACC, in collaboration with CNR, rolled out a leadership course on integrity, accountability, and transparency during the reporting year.

- **Modular Curriculum on Ethics, Integrity, and Professionalism for TTIs**: In the reporting year, the ACC conducted a refresher course for representatives of the TTIs, building on earlier training. A comprehensive lesson plan was also developed to support effective implementation of the modular curriculum, aimed at instilling ethics, integrity, and professionalism into the daily personal and professional lives of trainees. The module, developed in collaboration with the erstwhile Ministry of Labour and Human Resources (MoLHR), will be rolled out in the upcoming academic session.

- ## Youth not in Education, Employment or Training

To ensure a holistic approach to youth engagement in integrity promotion activities, the ACC partnered with the Department of Education Programs (DEP), MoESD, to develop a training manual for Not in Education, Employment or Training (NEET) youth in the FY 2023-2024. Towards ascertaining impactful implementation of the training manual, a two-day training of trainers (ToT) was conducted in the reporting year in collaboration with the Programs and Youth Coordination Division (PYCD) under DEP. The ToT emphasized on exploring real-world challenges, repercussions of value decadence, and significance of positive role models.

Following the ToT, youth centers across Bhutan began implementing training sessions reflecting the commitment in promoting moral and ethical individuals. Concurrently, the ACC and the PYCD, in its commitment to monitoring the program's impact, partnered with the Paro and Phuentsholing Youth Centers to deliver joint training sessions.

Building awakened citizenry through

Advocacy

& interactive sessions

2.3 ETHICS AND INTEGRITY TRAINING

● **In-person Training**

Building on the success of the earlier in-person profession specific tailored thematic training, the ACC continued to deliver similar training to vulnerable professions. In the reporting period, the ACC facilitated similar training for officials of Department of Revenue and Customs (DRC), Department of Forest and Park Services (DoFPS), Desuups undergoing cultural tour guide courses, and Financial Service Providers. A total of 28 trainings were conducted engaging 1015 participants as shown in **Table 2.3**.

Table 2.3: Details of In-Person Training Conducted

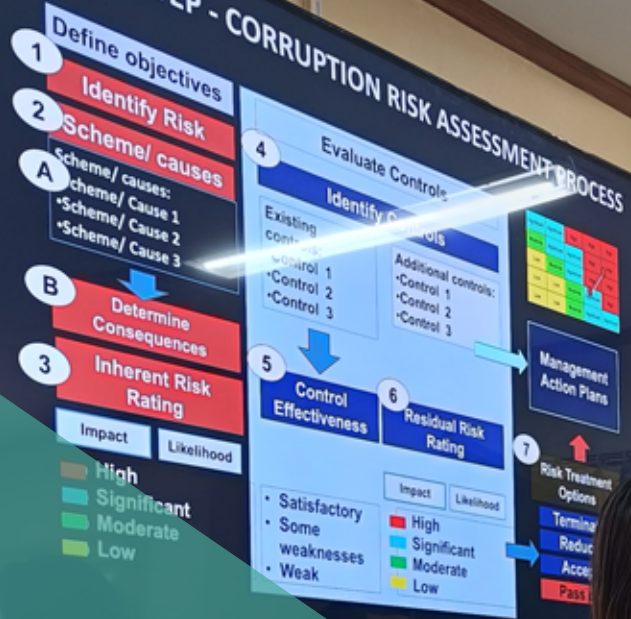| SN	Target Officials	No. of Participants	Agency Coverage	Vulnerability Assessment
1	Customs Officials	304	08 Regional Revenue and Customs Offices (RRCO)	• Inherent corruption risks in revenue administration.
2	Forestry Officials	393	Range Officers from all 20 Dzongkhags	• Highly vulnerable sector as per NIA 2022 and Corruption Vulnerability Assessment conducted in 2023.
3	De-suups	276	De-suups undergoing Cultural Tour Guide Training	• Proactive initiative of the De-suung Office. • Integrity concerns from Monument Fees scandal.
4	Financial Service providers	42	Bank of Bhutan Limited, T Bank Limited, Bhutan Insurance Limited	• Recurring corruption in the sector with three more corruption reports qualifying for investigation in the reporting year. • National Corruption Barometer Survey (NCBS) 2023: 61.9% respondents perceive banking services as prone to corruption

● **Online Training**

As reported in the past Annual Reports, the ACC has rolled out e-learning courses catering to a wide range of target groups such as civil servants, parliamentarians, corporate employees, and judges. Such self-paced e-learning courses have proven to be cost-effective while providing an opportunity for any interested individuals to advance their awareness on ethical practices. Since its inception, over 6,000 public servants have completed the course reflecting the success of the platform in imparting ethical education.

In the reporting period, a total of 1,459 public servants were enrolled for these courses, including P2 officials who are eligible for promotion, corporate employees, judges and justices, participants in the FIT program, and those who enrolled through the proactive initiatives of the agencies such as RRCO and MoESD.

SECTION

03

EMBEDDING INNOVATIVE, FORESIGHT, AND TECHNOLOGY DRIVEN CORRUPTION PREVENTION MEASURES

3.1   Public Sector Integrity
3.2   Private Sector Integrity
3.3   CSO and Media Integrity

3.1 PUBLIC SECTOR INTEGRITY .

a) Agency Integrity Maturity Score: A holistic approach to determining maturity of integrity of agencies

The Agency Integrity Maturity Score (AIMS) is the ACC's new framework for assessing the integrity of public agencies, evolving from the earlier OIP that was implemented under the National Integrity and Anti-Corruption Strategy (2019-2023). While the OIP provided uniform mandatory indicators for agencies to adopt preventive tools, its annual indicator-based assessments had limitations in capturing systemic vulnerabilities.

AIMS addresses this gap by offering a more comprehensive and risk-aligned approach that combines integrity promotion efforts and corruption occurrence into a single maturity score ranging from **1** to **100**. Agencies scoring **≥80** are considered to have a **strong integrity culture**, those between **50-79** a **moderate culture**, and those scoring **≤49 weak systems** requiring improvement.

The framework is anchored on 10 indicators, grouped under two dimensions as shown in the **Table 3.1**.

Table 3.1: Detailed indicators under each dimension

Integrity Promotion	Corruption Occurrence
1. OIP implementation rate	1. Staff implicated
2. Corruption Control System Index (NIA)	2. Staff convicted
3. Staff training and awareness	3. Complaints received
4. Completion of e-learning modules	4. Administrative actions
5. Asset Declaration compliance	5. Action Taken Reports Backlog

For every occurrence of corruption, points are deducted from the Integrity Promotion score, with the final maturity score reflecting the balance between preventive efforts and actual lapses. This ensures that no matter how many preventive initiatives an agency undertakes, actual corruption occurrences will directly diminish its integrity score. The ultimate goal of AIMS is to strengthen institutional accountability and reinforce the national stance of *Zero Tolerance against Corruption*.

AIMS is designed not as a punitive tool but as a diagnostic mechanism to help agencies identify systemic weaknesses, encourage proactive prevention, support evidence-based planning, and provide the Government with a standardized integrity benchmark for performance monitoring. It also

reinforces the importance of sustained agency leadership in promoting integrity and strengthening internal controls.

From FY 2025-2026, AIMS will be mandatory for all budgetary agencies. From FY 2026-2027 onwards, agency-specific maturity scores will be generated and published, providing a comparative benchmark of integrity performance across the public sector.

b) Proactive and Reactive System Studies

Proactive and reactive system studies are central tools through which the ACC diagnoses systemic corruption risks, evaluates institutional practices, and recommends reforms to enhance integrity across vulnerable sectors. In the reporting year, the ACC conducted one proactive system study and reviewed implementation of earlier studies.

- **System Study on Bhutan's Tourism Sector:** Tourism remains a driver of Bhutan's economy, contributing significantly to the national Gross Domestic Product (GDP). Under the Economic Stimulus Program, the sector was allocated 16% of the total budget, with ambitious goals of increasing tourist arrivals to 150,000 by 2024 and 300,000 by the end of the 13th Five-Year Plan (FYP). Given its importance, the sector must operate with the highest levels of integrity. Following the 2023 Corruption Vulnerability Assessment of Public Services, the ACC conducted proactive system study to assess potential corruption risks and systemic gaps in the tourism industry. A summary of key findings and corresponding recommendations are presented in **Table 3.2**.

Table 3.2: Key findings and recommendations on Bhutan's Tourism Sector

Key Findings	Recommendations
1. Lack of system integration among key agencies (Department of Immigration (DoI), Department of Tourism (DoT), and Department of Revenue and Customs (DRC)) 2. Bribery and favoritism risks in licensing and certification 3. Risks of SDF and tax evasion, and embezzlement 4. Operational integrity issues with tourism service providers 5. Weak monitoring and enforcement 6. Favoritism in tourism development and marketing	• Enhance inter-agency system integration and digitization • Increase transparency and accountability • Implement stricter monitoring and automated verification systems • Implement robust operational standards • Strengthen enforcement and inter-agency collaboration • Promote inclusive governance and community participation, including CSOs

- **Timber Extraction and Export (Scientific Thinning)**: All 13 recommendations were fully implemented, resulting into the introduction of Timber Export Guidelines and a Private Sector Engagement Modality thereby enhancing transparency in timber operations.

- **Bailey Bridge Construction:** The Department of Surface Transport (DoST), Dzongkhag Engineering Sectors, and the Bhutan Construction and Transport Authority (BCTA) achieved 80% implementation, with seven recommendations fully adopted, two partially implemented, and one pending. Key reforms include new guidelines for bridge launching and standardization of bidding qualifications, with follow-up monitoring scheduled.

- **Corrupt Practices in Bank Lending:** The Royal Monetary Authority (RMA) and financial institutions implemented 93.24% of the 37 recommendations. While 32 recommendations were fully addressed, five remain partially implemented due to the long-term nature of systemic reforms. However, the ACC will continue to rigorously monitor the implementation.

c) Prevention Advisory: Integrity Framework in Sports

In response to rising concerns of match-fixing in Bhutanese football, the ACC collaborated with the Bhutan Football Federation (BFF) to develop an integrity framework aligned with FIFA standards but adapted to Bhutan's context. The framework recommends measures such as a developing national Code of Ethics, mandatory disclosure of sponsorship details, whistleblower guidelines, vetting of international players and coaches, minimum salary regulations, standardized player contracts, enhanced match monitoring and technical surveillance, stronger oversight of financial transactions, and targeted integrity training and awareness programs. By institutionalizing these reforms, the ACC aims to prevent unethical practices, strengthen governance, and deter match manipulation and corruption in the sports.

d) Corruption Risk Management

Corruption Risk Management (CRM) continues to serve as one of the important preventive strategies of the ACC, enabling organizations to identify and mitigate risks before they escalate into serious misconduct. Based on internationally recognized frameworks such as COSO Enterprise Risk Management Framework and ISO 31000:2009 Risk Management Principles, CRM empowers institutions through participatory and self-assessment processes. In the reporting year, CRM exercises were carried out at the Bhutan Broadcasting Service Corporation Limited (BBSCL) and the RRCO in Gelephu.

- **BBSCL**: A two-day CRM workshop involving 28 staff generated key recommendations, including the introduction of a cooling-off period for politically active applicants, board-level endorsement of editorial guidelines, formal gift declarations, conflict-of-interest declarations, competency-based HR frameworks, stronger program classification, standardized timelines for meeting minutes and decisions, and regular ethics training. These reforms, to be monitored through the OIP, are expected to set new benchmarks for integrity within the media sector.

- **RRCO, Gelephu**: A proactive CRM with 22 inspectors produced a risk profile and mitigation plan covering capacity building, integrity compliance, trade facilitation, operational efficiency, and coordination. Recommendations included refresher trainings for customs officials and clearing agents, mandatory conflict-of-interest declarations, whistleblower protection, revenue and post-clearance audits, development of SOPs, quarterly reviews, staff rotation, promotion of online payments, and improved data monitoring using digital tools. These recommendations are to be replicated across all RRCOs, with implementation monitored by the DRC, reinforcing the ACC's commitment to systemic and localized corruption prevention.

e) Asset Declaration and Management

Asset Declaration (AD) stands as a key safeguard for integrity in governance, fostering transparency and accountability while deterring illicit enrichment and conflicts of interest. Since its inception, the ACC has been administering the Asset Declaration of all the public servants.

- **Compliance:** The asset declaration compliance rate for 2025 reached an impressive

99.80%, with 99.24% compliance among Schedule I officials managed by the ACC and 99.81% among Schedule II officials overseen by their respective agencies. In total, 26,189 public officials were required to declare their assets, income, and liabilities, categorized into Schedule I and Schedule II based on vulnerability levels as shown in **Table 3.3**.

Table 3.3: AD Compliance for the Reporting Year 2025

Declarant Category	Total Covered Persons	Late/ non-declarants	Compliance Rate (%)
Schedule I	663	5	99.24
Schedule II	25,526	46	99.81
Total	26,189	51	99.80

● **Enforcement**: The asset declaration system continues to demonstrate its effectiveness as a preventive tool against illicit enrichment. In 2024, late and non-declarations dropped sharply compared to the previous year, with full compliance achieved among senior officials (Schedule I) as depicted in the **Table 3.4**. Unlike in 2023, where 931 officials declared late and 602 failed to declare, the numbers in 2024 reduced drastically, with only 84 late declarants and five non-declarants. This improvement reflects growing awareness across the public service and the deterrent effect of penalties, signaling that the system is maturing and no longer reliant solely on administrative enforcement.

Table 3.4: Action Taken on Late and Non-Declaration of AD for the Reporting Year 2024

ActionTaken	Late Declarants		Non-Declarants	
	Schedule I	Schedule II	Schedule I	Schedule II
Penalty Imposed	0	77	0	2
Penalty Waived	0	7	0	3
Total	0	84	0	5

- **Verification**: Beyond compliance, the ACC carried out verification of 1,906 asset declarations, representing 7.28% of the 26,189 total declarants, across 12 high-risk sectors including executive services, agriculture, livestock, forestry, banking, hydro-energy, trade, engineering, health, land, tourism, and sports. Guided by potential disproportionate assets cases flagged by the system, complaints data, and scoping study findings, the exercise identified 42 potential disproportionate asset cases for ongoing monitoring. Among these, one case was referred as supplementary information for an ongoing case. In addition, four cases were shared for intelligence gathering, and seven conflict-of-interest cases referred to relevant agencies and the declarants concerned for proactive management. This demonstrates that asset declarations are not a box-ticking exercise but an active safeguard for public integrity, providing assurance that corruption risks in critical sectors such as land, banking, hydro-energy, and tourism are being closely monitored.

f) Conflicts of Interest Declaration and Management

Conflict of interest (CoI) management remains one of the most critical preventive tools for safeguarding integrity in the public sector. The effectiveness of this tool is closely linked with the proper use of the Asset Declaration System (ADS), which not only captures assets, incomes, and liabilities but also provides early warning signals on potential risks. This demonstrates that AD is not merely a compliance exercise but a vital mechanism for risk detection, and agencies must actively utilize it to strengthen their internal controls.

During the reporting year, a total of **165 additional employment** declarations were submitted (26 under Schedule I and 139 under Schedule II), the majority falling under diverse external engagements such as consultancy, advisory roles, freelance work, and executive positions. Similarly, **101 post-employment** plans were declared (2 from Schedule I and 99 from Schedule II), with most indicating a shift into commercial activities, heightening the risk of '*revolving door*' practices. Declarations also revealed extensive shareholding patterns, with over 2.141 million shares reported across financial institutions and companies, concentrated in sectors such as banking, cement, insurance, and emerging industries. Such concentrations become particularly sensitive when they overlap with officials' regulatory, procurement, or licensing responsibilities, creating clear risks of CoI, bias, and preferential treatment.

These disclosures highlight the urgency for agencies to move

beyond passive collection of declarations and adopt active, sector-specific CoI management to safeguard integrity and prevent the misuse of public office for private gain.

g) Integrity Vetting

As a preventive measure, Integrity Vetting System (IVS) has become critical in shaping organizational culture by ensuring that only individuals with proven compliance and integrity are recruited, promoted, or appointed to positions of responsibility, thereby reinforcing a culture of meritocracy and accountability. During the FY 2024-2025, **6,915 Integrity Vetting Reports** (IVR) were generated with an overall TAT of 1.5 working days, an improvement from the previous year of 1.7 working days.

- **IVR Category:** Of the total 6,915 IVRs generated, 6,901 were categorized as "No Records" indicating no adverse findings, while 14 individuals were implicated across three categories: eight in "Provisional Record", five in "Record", and one in "Adverse Record".

- **Implicated Officials:** Of the 14 individuals implicated, five were from Dzongkhag Administration, three from *Financial Institution*, two each from *Ministry, Armed Force,* and *Autonomous Agency.* An individual categorized as

"Adverse Record" from one of the autonomous agencies was not granted promotion, demonstrating the IVR's critical role in ensuring that only personnel with consistent compliance and integrity are advanced.

- **IVR generated by Purpose:** From the total of 6,915 IVRs generated, the majority of the requests were for the *Recruitment* (3,538), followed by *Promotion* (2,217) and *contract renewal* (441) and *appointment* (294). This underscores the IVR's pivotal role as a frontline mechanism for handling processes that directly shape organizational capability, talent retention, and career progression pathways.

- **IVR generated by Agency:** The highest number of IVR requests were received from Dzongkhag Administration (2,246), Corporation (1,686), and Autonomous Agency (1,314). In contrary, Judiciary submitted the fewest requests, with only three applications.

The data demonstrates that the IVS has matured into a frontline integrity safeguard that is both efficient and effective. Going forward, it is critical for agencies with low utilization of the system, to mainstream IVR checks into their HR processes. Expanding the consistent use of IVS across all agencies will not only deter potential malpractice but also institutionalize a merit-based and integrity-driven public service culture.

3.2 PRIVATE SECTOR INTEGRITY

Recognizing the private sector's pivotal role in driving Bhutan's economic growth and ensuring fair competition, the ACC regards businesses as strategic partners in advancing the national integrity agenda. To this end, all business integrity initiatives are now pursued under the banner **DAMTSI-BIZ:** *Developing Accountable, Moral, Trustworthy, and Successful Individuals and Businesses*, a comprehensive program designed to embed anti-corruption standards and ethical practices across industries. By blending international best practices with Bhutanese values, DAMTSI-BIZ seeks to foster a business environment that is trustworthy, competitive, and anchored in innovation and sustainability.

- **DAMTSI-BIZ**: The Business Integrity Strategy is being restructured and rebranded as *DAMTSI-BIZ* to align with Bhutan's evolving development priorities and international best practices. Developed in collaboration with the World Bank, Center for International Private Enterprise (CIPE), and Basel Institute on Governance (BIG), the new framework will provide businesses with practical tools for compliance, governance, and internal integrity systems. Its core features include:

    - DAMTSI Certification as a milestone for firms aspiring to qualify for ISO 37001 Anti-Bribery Management System and related international standards, while embedding Bhutan's values of integrity, happiness, and sustainability into business practices.

    - Beneficial Ownership Transparency through a central registry to prevent misuse of corporate structures, tax evasion, and hidden conflicts of interest.

    - Voluntary Disclosure as a mitigating factor, incentivizing businesses to self-report corruption risks.

    - Standard Due Diligence by aligning with Multilateral Development Bank (MDB) protocols to debar entities sanctioned in other jurisdictions, while introducing a standardized due diligence checklist for procurement, Foreign Direct Investments (FDI), Public-Private Partnerships (PPP), and fiscal incentives.

    - Whistleblower Protection through a unified framework to safeguard employees from retaliation and build trust.

    - Balanced Incentives and Sanctions by linking integrity to tax incentives, procurement advantages, and recognition awards for compliant firms, coupled with strong penalties and debarment for violations.

- **Partnership with the Construction Sector**: Given the construction industry's high exposure to corruption risks, the ACC signed an MoU with the Construction Association of Bhutan (CAB) in August 2024. In partnership with CAB and the BCTA, capacity-building workshops and sensitization sessions were delivered to contractors between August and December 2024. These focused on procurement risks, ethical responsibilities, and strengthening organizational integrity. The initiative represents a significant step in embedding integrity standards into one of Bhutan's most vulnerable industries.

3.3 CSO AND MEDIA INTEGRITY

CSOs and media remain vital to Bhutan's democratic and developmental landscape, playing a critical role in civic engagement and third-party accountability. To ensure their effectiveness, the ACC continues to work with CSOs and media to promote internal controls and position them as trustworthy and capable institutions in enhancing checks and balances within the governance ecosystem.

- **Bhutan CSO Accountability Standards (BCAS):** During the reporting year, the CSO Authority (CSOA) assessed 54 registered CSOs against 25 accountability indicators across four domains: *Open Organization, Well-handled Resource, Responsive Decision-making, and Responsive Leadership.* The overall implementation score stood at **49%**, with *"Open Organization"* scoring the highest at **58.07%** as shown in **Figure 3.1.** However, this represents a decline of 26.60% compared to the previous year, primarily due to 12 CSOs failing to submit required documentation despite multiple reminders. These organizations received a score of zero, significantly affecting the overall average. Moving forward, the ACC and CSOA will target low-performing CSOs with focused interventions, particularly on integrity-related aspects of BCAS. Strengthening accountability within the CSO sector is essential to ensuring that these organizations continue to serve as credible, trusted, and responsible actors in the country's governance and development processes.
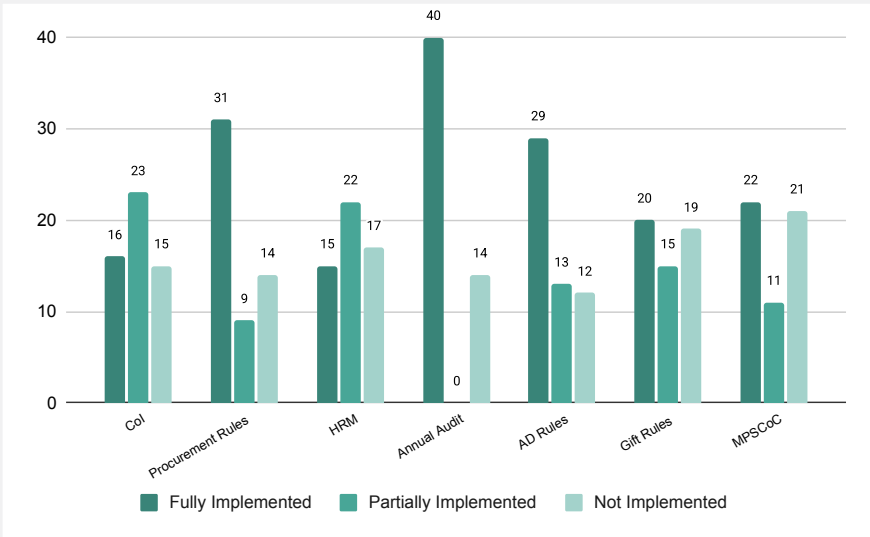

Figure 3.1: Open Organization implementation status

- ***Vulnerabilities Assessment in the Media:*** In the reporting year, the ACC also conducted a sectoral assessment of Bhutan's media institutions. Between 2019 and 2024, 13 complaints were received against media entities, largely concerning abuse of HR processes, embezzlement, and unethical practices. While these cases do not signify widespread corruption, they underscore potential risks that could undermine media integrity if left unchecked. Key risks identified include external pressure leading to biased reporting, unethical practices in paid content, risks of bribery among journalists, abuse of authority in recruitment, and the absence of CoI declaration systems.

  To this, the assessment recommended measures such as adopting robust editorial guidelines, mandating disclosure of all paid content, establishing gift declaration protocols, and instituting CoI declarations for editorial and administrative staff. The study further highlighted the need for competency-based training for journalists, moving beyond ad hoc short courses, and strict adherence to SOPs in public information sharing. Addressing these risks is vital for reinforcing public trust and preserving the media's role as a cornerstone of Bhutan's national integrity system.

SECTION
04

PROACTIVE, INTELLIGENCE & TECHNOLOGY-BASED CORRUPTION DETERRENCE

4.1   Corruption Report and Referrals

4.2   Investigation and its Outcome

4.1 CORRUPTION REPORT AND REFERRALS

During the FY 2024-2025, the ACC received a total of **364** corruption reports, averaging 30.3 per month which is an increase from previous year's monthly average of 26.8.

a) Corruption Reports by Mode

Out of the 364 corruption reports received in the reporting year, the data reveals that the *Website* is the most utilized channel for reporting corruption, accounting for **166** reports as depicted in **Figure 4.1**. This is followed by *Walk-in* reports with 100 corruption reports, indicating enhanced trust in the ACC. Whereas, *My ACC App* and *Telephone* were the least used, with 12 (3.30%) and seven (1.90%) reports respectively, indicating either limited awareness or usability issues with these modes. Overall, digital platforms dominate, but traditional methods remain relevant for a notable portion of the population. Against the total corruption reports, **37** were from proactive intelligence, off shoot cases, and other proactive interventions.

364
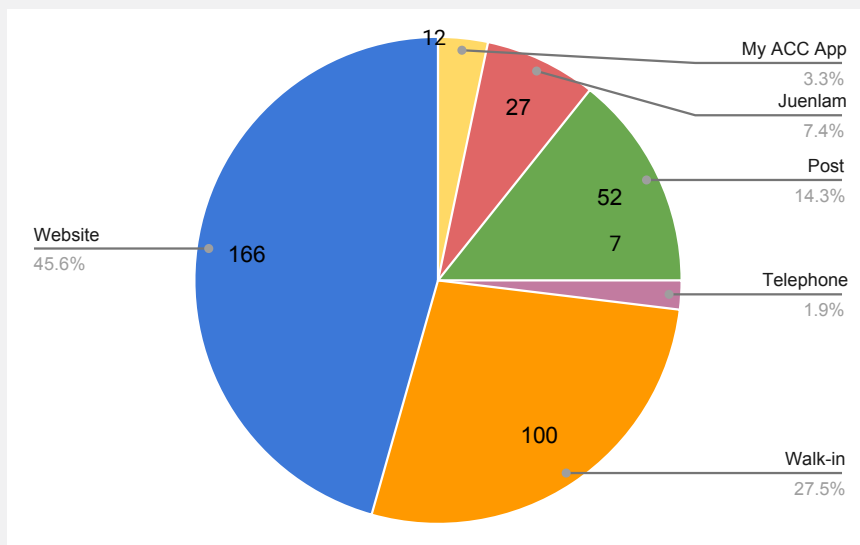Total corruptions reports

30.3
Average per month

Figure 4.1: Corruption reports by mode

b) Corruption Reports by Source

Out of the 364 corruption reports recorded, **204** (56%) were from *Known Sources* and **160** (44%) were submitted *Anonymously* as shown in **Figure 4.2**. The fact that a majority of complainants disclosed their identities suggests a growing level of confidence in the reporting mechanism and trust in how cases are handled. At the same time, the significant proportion of anonymous submissions reflects continuing concerns about personal safety, fear of retaliation, or limited assurance in whistleblower protection. This near-balanced distribution highlights two critical needs:

i)   maintaining robust channels that guarantee confidentiality and anonymity,

ii)   strengthening protections and outreach to encourage more individuals to come forward openly.
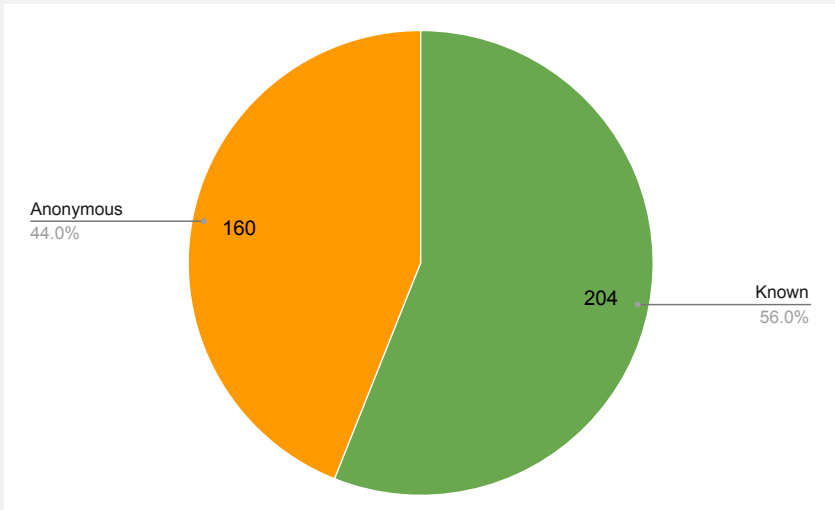
Figure 4.2: Source of Corruption Reports

Among the 204 reports received from *Known Sources*, a significant gender disparity was observed. Of these, **167** reports (88.5%) were submitted by *Men*, while only **18** reports (11.5%) came from *Women*, including three submitted collectively by community groups. This imbalance suggests structural barriers that may be limiting women's participation in reporting corruption, including unequal access to reporting channels, differing societal roles, and heightened concerns over safety or retaliation. Addressing this gap will require more gender-sensitive outreach and protection measures to ensure that women can report corruption on equal footing. In addition, **16** *referrals* were received from various agencies as shown in **Table 4.1**.

Table 4.1: Number of Referrals by Agencies

SN	Agency	No. of Corruption Reports
	Number of referrals by agencies	
1	Bhutan Development Bank Ltd.	3
2	Bhutan National Bank Ltd.	2
3	Department of Law & Order, Ministry of Home Affairs	1
4	Ministry of Finance	1
5	Paro Dzongkhag	1
6	Royal Audit Authority	4
7	Royal Bhutan Police	1
8	Samtse Dzongkhag	1
9	State Trading Corporation of Bhutan Ltd.	2

c) Corruption Reports by Decisions Taken

In the reporting period, out of 364 corruption reports received, **196** were *closed with no further action*. Of the remaining 168, 29 were referred to agencies for administrative action, 73 for sensitization, nine were upgraded for administrative inquiry, 18 for information enrichment, and 39 for investigation as illustrated in **Figure 4.3.**
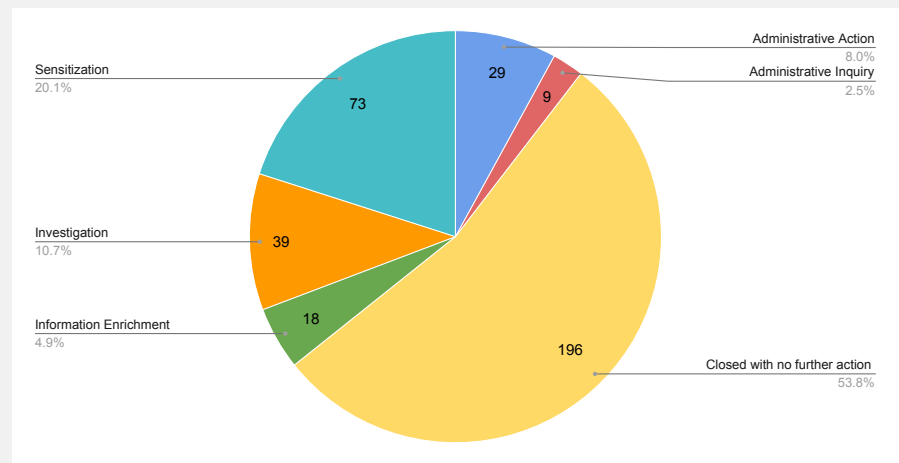

Table 4.3: Decision on corruption reports

Similar to previous year, all the corruption reports qualified for investigation originated from *Known Sources*, as shown in **Table 4.2.**

Mode of Corruption Reports	Total no. of Corruption Reports	Qualified for investigation				Qualified for Administrative Inquiry				Shared for Action				Shared for Sensitization				Information Enrichment				Closed with no further Action				Total			
		Male	Female	Agency/Community Referral	Anonymous	Male	Female	Agency/Community referral	Anonymous	Male	Female	Agency/community Referral	Anonymous	Male	Female	Agency/community Referral	Anonymous	Male	Female	Agency/community Referral	Anonymous	Male	Female	Agency/community Referral	Anonymous	Male	Female	Agency/community Referral	Anonymous
Post	52	0	0	8	0	0	0	0	1	0	0	1	2	2	0	2	13	0	1	0	3	4	1	4	10	6	2	15	29
Walk-in	100	28	0	1	0	3	0	0	0	7	1	0	0	6	0	0	0	3	0	0	0	40	11	0	0	87	12	1	0
Website	166	2	0	0	0	1	0	1	2	4	1	0	8	13	2	0	22	2	0	0	7	21	1	1	78	43	4	2	117
Juenlam ACC	27	0	0	0	0	1	0	0	0	4	0	0	0	7	0	0	0	1	0	0	1	8	0	1	4	21	0	1	5
My ACC App	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	3	0	0	4	3	0	0	9
Telephone	7	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0	0	0	5	0	0	0	7	0	0	0
Total	364	30	0	9	0	5	0	1	3	16	2	1	10	29	2	2	40	6	1	0	11	81	13	6	96	167	18	19	160

Subtotals (Known / Anonymous): Qualified for investigation — 39 known, 0 anonymous; subtotal 39 (10.71%). Qualified for Administrative Inquiry — 6 known, 3 anonymous; subtotal 9 (2.47%). Shared for Action — 19 known, 10 anonymous; subtotal 29 (7.97%). Shared for Sensitization — 33 known, 40 anonymous; subtotal 73 (20.05%). Information Enrichment — 7 known, 11 anonymous; subtotal 18 (4.95%). Closed with no further Action — 100 known, 96 anonymous; subtotal 196 (53.85%). Total — 204 known, 160 anonymous; 364.

Of the total 168 corruption reports meriting further actions, following sections present deeper analysis by area, offence, agency, place of occurrence, and profession:

● **Area:** In the reporting year, corruption reports by area indicate that *Finance* was the most reported, with **57** out of 168 corruption reports (33.9%), underscoring persistent vulnerabilities in financial management and oversight. This was followed by *Procurement & Contract* with 33 reports, highlighting risks in tendering and contract implementation. *Public Property* (24 reports, 14.3%) and *Natural Resources* (23 reports, 13.7%) also recorded higher incidences, reflecting exposure in asset use and resource management. *Human Resource* (21 reports, 12.5%) pointed to irregularities in staffing and personnel practices. In contrast, relatively fewer reports were recorded in *Policy & Regulation* (6 cases, 3.6%) and *Public Service Delivery* (4 cases, 2.4%) as illustrated in **Figure 4.4.**
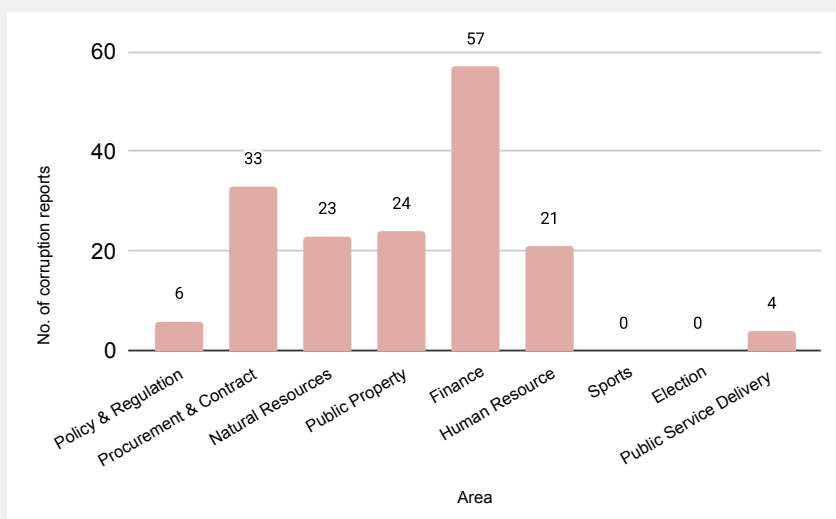

Figure 4.4: Corruption Reports by Area

● **Agency:** Corruption reports across agencies during the reporting year reveal significant disparities, reflecting varying levels of vulnerability or scrutiny. *Ministries* recorded the highest number with **46** reports, followed by *Gewog Administrations* (32), while the *Private Sector* (23) and *Dzongkhag Administrations* (21) also featured prominently. In contrast, *Religious Organizations* (1) and *Constitutional Offices* (2) registered fewest reports, suggesting either lower exposure to corruption-prone activities or possible underreporting. Other agencies fell within a moderate range, including the *Armed Forces* (11), *Financial Institutions* (10), *Corporations* (8), and *Autonomous Agencies* (6) as shown in Figure **4.5.**
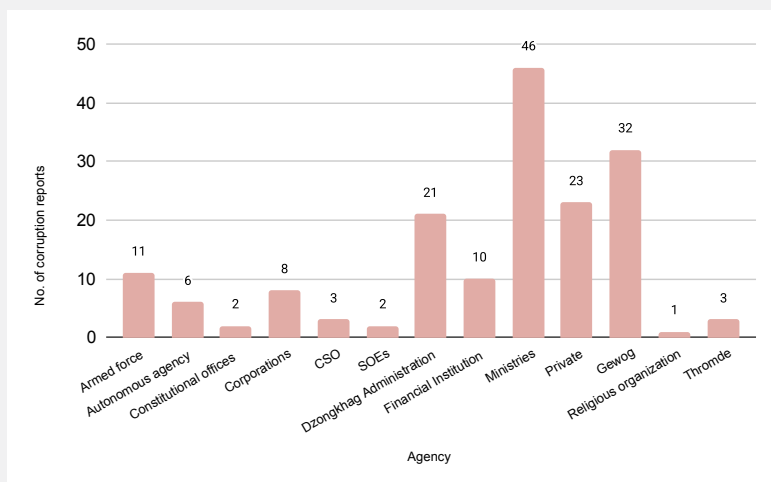
Figure 4.5: Corruption Reports received agency-wise

- **Offence:** Of the 168 corruption reports warranting action during the reporting year, the majority involved *Abuse of Function* (86 reports, 51.2%), underscoring the persistent misuse of official authority for personal gain. This was followed by *Embezzlement* (32 reports, 19.0%) and *Bribery* (18 reports, 10.7%), reflecting financial and transactional forms of corruption as shown in **Figure 4.6**. Less frequent but notable offences included *Conflict of Interest* (4 reports), *False Claims* (2), and one report each of *Disproportionate Asset* and *Abuse of Privileged Information*. Though limited in number, it suggest that there is risks of more sophisticated or concealed forms of corruption. The *'Others'* category (24 reports, 14.3%) includes diverse issues such as illegal land dealings, unauthorized constructions, tender manipulation, financial fraud, tax evasion, business fronting, forgery, misuse of resources, substandard public works, as well as illicit activities like online gambling and false identity claims.
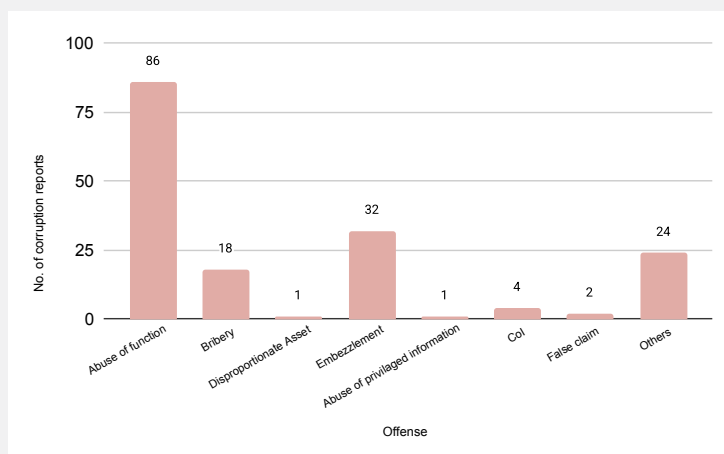

Figure 4.6: Corruption Reports by alleged corruption offences

- **Place of Occurrence:** During the reporting year, *Thimphu* recorded the highest number of corruption reports (43), reflecting a significant concentration of corruption incidences in the capital. This was followed by *Paro* (33), *Samtse* (13), *Chhukha* (12), and *Mongar* (11) as depicted in **Figure 4.7**. Moderate levels were observed in Punakha (9), Wangdue Phodrang (7), and Sarpang and Samdrup Jongkhar with six each report. In contrast, Dzongkhags such as Trashigang, Trashiyangtse, Lhuentse, and Dagana registered only three reports each, while *Gasa* and *Pemagatshel* reported none, possibly reflecting either genuinely lower incidence or the effect of smaller populations and fewer activities. Additionally, three reports could not be attributed to a specific location.
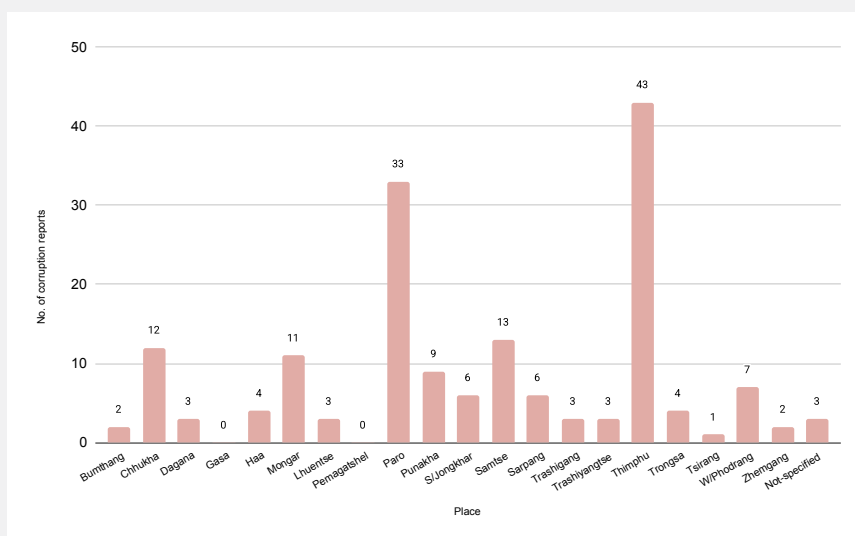
Figure 4.7: *Corruption Reports by Place of Occurrence*

- **Profession:** The majority of corruption reports involved *Civil Servants*, accounting for **71** reports (42.26%), reflecting the sector's significant exposure to integrity risks. This was followed by *Local Government (LG) functionaries* (33 reports), *corporate employees* (17), and *armed personnel* (12). Smaller numbers were reported against businesspersons and farmers (7 each), private employees (6), and contract employees (4). Reports involving CSO employees, foreign workers, religious personnel, and volunteers had 2-3 each, indicating that while risks are more limited, corruption concerns are present across a wide spectrum of professions as illustrated in **Figure 4.8**.
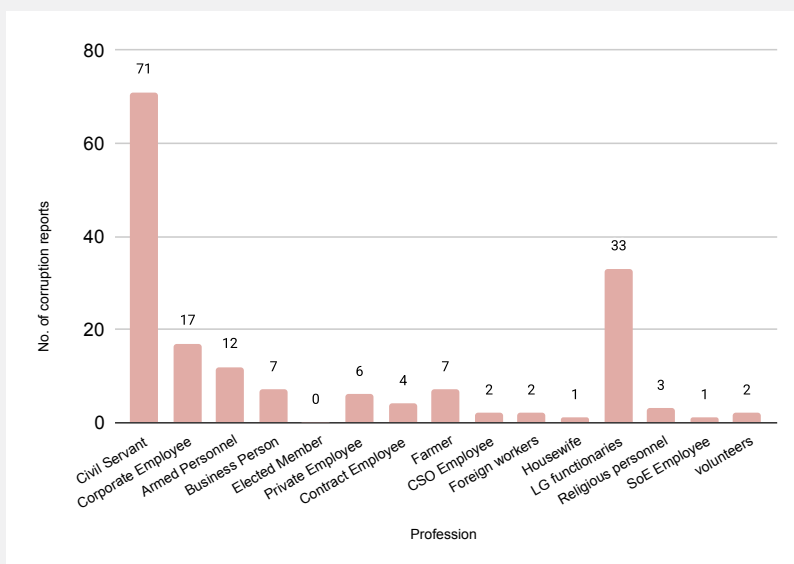
Figure 4.8: *Corruption Reports by Profession*

d) Corruption Reports Qualified for Information Enrichment

During the reporting period, **18** corruption reports qualified for *Information Enrichment (IE)*. Additionally, **three** more were assigned from the corruption reports shared for administrative actions to various agencies and **one** upgraded from sensitization to IE, bringing the total number of corruption reports qualified for IE to **22**. Of these, three were shared to relevant agencies for further action, one each was upgraded for investigation and administrative inquiry; and 17 were closed with no further action as detailed in **Table 4.3.**

Table 4.3. Status of corruption reports qualified for IEs and pending IEs from previous years

Year	Number of IEs	Decisions of IE findings					Ongoing	Pending
		Closed	Upgraded for Investigation	Shared for Action	Shared for Sensitization	Administrative Inquiry		
2024-2025	22	17	1	3	0	1	0	0
2023-2024	4	3	0	1	0	0	0	0
2021-2022	1	1	0	0	0	0	0	0
Total	**27**	21	1	4	0	1	0	0
		27						

e) Corruption Reports Qualified for Administrative Action and Sensitization

In the reporting period, from the total of **102** corruption reports qualified to be shared with the agencies, 29 were shared for administrative action and 73 for sensitization. The status of the pending corruption reports shared for administrative action since the FY 2019-2020 is shown in Table **4.4.**

Table 4.4. Status of corruption reports shared for administrative action and pending Action Taken Reports (ATR) from previous years

| Year | Shared for Action | Decisions on ATRs | | | | Under Review | Total | ATR not received |
		Closed	Upgraded for Investigation	Upgraded for IE	Deferred for more action			
2024-2025	29	20	0	0	2	0	22	7
2023-2024	4	3	0	0	0	0	3	1
2022-2023	4	4	0	0	0	0	4	0
2021-2022	9	8	0	0	0	0	8	1
2020-2021	4	3	0	0	1	0	4	0
2019-2020	1	1	0	0	0	0	1	0
Total	51	39	0	0	3	0	42	9
		42						

Of the 22 ATRs received from the 29 shared during the reporting year, **16** were found to be *Valid,* **two** were partially *True*, and **four** were found to be *Baseless.* A summary of the actions resulting from the ATRs is provided in **Table 4.5**

Table 4.5: Summary of administrative actions and its outcomes

SN	Type of Action Imposed	Quantity
1	Administrative/disciplinary sanctions accorded	6
2	Systemic correction/rectifications initiated	7
3	Upgraded for Investigation	1
4	Sensitization	2
5	Referral to relevant agencies	8
6	Recoveries made	Nu.720,634.000

At the end of the reporting period, a total of **nine** ATRs were not received from various agencies, marking a significant reduction from 22 in the previous year. This continued decline demonstrates the effectiveness of the Administrative Complaints Resolution Division (ACRD) in expediting administrative inquiries and follow-up actions.

Table 4.6: Status of Pending ATRs by agencies

SN	Agency	2021-2022	2022-2023	2023-2024	2024-2025	Total
1	Dagala Gewog (Thimphu)	0	0	0	1	1
2	Paro Dzongkhag	0	0	0	2	2
3	Punakha Dzongkhag	1	0	0	1	2
4	Royal Audit Authority	0	0	1	1	2
5	Royal Monetary Authority	0	0	0	1	1
6	Trashiyangtse Dzongkhag	0	0	0	1	1
	Total					9

f) Corruption Reports Qualified for Administrative Inquiry

In the reporting period, a total of **nine (09)** *Administrative Inquiry* (AI) was assigned. Additionally, one each AI was assigned from IE and Intel Project respectively, increasing the total AI assigned to **11**. All the AIs were completed in the reporting period with none pending.

Of the 11 AIs conducted during the reporting year, the majority were in *Finance* (5), followed by *Human Resource* (3), *Public Property* (2), and *Procurement & Contract* (1). By agency, most inquiries pertained to *Ministries* (4), followed by *Constitutional Offices* (2), with one case each in the *Armed Forces*, *Autonomous Agencies*, dzongkhag administrations, *Financial Institutions*, and *Local Governments*. By profession, the inquiries resulted in administrative or disciplinary sanctions against *civil servants* (7), *corporate employees* (2), *armed personnel* (1), and an *elected member* (1).

Of the 11 AIs assigned, *administrative or disciplinary sanctions* were imposed in four cases. *Systemic corrections or rectifications* were initiated in six cases while only one case advanced to investigation. Notably, recoveries totaling **Nu.7.483 million** were achieved, representing a substantial financial recovery.

g) Referrals from Royal Audit Authority (RAA)

In the reporting period, the ACC received four referrals related to suspicious fraud and corruption from the RAA as shown in the **Table 4.7**.

Table 4.7: Status of pending referrals from the RAA to the ACC

| Year | No. of pending Referrals | Status | | | | | | |
| | | ACC | | OAG | | Royal Court of Justice | Other Agencies | Closed |
		Not Assigned	Under Investigation	Under review	Pending Enforcement	Under Trial		
2024-2025	4	3	0	0	0	0	0	1
2023-2024	3	0	1	2	0	0	0	0
2022-2023 & since 2019	42	0	6	14	13	3	3	3
Total	**49**	**3**	**7**	**16**	**13**	**3**	**3**	**4**

h) Corruption Reports qualified for Investigation

A total of **39** corruption reports received during the reporting period qualified for investigation. Additionally, **one** IE was upgraded for investigation. Therefore, the total number of corruption reports qualifying for investigation during the reporting period stands at **40** as shown in **Table 4.8.**

Table 4.8: Corruption Reports Qualified for Investigation

Year of Corruption Reports	Description	Number of Corruption Reports
2024-2025	Corruption Reports	39
	IE upgraded	1
Total		**40**

The analysis into **40** corruption reports qualified for investigation are presented below by area, offence, agency, place of occurrence, and profession:

- **Area:** In terms of area, most corruption reports qualified for investigation were under *Finance* (26) indicating that financial mismanagement and irregularities remain a primary concern, followed by *Procurement & Contract* (10) suggesting vulnerabilities in bidding processes, supplier selection, and contract execution, among others. *Natural Resources* accounted for two corruption reports qualified for investigation. While *Public Property* and *Human Resource* each recorded one report, showing that while corruption is less frequently reported in these areas, risks still exist, particularly in asset management and personnel recruitment or promotions as depicted in **Figure 4.9**.
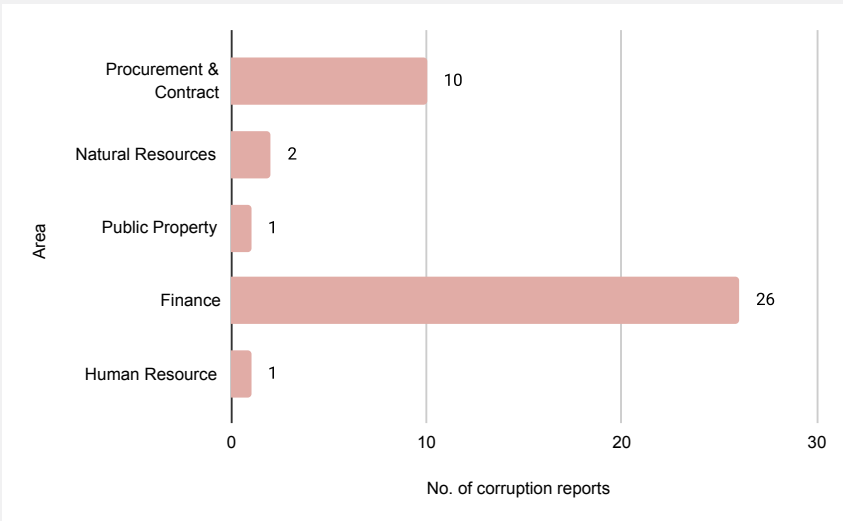
Figure 4.9: *Corruption reports qualified for investigation by area*

- **Offence:** In terms of offence, most corruption reports qualified for investigation were under *Embezzlement* (19), followed by *Bribery* (16) and *Abuse of Function* (3) as shown in **Figure 4.10**. The persistence of these three offences over the years indicates entrenched patterns of misconduct rather than isolated incidents, pointing to the need for targeted preventive measures such as tighter internal controls and stronger enforcement mechanisms. Conversely, *Disproportionate Asset* and *False Claim* each recorded one report.
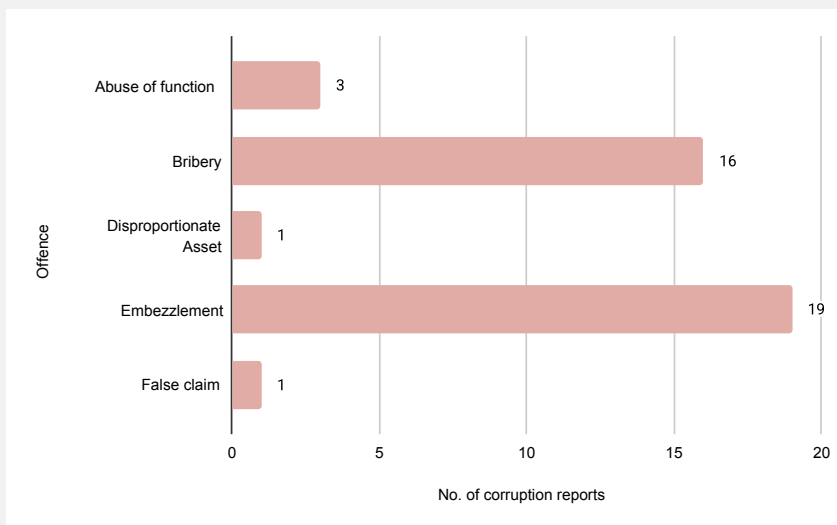
Figure 4.10: *Corruption reports qualified for investigation by offence*

● **Agency:** Amongst the agencies, *Ministries* had the highest with 12 corruption reports qualified for investigation followed by *Dzongkhag Administration* with 11 corruption reports. The *Armed Forces* recorded six reports, while *Financial Institutions* recorded three. *Autonomous agencies, CSO,* and *LGs* each had two reports, whereas *Corporations* and the *Private Sector* had the lowest with one corruption report each, as illustrated in **Figure 4.11**.
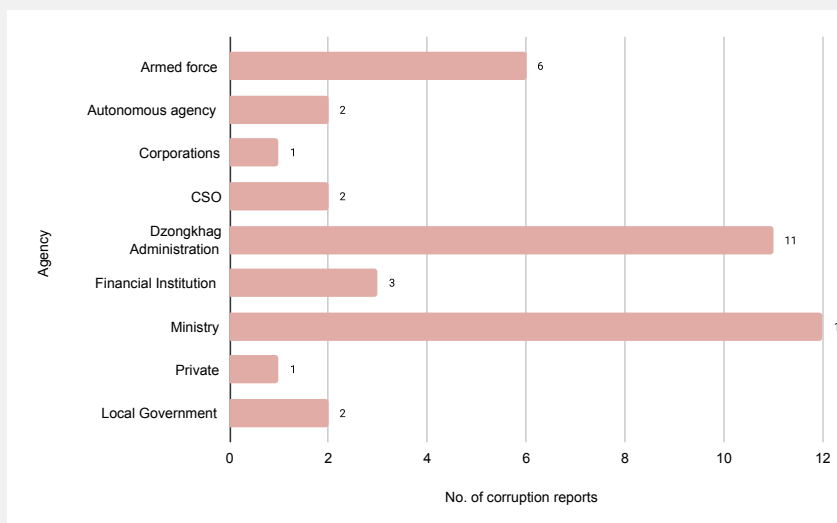
Figure 4.11: *Corruption reports qualified for investigation by agency*

- **Place of Occurrence:** *Paro* recorded the highest number of corruption reports qualifying for investigation (14), followed by *Thimphu* (6), *Samtse* (5), and *Mongar* (3). Bumthang, Haa, Punakha, Samdrup Jongkhar, and Wangdue Phodrang each had two reports qualified for investigation, while Trashiyangtse and Zhemgang had one case each as shown in **Figure 4.12**. This distribution points to a concentration of reported corruption in specific districts, particularly in Paro, though the higher figures may also reflect a stronger reporting culture and greater public awareness rather than a disproportionately higher level of corruption.
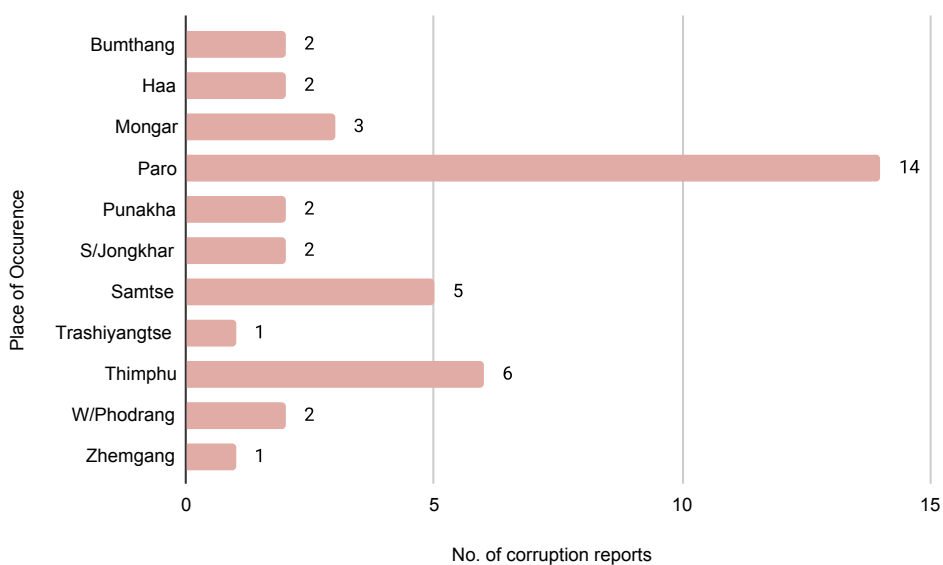
Figure 4.12: *Corruption reports qualified for investigation by place of occurrence*

- **Profession:** The majority of the corruption reports that qualified for investigation pertained to *Civil Servants* (23) as they typically hold significant discretionary power over public resources and services, creating numerous opportunities for corrupt practices. *Armed Personnel* recorded six, followed by *Corporate Employees* with four reports. *LG functionaries* accounted for two, while *Businesspersons, Contract Employees, Volunteers, CSO Employees,* and *Religious Personnel* each had one corruption reports qualify for investigation as illustrated in **Figure 4.13**.
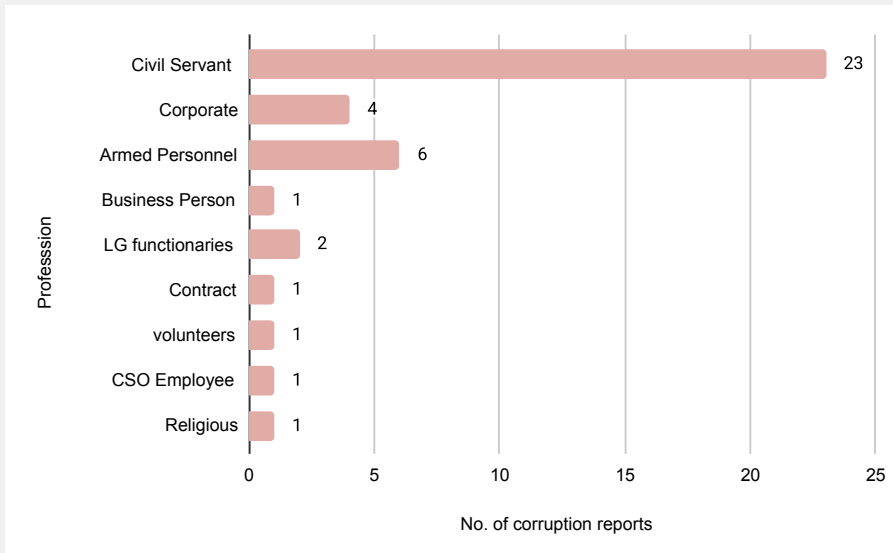
Figure 4.13: *Corruption reports qualified for investigation by profession*

4.2 INVESTIGATION AND ITS OUTCOME

a) Caseload and Outcome

During the reporting period, 39 new cases were opened, adding to the 22 cases carried over from the previous year, resulting in a total caseload of 61 as shown in **Table 4.9**. Out of these, 39 cases were closed, achieving a clearance rate of **63.93%**. The average TAT for completing a case improved to **51.09 working days**, compared to 54.7 working days in the previous reporting year.

Table 4.9: Caseload and status of investigation

Description	Old			New			Total	%
	Proactive	Offshoot	Reactive	Proactive	Offshoot	Reactive		
No. of cases carried over to 2024-25	4	0	18	0	0	0	22	**36.07%**
New cases opened during the year	0	0	0	6	13	20	39	**63.94%**
Total caseload	**4**		**18**	**19**		**20**	**61**	**100%**
Proportion of proactive investigation	**4**			**19**			**23**	**37.70%**
Closed	**3**		**7**	**3**	**13**	**13**	**39**	**63.93%**
Status of investigation								
1. Investigation completed:								
Forwarded to OAG	1	0	5	1	11	9	**26***	**42.62%**
Referral to agency for administrative action	1	0	1	1	1	4	**8**	**13.11%**
Closed with no further action	1	0	1	1	1	0	**5**	**8.12%**
2. Investigation on-going/Open	1	0	11	3	0	7	**22**	**36.07%**
Total	**4**	**0**	**18**	**6**	**13**	**20**	**61**	**100%**

*26 cases include six cases that were forwarded after July 2025.

Of the 39 cases completed, **26** were forwarded for prosecution, eight referred to agencies for administrative or disciplinary action, and five closed with no further action. Notably, the share of proactive intelligence-based investigations rose to **31.15%** of new cases in the reporting year, compared to 15.6% in the previous year, more than doubling and reflecting a decisive strategic shift toward intelligence-driven enforcement.

b) Profile of an offender

A total of 485 individuals have been implicated, excluding repeated appearances in the same case, with the majority being *Private employees* (346), followed by *Civil Servants* (42), *Armed Personnel* (37), *Farmers* (22), *Corporate Employee* (17), and *Businesspersons* (16). *Volunteers* (3), *Elected Members* (1), and *Others* (1) each account for less than 1%, while contract employees and CSO employees show no recorded cases, as depicted in **Figure 4.14**. The data shows that private sector employees constitute a disproportionately large share of offenders, pointing to greater vulnerability and opportunity for misconduct in this group. This shift may reflect a changing corruption landscape, as Bhutan transitions from a Least Developed Country (LDC) with public sector-centered risks to a lower Middle-Income Economy where the expanding private sector plays a larger role in development, creating new integrity challenges.
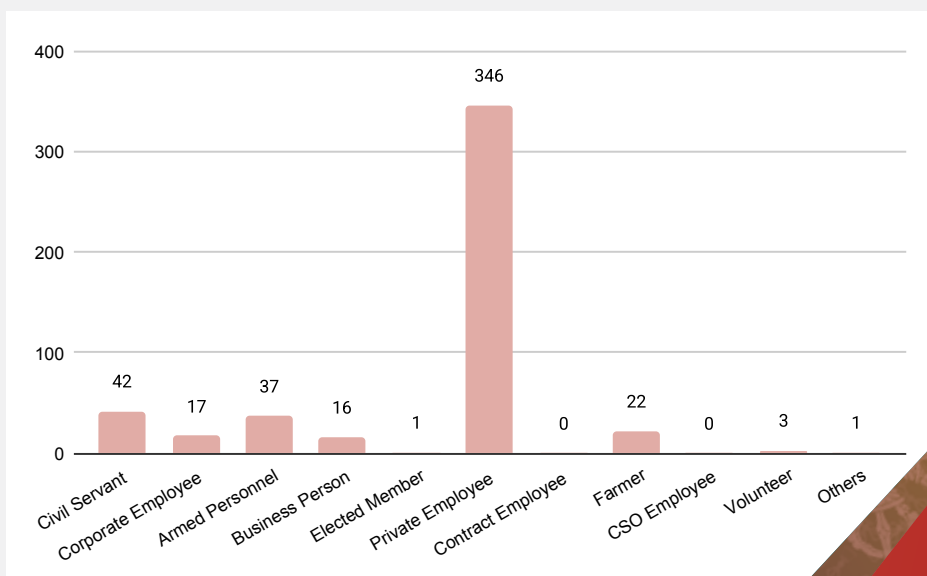

Figure 4.14: Profile of an offender

c) Profile of the offender by Gender

In the reporting year, the vast majority of offenders pertained to *Male*, with **441** (90.93%) cases compared to only **44** (9.07%) *Female* offenders as shown in **Figure 4.15**. Such a significant gender disparity suggests that offending behavior in this dataset is heavily male dominated, which aligns with common criminological findings that men are more frequently involved in criminal activities than women.
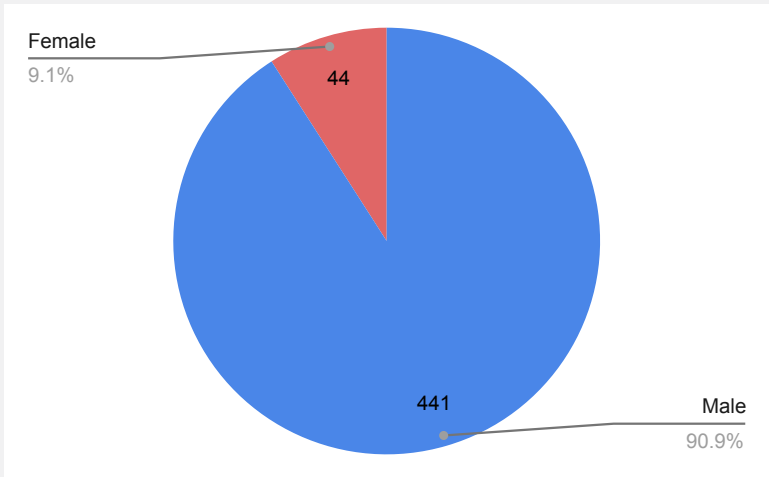
Female
9.1%

44

441

Male
90.9%

Figure 4.15: *Profile of an offender by gender*

d) Profile of the offender by Agency

In the reporting year, the majority of offenses are committed by individuals in the *Private Sector* (366) as shown in **Figure 4.16**, accounting for a dominant share compared to all other categories combined. This suggests that non-governmental actors are the most frequent offenders, potentially due to their larger population base, greater diversity of activities, and fewer regulatory constraints. In contrast, *Armed Forces* (37) and *Dzongkhag Administrations* (37) show relatively moderate numbers, possibly reflecting both their operational scope and the higher public accountability expected of such institutions, followed by the Farmers (22). The Corporation (9), Financial Institutions (8), and Ministries (5) recorded the lowest offense counts, likely due to stricter governance and oversight. There is one category that falls under 'Others' as the individual does not have specific work and does not fall under the categories of the agencies listed. Overall, the distribution highlights that corruption in the private sector is gaining prominence, demanding stronger preventive frameworks and regulatory oversight.
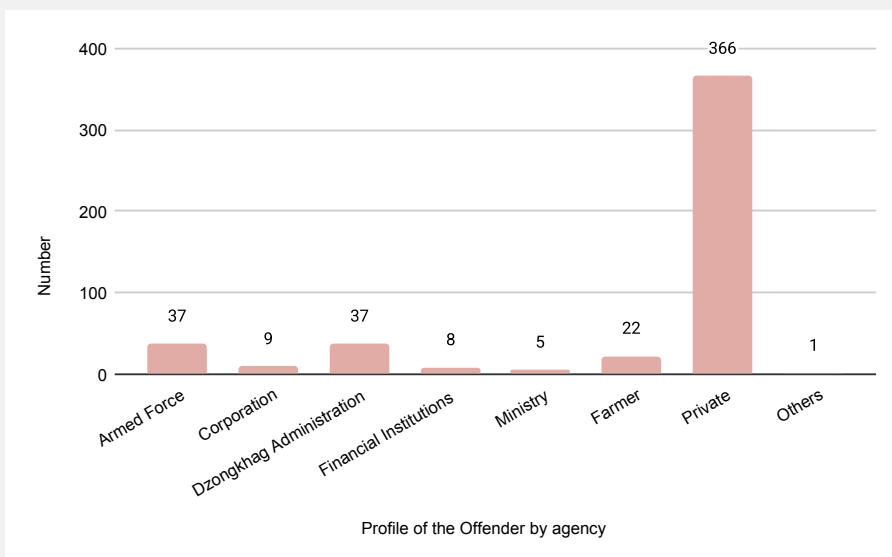
Figure 4.16: *Profile of an offender by agency*

e) Offences by Counts and Number of Individuals Implicated

A total of **591** individuals were *implicated*, including those who appeared more than once across single or multiple cases. Of these, 547 (92.55%) were referred for prosecution, 43 (7.28%) were referred to their agencies for administrative action, and one (0.17%) received a cautionary notice. The 547 prosecuted individuals faced 1,637 counts of charges under 27 different types of offences, with several individuals carrying multiple charges. When these multiple charges are accounted for, the total number of implicated individuals referred for prosecution rises to 616.

The most significant volume of counts relates to *Participation in an Offence*, recording 581 counts involving 447 individuals as shown in **Figure 4.17**. This is followed by *Embezzlement of Funds or Securities by Public Servant* (386 counts) and *Commission Amounting to Abuse of Function* (313 counts). *Omission Amounting to Abuse of Function* (176 counts) also emerges as a major offence, pointing to systemic failures in duty fulfilment. Bribery-related offences, particularly *Active Bribery of Public Servant* (41 counts) and *Passive Bribery of Public Servant* (43 counts), remains persistent risks. Other offences such as forgery, deceptive practices, fronting, and tampering with records were

recorded in only one to three cases each, suggesting either isolated misconduct or gaps in detection. These findings highlight deep systemic weaknesses, where coordinated misconduct and abuse of authority are enabled by poor oversight. Bribery continues to be a recurring risk, while the low incidence of niche offences likely reflects under-detection rather than their absence.
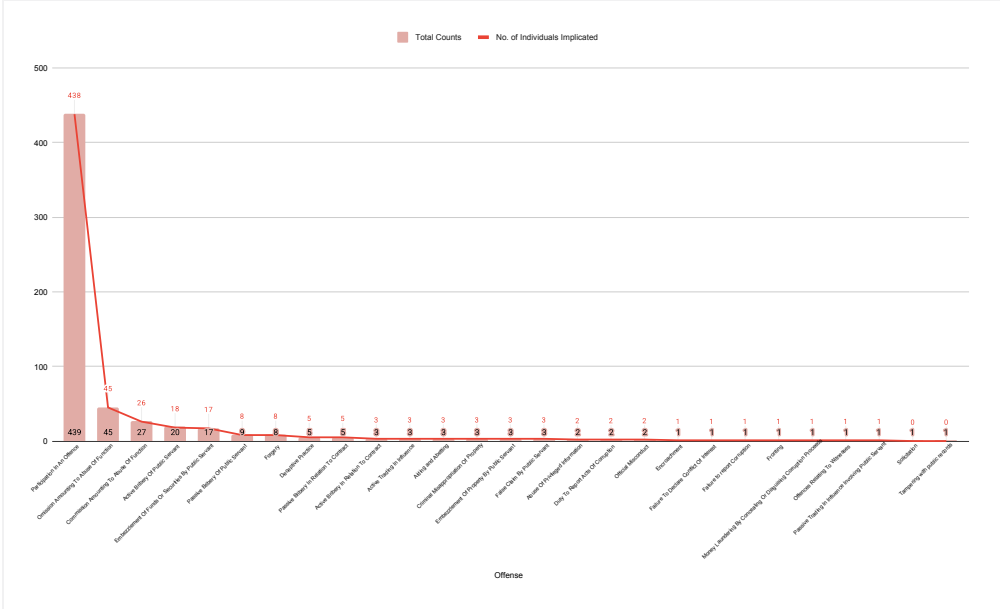
Figure 4.17: *Offences by Counts and Number of Individuals Implicated*

f) Search, Seizure, and Detention

During the reporting period, a total of **four** *Search and Seizure Operations were initiated*, *suspended* **two** individuals and **12** businesses licenses, and *detained* **three** suspects during the investigation process, a decrease from 23 in the previous year. Additionally, 1,523 interviews were conducted, amounting to a total of 2,950.04 man-hours, which averages to approximately 1.2 hours per interview. The ACC also disposed 2,012 seized properties, including documents, electronics, machineries, and land, as well as Nu.4.300 million in cash. These properties were either returned to their respective owners or handed over to the OAG.

g) Prosecution Referral and its Outcome

A total of **20** cases were forwarded for *prosecution* (refer **Annex I)** during the reporting period and the remaining six after the reporting period. At present, **49** cases are currently under the *review* by the OAG (refer **Annex II)**, while **18** cases are pending before various *Trial* Courts (refer **Annex III)**. A total of **34** judgements were rendered by different Courts (refer **Annex IV)**, resulting in 66 convictions against 79 defendants charged, while nine were acquitted and four cases deferred. Excluding the deferred judgment, the conviction rate for the reporting year stands at 88.00% as shown in **Table 4.10**.

Table 4.10: Prosecution Outcome

Year	No. of Cases	Judgment rendered				Conviction Rate
		Charged	Convicted	Acquitted	Deferred	
Jul 2024-Jun 2025	34	79	66	9	4	**88.00%**
Jul 2023-Jun 2024	21	101	87	6	8	**93.50%**
Jul 2022-Jun 2023	25	69	51	17	1	**75.00%**
Jul 2021-Jun 2022	30	127	109	14	4	**88.60%**
Jan 2020-Jun 2021	34	116	71	24	21	**74.70%**
Total	**143**	**492**	**384**	**70**	**38**	84.58%
Conviction Rate over the last five FYs						

h) Profile of Convict by Agency

Of the 66 individuals convicted during the reporting period, *private sector* accounted for the largest share (26), reflecting profit-driven motives, weak internal controls, and uneven regulatory oversight as shown in **Figure 4.18**. Convictions in Thromde (10) and *financial institutions* (9) highlight systemic vulnerabilities in local governance and high-value financial transactions, while cases in *ministries* (7) and *dzongkhag administrations* (5) point to persistent bureaucratic weaknesses such as opaque decision-making and misuse of funds. In contrast, the absence of convictions in CSOs and state-owned enterprises may suggest comparatively stronger governance frameworks, though it could also reflect lower levels of detection and reporting in these entities.
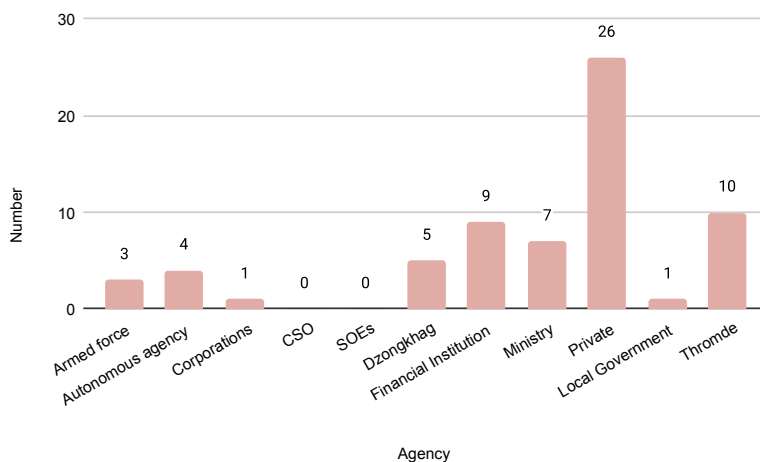
Figure 4.18: *Profile of convict by agency*

i) Status of Restitution Prayed and Ordered

The following **Table 4.11** presents an overview of restitutions prayed by the ACC and ordered by the Courts against cases investigated and prosecuted since 2006.

Table 4.11: Status of Restitution Prayed and Ordered

SN	Year	No. of cases investigated	No. of cases referred for prosecution from the cases investigated	Judgement rendered by Courts against the cases prosecuted	Total Restitution prayed by ACC		Restitution Ordered by Courts		Cases under review by OAG	Cases under Trial at various Courts
					Nu. in million	Kind (Land in Acreage)	Nu. in million	Kind (Land in Acreage)		
1	2006-2019	331	204	74	3,179.52	167.42				
2	2020-2021	31	8	12	37.946	0.8				
3	2021-2022	29	11	19	336.873	0				
4	2022-2023	35	38	16	206.529	0	**1401.15**	**81.974**	**49**	**18**
5	2023-2024	41	29	18	100.511	0				
6	2024-2025	39	24	44	57.574	0.493				
	Total	**506**	**314**	**183**	**3,918.950**	**168.713**				

j) Status of Corruption Reports Qualified for Investigation

The ACC undertook a focused initiative to address the increasing backlog of corruption reports pending investigation. Backlog would include only those corruption reports that are older than the previous two financial years. This involved conducting thorough preliminary desk reviews and incorporating these reports into ongoing investigations. Due to these concerted efforts, the number of pending corruption reports qualified for investigation was successfully reduced to **32** by the end of the reporting period. The status of these reports is summarized in **Table 4.12.**

Table 4.12: Status of Corruption Reports Qualified for Investigation

SN	Year of Corruption Reports	Balance for investigation As per Annual Report 2023-2024	Qualified for investigation in 2024-2025	Assigned for investigation in 2024-25	Balance (Dec 2015)	Balance (Jun 2021)	Current Balance (Jun 2025)
1	2024-2025	-	40	24			16
2	2023-2024	12	-	8			4
3	2022-2023	9	-	6			3
4	2021-2022	12	-	3			9
5	2020-2021	3	-	3			0
6	2018	1	-	1	529	96	0
7	ATRs and/or IEs of 2017 & before – corruption reports reviewed in 2018	2	-	2			0
8	2016	2	-	2			0
9	2012	1	-	1			0
	Total	**42**	**40**	**50**			**32**

*One corruption report which was assigned and investigated in the FY 2023-2024 was reported as not assigned in the Annual Report 2023-2024.

HIGHLIGHT OF FEW CASES INVESTIGATED DURING THE REPORTING YEAR

CASE NO. 1 — **MISAPPROPRIATION OF MONUMENT FEES**

On 16 July 2024, the Royal Bhutan Police (RBP) referred a case to the ACC concerning the alleged misappropriation of monument fees by police personnel stationed at Kyichu and Taktshang in collusion with Ticket Counter Officials (TCOs), Desuups, and tourist guides. Similarly, on 6 August 2024, the RBP referred an additional case involving the misappropriation of monument fees by police personnel deployed at Punakha Dzong, in collusion with TCOs and tourist guides. The RBP's investigation revealed that approximately Nu.3.200 million was embezzled from the monument fees of Taktshang and Kyichu monastery by 33 Police Personnel, four TCOs, and 377 Tourist Guides. Similarly, Nu.0.169 million was embezzled from the monument fees of Punakha Dzong by four police personnel, two TCOs, and 17 tourist guides.

However, the ACC's investigation uncovered that 33 police personnel, two TCOs, 249 out of 317 Tourist Guides, and two Desuups were involved in siphoning a total of Nu.4.621 million from the monument fees collected at Taktshang Monastery. Similarly, two TCOs, 27 Police Personnel, 128 out of 151 Tourist Guides, and one Desuup were found to have embezzled a total of Nu.0.667 million from the monument fees collected at the Kyichu Monastery. Furthermore, two TCOs, four Police Personnel, 40 out of 68 Tourist Guides have embezzled a total of Nu.0.361 million from the monument fees collected at the Punakha Dzong.

The investigation discerned two main *Modus operandi* adopted by the individuals involved in the above fraudulent practices:

- **Resale of Tickets**

  In this method, Tourist Guides or tourists initially purchased entry tickets from the designated ticket counters. Upon arrival at the monument sites, the tickets were presented to the RBP personnel on duty for verification. Standard procedure required that the police retain their portion of the ticket and return the remaining part to the guide or tourist.

  However, the police personnel instead retained the full tickets, particularly from personal guests, who typically did not require receipts for reimbursement. These retained tickets were then returned to the TCOs who resold them to other tourists. To avoid discrepancies and detection, no records were maintained for these subsequent sales.

The proceeds from the resale scheme were then shared equally among the colluding parties, which included the TCOs, Police Personnel, and Desuups on duty. The TCOs ensured the illicit earnings were deposited into their respective accounts, typically on the same day or within one to two days.

- **Entry Without Tickets (in Collusion with Police Personnel)**

In this scheme, tourist guides collected entry fees directly from tourists without purchasing tickets. Upon arrival at the monument sites, they coordinated with the RBP personnel on duty, sharing half of the collected amount with them. In return, the RBP personnel facilitated the unauthorized entry of tourists into the monastery or Dzong without tickets. To conceal this misconduct, the police deliberately omitted recording the entries, effectively bypassing the standard monitoring procedures and avoiding detection.

The fraudulent scheme outlined above has resulted in a financial loss of Nu.5.650 million to the State.

The ACC's investigation uncovered not only irregularities in the collection of monument fees but also broader systemic issues and potential vulnerabilities within the tourism sector. These include the misuse of the Sustainable Development Fees (SDF) by external agents, deceptive itineraries, manipulative pricing of services, and the widespread prevalence of multiple commission systems. If left unaddressed, these issues could pose a serious threat to the integrity and sustainability of Bhutan's tourism industry and, by extension, to the nation's economy and reputation. In recognition of the potential negative implications, the ACC convened a stakeholder meeting on 15 January 2025 to present the key findings and insights from the case investigation, even as the investigations were ongoing. The stakeholders included the Dzongkhag Administrations of Paro, Punakha, and Thimphu, the Ministry of Home Affairs, the RBP, the DoT, the Guide Association of Bhutan, and the Association of Bhutanese Tour Operators.

The primary objective of the meeting was to initiate comprehensive and systemic reforms based on the investigation's outcomes and to engage relevant agencies in collaboratively addressing the identified challenges in the tourism sector. Following the meeting, the ACC formally shared in writing, outlining the systemic issues and corresponding recommendations with all the participating stakeholders.

The ACC has completed a wide-ranging investigation into systemic corruption within the Engineering Cell of the Dzongkhag Administration, Paro. The operation was launched on 12 August 2024 following intelligence leads and preliminary assessments that indicated serious ethical and legal breaches in public procurement and infrastructure development activities. The operation led to the arrest and detention of two engineers, with search and seizure operations conducted at both their offices and residences. The investigation, covering the period from 2018 to 2024, revealed entrenched corrupt practices that severely undermined the integrity of the public procurement process and compromised project execution.

The investigation uncovered serious misconduct by engineers, involving abuse of power, manipulation of documents, bribery, and fraudulent practices related to the awarding of tenders and the execution of the projects. Evidence suggests that they partnered with licensed contractors, acting as fronts in bidding processes while holding official positions, and executed projects. Additionally, evidence suggests that the engineers, while holding positions at the Dzongkhag Administration, conspired with licensed contractors who acted as proxies in the bidding process, ultimately securing the bids, which were then executed by the engineers.

The investigation further revealed that an engineer secretly obtained a construction license while continuing to serve as Chairperson or a member of the Tender Evaluation Committee. He failed to disclose his conflict of interest and instead scored the bid favorably, fully aware that forged documents had been submitted to make the bid appear competitive, thus securing the contract fraudulently.

- *Bribery and Abuse of Function*: The site engineer, in collusion with the disguised contractor, compromised quality control and oversight in return for financial benefits. Another engineer manipulated a limited tender process to benefit her spouse, submitting multiple bids under various licenses without the license holders' knowledge, and fraudulently winning the contract.

- *Trading in Influence and Bank Fraud*: An engineer was found to have colluded with a private individual and a Bank of Bhutan Limited official. In exchange for financial incentives, the bank official falsified bank guarantees and misused the bank's internal systems to divert funds into personal and associated accounts.

- *Manipulation of Tendering Process*: Another engineer, in violation of the Civil Service Code of Conduct, inflated cost estimates in the tender document to mislead other bidders. She used a relative's construction license without disclosure, managed project execution herself, and routed all payments into her personal account, clearly establishing her as the actual beneficiary of the contract.

The ACC's investigation extended to 17 construction projects, of which 16 were in Paro and one in Haa Dzongkhag. A total of 27 individuals have been implicated, including six public officials (two primary and four additional) and 21 private individuals. The ACC has pursued the recovery of Nu.13.000 million, representing bribes and illegal gains derived from the corruption scheme. Eight construction licenses have been prohibited for their involvement in fraudulent bidding and execution practices.

These unethical and fraudulent actions not only violated established procurement norms and compromised the overall integrity of the system but also unjustly denied numerous contractors the opportunities they rightfully deserved.

The ACC has completed an investigation into a significant case of embezzlement and abuse of official functions involving forestry officials at the Khotokha Forest Management Unit (FMU) under Wangdue District. The case came to light during a revenue audit conducted by the RRCO, Thimphu. The investigation revealed fraudulent practices resulting in a total loss of Nu.8.595 million to the State for the financial year 2018-2019.

The investigation focused on systemic misuse of authority and revenue manipulation, which enabled illegal timber transactions, misrepresentation of financial records, and improper issuance of documents.

Key Findings include:

- *Cancellation and Manipulation of Revenue Receipts (RMRs):* Officials in charge of revenue operations at the FMU fraudulently cancelled RMRs from the RAMIS system to misrepresent collections and divert the corresponding revenue. Further, duplicate and triplicate copies of RMRs were manipulated to underreport timber volume and compensation, resulting in embezzlement of over Nu.2.119 million.

- *Fraudulent Issuance of Internal Timber Movement Orders (ITMOs):* Investigators discovered the issuance of multiple ITMOs by reusing RMR numbers and referencing incomplete or incorrect information. A total of 46 ITMOs were found to have been fraudulently issued, causing a financial loss of approximately Nu.3.629 million.

- *Failure to Realize Fines:* As per the Forest and Nature Conservation Act 1995 and its regulations, fines are to be imposed on individuals involved in illegal timber extraction. The investigation found that fines were not collected before issuing ITMOs and releasing timber, leading to a revenue loss of Nu.2.277 million.

- *False Reward Claims:* Officials claimed rewards amounting to Nu.0.242 million under the pretext of having realized fines, despite no such fines being officially recorded or collected.

- *Non-Compliance with Compounding Procedures:* The investigation also found that the responsible officer failed to compound forest offences as mandated by the law. This deliberate omission allowed corrupt activities to continue unchecked and further enabled revenue leakages.

- *Collusion with External Parties:* A separate but related finding uncovered the misuse of ITMO booklets maintained by a public agency. These were illicitly used by an official in collusion with a private sawmill manager to support illegal timber extraction and submit fraudulent corporate claims.

This case underscores the presence of entrenched corrupt practices, manipulation of public systems, and weak compliance mechanisms within the forestry sector. A total of six individuals have been implicated, including five public officials and one private individual. The ACC has pursued the recovery of Nu.8.595 million, representing illegal gains derived from the corruption scheme.

MISAPPROPRIATION OF VEHICLE TYRES IN STCBL

On 10 August 2023, the RAA issued a compliance audit report for STCBL covering the period from January 2020 to December 2022. The audit report identified a major discrepancy in tyres inventory in the Apollo Unit, STCBL both at the Head Office and Regional Office. Following that, STCBL conducted its own internal audit and subsequently on 24 August 2024 shared its findings regarding the tyre shortages with the ACC implicating its own operational staff responsible to manage and account sales and inventories of tyres. In addition to the inventory shortage, the STCBL also pointed out in its referral report about the discrepancy surrounding the trade receivables. Based on the nature of scope and other operational considerations, the ACC opened two investigations.

The ACC's investigation found that certain sales staff both in the STCBL Head Office and its Phuntsholing Regional Office at various position levels, from helper all the way up to the executive, were involved in the gross misuse of vehicle tyres. Two sales staff in Phuenstholing failed to account for a total of 509 tyres and 212 flaps and tubes, valued at Nu.3.723 million, missing from its physical inventory. Similar shortage worth Nu.1.010 million was detected in STCBL Head Office in Thimphu during the physical inspection.

The investigation revealed that the stock discrepancies did not arise from any inadvertent, unforeseen or uncontrollable circumstances without the knowledge or involvement of the two alleged sales staff but from their deliberate acts of misuse, manipulation and coverup. The evidence showed that the two staff have created fictitious stock transfers in the Enterprise Resource Planning (ERP) system in order to falsely account for the missing tyres worth Nu.0.519 million.

The staff in Thimphu did the same for the inventory worth Nu.0.872 million. They have jointly or severally embezzled the sale proceeds on various occasions by flouting the internal credit sales policy and procedure. They collected customers' payment into their personal savings account and falsified customers' credit accounts without their knowledge. Such malpractices occurred under the leadership of the Head of the Division, who, instead of exercising managerial control and due diligence over his staff and sales operation, abused his position and systemic weaknesses to misappropriate tyres worth Nu.2.333 million from Phutsholing Regional Office and Nu.1.368 million from Thimphu Head Office without any payments or sales document.

The investigation findings underscored weak and unethical leadership, lack of robust systemic structure to support internal check and balance mechanisms and poor corporate governance.

SECTION

05

ORGANIZATIONAL INSIGHT

5.1 STRUCTURE, STAFFING, AND CAPACITY

a) Organizational Structure and Staffing

The ACC strengthened its organizational structure to enhance agility and responsiveness under the 13th FYP staffing framework, with the approved staff strength revised from 158 to 165. This adjustment reinstated critical positions such as ICT Officer, ICT Technical Associate, Finance Officer, Accounts Assistant, and Integrity Promotion Assistant in the Policy and Planning Division, and upgraded the Administrative Complaints Resolution Service to a Division.

As of June 2025, the ACC had 134 officials (excluding the Commission, drivers, and ESP/GSP personnel), of which 57 were female and 77 male, with an average age of 34.2 years. The majority of staff fall within the 30–40 age bracket and 23.1% serve on contract appointments, while the rest are on regular service. In terms of experience, only four officials have served more than 15 years whereas 20 have 10–15 years and 37 have 5–9 years. The largest group comprises of 56 officials with 1–5 years of service and 17 with less than one year, highlighting the predominance of relatively new staff.

During the reporting period, 10 officials were on long-term training, extraordinary leave, or deputation, leaving an effective operational strength of 124. Despite the separation of 12 officials, operational continuity was sustained through the recruitment of 16 new staff and strategic redeployments across divisions as shown in **Table 5.1**.

Table 5.1 Details on staff recruitment and separation

Departments/ Divisions	Revised Approved Staff Strength	Staff Strength (as of 30 June 2024)	Separated	Recruited	Internally Transferred	Staff Strength (as of 30 June 2025)
Department of Investigation	34	33	2	4	5	30
Department of Professional Support	27	19	0	0	7	20
Department of Prevention & Education	25	18	4	2	3	20
Division of Analysis & Research	17	16	3	1	7	17
Legal Division	12	10	0	0	5	11
Policy & Planning Division	7	6	0	0	2	4
Bumthang Regional Office	8	4	1	2	1	6
Trashigang Regional Office	8	6	1	1	3	5
Phuentsholing Regional Office	10	7	1	3	7	10
Secretariat Services						
HR & Training Services	3	3	0	1	1	3
Administration & Finance Services	11	6	0	0	1	6
ICT Services	2	0	0	2		2
Security Services	1	0	0	0	0	0
Total	**165**	**128**	**12**	**16**	**42**	**134**

b) Attraction and Retention of Staff

During the reporting year, the ACC recorded 12 staff separations, bringing the attrition rate down to **8.33%**, a sharp decline from the **17.95%** recorded in the previous year as depicted **Table 5.2**. While this drop reflects a positive short-term improvement, the **five-year average attrition rate of 12.8%** remains considerably higher than the broader civil service average, underscoring persistent challenges in workforce stability.

Table 5.2 Attrition rate for the last six years

Year	Total Staff (end of reporting period)	No. of staff recruited	No. of staff separated	Attrition rate (%)
July 2024 – Jun 2025	134	16	12	8.33%
July 2023 – Jun 2024	128	15	28	17.95%
July 2022 – Jun 2023	141	38	25	15.06%
July 2021 – June 2022	128	19	20	13.51%
Jan 2020 – June 2021	129	24	13	9.15%
2019	118	19	6	4.38%

The nature of these departures highlights the risks to institutional capacity. Of the 12 separations, **nine were from the Professional & Management category**, two from Support & Supervisory, and one from Operations (due to the passing of an official). Critically, **four of those who left had between 7 and 12 years of service**, representing a significant drain of expertise and institutional memory. The Division of Analysis and Research (DARe) was particularly affected, recording three departures, raising concerns about continuity in a unit central to intelligence-driven and research-based interventions.

Beyond the numbers, the attrition trend reveals that while the influx of 16 new recruits helped replenish numbers and sustain operational continuity, the loss of mid-to-senior level professionals indicates vulnerabilities in talent retention, especially in specialized areas. Unless attrition is addressed through stronger retention measures, career development pathways, and recognition of specialized expertise, the ACC risks recurring cycles of experience loss. Sustained investment in talent retention is therefore essential to safeguard institutional capacity and ensure continuity in the anti-corruption momentum.

STRENGTHENING CAPACITY

for sustained organizational performance

c) Human Resource Capacity

Recognizing persistent competency gaps in managing increasingly complex corruption cases, the ACC continued to prioritize capacity development as a core institutional strategy. During the reporting year, multi-tier mandatory training for new recruits, including *General* and *Operational Courses*, was institutionalized to provide foundational skills, ensure compliance with legal standards, and build operational proficiency from the outset.

Beyond induction, officials benefitted from a mix of in-country and ex-country professional development programs, alongside customized training tailored to investigation, legal analysis, prevention, and advocacy. These efforts helped broaden technical skills and foster cross-functional learning. However, progression beyond the foundational level remains limited, with advanced specialization constrained by budgetary ceilings, leaving the ACC vulnerable in handling sophisticated and high-stakes cases.

To offset these challenges, the ACC strengthened agile workforce strategies, promoting cross-collaboration between the Head Office and Regional Offices. Regional teams, in particular, played a vital role in complaint management, education outreach, prevention, and investigations, concluding 14 cases during the reporting year. This demonstrates their growing importance in sustaining service delivery and mitigating resource constraints, though long-term institutional credibility will hinge on sustained investments in advanced expertise and specialization.

5.2 ORGANIZATIONAL PERFORMANCE METRICS

The ACC achieved an Annual Performance Target (APT) score of **91.6%** for FY 2024-2025. Performance was assessed across key outputs, including timely complaint resolution, more proactive and intelligence-driven investigations, strengthened enforcement and compliance, broader use of data analytics, expanded education and awareness, responsive policy initiatives, staff capacity development, and efficient secretariat services. Financially, Nu.151.002 million of the Nu.152.910 million budget was utilised, reflecting strong budget execution.

For the upcoming year, APTs are aligned with strengthening national integrity and Bhutan's anti-corruption system with continued emphasis on intelligence-led investigations to improve deterrence and a *whole-of-systems* approach preventive-measures targeting vulnerabile institutions and sectors. Concurrently, the ACC will expand education initiatives such as the Youth Integrity Program, thematic trainings, and e-learning modules to deepen societal engagement in anti-corruption. The approved budget for FY 2025-2026 stands at Nu.170.082 million, comprising Nu.129.452 million recurrent and Nu.40.630 million capital.

5.3 ORGANIZATIONAL CULTURE AND WORK PROCESS

- **Digitization of Work Processes for Future-Ready Workforce**

  Recognizing the transformative role of technology in strengthening integrity systems, the ACC continued to consolidate digitization as a strategic pillar for resilience, efficiency, and long-term relevance. During the reporting year, a major milestone was the rollout of the revamped Investigation Module, now being expanded to cover legal vetting, follow-up, and intelligence functions. Enhanced tools for analysis, visualization, and reporting, including AI applications are being embedded to improve accuracy and timeliness. In parallel, the AIMS is being introduced to provide agency-level integrity ratings that integrate both preventive measures and corruption occurrences. Complementary systems such as a central performance dashboard and a web-based platform to track prevention and education programs are also under development. All of these will be linked to a consolidated data repository, supported by the digitization of complaints, investigations, and judgments dating back to 2006, an initiative that strengthens institutional memory while enabling real-time analytics for prevention, enforcement, and strategic planning.

To enhance internal efficiency, the ACC has institutionalized automated systems such as biometric access, online leave and visitor management, dispatch monitoring, and an information repository portal. Security safeguards, firewalls, server mirroring, and data protection protocols, remain central to protecting sensitive data and ensuring operational continuity.

Ultimately, these digital platforms are being designed not in isolation but as part of a larger justice-sector ecosystem, with the long-term vision of seamless integration with prosecution, judiciary, and oversight bodies. This whole-of-system approach will allow faster information sharing, minimize duplication, and enable coordinated responses to corruption. While progress has been significant, sustained investment in digital infrastructure and human capacity will be critical to fully realize the vision of a future-ready, intelligence-driven, and justice-integrated anti-corruption institution.

Reinforcing
COMMUNICATION
for enhanced organizational culture

- **Support and Welfare Schemes for Motivated Workforce**

  The ACC continued to strengthen staff welfare measures during the reporting year, with the Welfare Loan Programme under the Endowment Fund seeing steady uptake. A total of 142 loans were disbursed, benefitting 103 officials, reflecting its tangible impact in supporting financial resilience and employee well-being. Such initiatives remain vital in sustaining morale and motivation in the face of high professional demands and persistent attrition pressures.

- **Celebrating 19 Years of its Operations and Recognizing Staff Achievements**

  On 31st December 2024, ACC observed its 19th Foundation Day under the theme *"19 Years of Passion, Purpose, Progress."* The occasion celebrated the ACC's shared journey, collective experiences, and enduring commitment to integrity and accountability. Marking the milestone, the day was highlighted by the launch of the Founder's Gallery, a tribute to the vision and dedication of those who laid the foundation of the ACC and contributed to its growth. The event also featured a thematic session on *Corporate Liability*, conducted in collaboration with JSW School

of Law, reinforcing the ACC's focus on strengthening legal and institutional frameworks against corruption.

Foundation Day, observed annually on 31st December, remains a significant occasion that not only commemorates the establishment of the ACC through a Royal Decree of His Majesty The Fourth Druk Gyalpo in 2005 but also serves as a reaffirmation of the ACC's pivotal role in promoting integrity, transparency, and accountability, at all the levels.

5.4 LEGAL FRAMEWORK

- **Standards for Information Classification and Handling**: On 19 March 2025, the ACC adopted the Standards for Information Classification and Handling to strengthen the management of information in its custody. Anchored in Sections 32 and 16(1)(l) of the Anti-Corruption Act 2011 and the ACC's Code of Conduct, the Standard establishes a structured framework to classify information according to its value, sensitivity, and risks arising from unauthorised disclosure or loss. It sets principles for access, disclosure, transmission, and secure disposal, while safeguarding confidentiality, authenticity, accuracy, and integrity. Its implementation is expected to enhance institutional safeguards, ensure responsible retention and disposal, and elevate overall standards of confidentiality in the ACC.

- **Publication Guideline**: The ACC also adopted a Publication Guideline to standardise procedures for all publications involving the ACC employees, whether in an official or independent capacity. The guideline seeks to promote professional development, creativity, and scholarly engagement while ensuring compliance with ethical standards, confidentiality obligations, and institutional integrity.

- **Implementation Review Group of UNCAC**: From 17-21 February 2025, the ACC participated in the 16th Session of the UNCAC Implementation Review Group (IRG) in Vienna, where the Executive Summary of Bhutan's Second Cycle Country Review was formally adopted. The review, conducted by Bahrain and Iceland, assessed Bhutan's compliance with Chapter II (Preventive Measures) and Chapter V (Asset Recovery).

  The Summary acknowledged good practices such as the inclusive approach in developing the NIACS 2019-2023, comprehensive recruitment procedures for public officials, public consultations on legislation, and safeguards for due process in criminal law. At the same time, it underscored priority reforms to strengthen Bhutan's compliance, including:

  - safeguarding the operational and financial independence of the ACC;

- adopting the Impeachment Act to clarify removal processes for holders of the constitutional offices;

- legislating access to and disclosure of information;

- consolidating a uniform framework for conflict of interest management; and

- reinforcing anti-money laundering and beneficial ownership transparency measures.

These recommendations provide a clear reform agenda for aligning Bhutan's governance systems with UNCAC standards. Going forward, the challenge lies not only in sustaining existing good practices but also in translating these recommendations into legislative and institutional reforms that further fortify Bhutan's integrity framework.

NATIONAL
NETWORKING
Towards sustainable alliance
against corruption

5.5 NATIONAL NETWORKING

As part of its sustained efforts to strengthen national integrity systems, the ACC actively engaged with national institutions, professional bodies, and academic partners to advance shared anti-corruption goals. These collaborations created platforms for joint problem-solving, knowledge exchange, and the development of sector-specific safeguards, while reinforcing collective responsibility in the fight against corruption. During the reporting year, the ACC pursued the following initiatives:

a) Sectoral Collaborations in Driving Shared Goals

- **Tripartite Forum:** From 6-8 March 2025, the OAG hosted the 3rd tripartite meeting between the ACC, OAG, and RAA in Panbang, Zhemgang, focusing on strengthening institutional synergy and collaboration to maximise impact. Key discussions included follow-up on previous resolutions, reconciliation of restitution figures, determination of TAT for each agency, a joint data-sharing platform, and the proposal for a 24% penalty.

A major outcome was the joint adoption of a SOP for Missing of Persons cases on 15 March 2025, along with a formal recommendation to the Ministry of Finance to amend the Finance and Accounting Manual to incorporate the 24% penalty. The meeting reinforced professionalism in resolving differences and reaffirmed the three institutions' shared commitment to accountability, transparency, and public trust.

- **Justice Sector:** Under the ongoing implementation of the Justice Sector Strategic Plan-II, the ACC presented a session on Strategic Anti-Corruption Roadmap 2021-2030 on 8 May 2025. The presentation highlighted key reform initiatives undertaken by the ACC, including the mainstreaming of IVS, e-Learning modules, and integrated data-sharing platforms, which have been adopted as Justice Sector Indicators. The session also served as a forum to deliberate on pressing cross-

sectoral issues, reinforcing collaboration among justice partners to improve accessibility, efficiency, and accountability of justice services.

- **CoRE Network:** Recognizing the growing complexity of criminal and emerging threats, the ACC developed the concept of a Coordinated Research and Intelligence (CoRE) Network of Bhutan to strengthen national resilience. To this end, the ACC initiated consultations with core law enforcement agencies like DLO, DRC, RBP, and RMA to explore modalities for collaboration, information-sharing, and joint analysis. These deliberations laid the foundation for a structured inter-agency platform that will enhance proactive detection, analysis, and prevention of threats, thereby reinforcing Bhutan's collective capacity for safeguarding security and integrity.

b) Bilateral Collaborations in Mainstreaming Corruption-Resilient Efforts

- **RAA**: On 20 December 2024, the ACC and RAA signed a renewed MoU, reinforcing its collaboration to build a stronger accountability ecosystem and advance good governance.

- **RCSC**: Recognizing the central role of human resource governance in institutional resilience, the ACC held bilateral meetings with the RCSC to address staffing, organizational structure, the Parent Agency Framework, and competency development. These deliberations paved the way for drafting an MoU to formalize cooperation in HR policies, procedures, professional development, talent management, and mainstreaming integrity in the larger civil service cadre.

- **RBP**: To enhance investigative capacity, the ACC and RBP initiated proposals for specialized training on tools and techniques, including polygraphy, access to advanced digital forensic software, and other technical programs. These initiatives aim to build joint expertise and strengthen evidence-based investigations of corruption and related offences.

- **Gyalpozhing College of Information Technology (GCIT)**: The ACC collaborated with the GCIT to conceptualize a Capstone Project on Call Data Records (CDR) analytics and relationship mapping. This initiative is expected to strengthen the use of technology and data-driven approaches in identifying systemic risks and advancing preventive measures and investigative capacities.

- **Jigme Singye Wangchuck School of Law (JSW School of Law)**: On 29 May 2025, the ACC conducted a structured session with the Class of 2027 cohort, focusing on anti-corruption frameworks and Bhutan's national accountability system. The ACC staff also engaged in a session on psychological safety conducted at the JSW School of Law, which was followed by an in-house activity in the ACC, fostering continued collaboration between the two agencies.

- **Construction Association of Bhutan (CAB)**: On 15 August 2024, the ACC signed an MoU with the CAB to foster integrity in the construction industry. Through targeted interventions, capacity-building workshops, and collective action, the collaboration seeks to reduce vulnerabilities, enhance ethical practices, and reinforce accountability in one of Bhutan's most high-risk sectors.

INTERNATIONAL
NETWORK
Fostering international alliance in the fight against corruption

5.6 INTERNATIONAL NETWORKING

As part of its continued engagement with international and regional anti-corruption initiatives, the ACC worked to strengthen Bhutan's presence in global platforms dedicated to combating corruption. These engagements provided opportunities to exchange knowledge, strategies, and innovative practices to address emerging corruption risks, align national measures with internationally recognized standards, and reinforce its commitment to integrity and good governance. During the reporting period, the ACC undertook the following initiatives:

- **National Anti-Corruption Commission (NACC), Thailand**: The ACC and NACC renewed its MoU on 4 April 2025, reaffirming a long-standing partnership in combating corruption and ensuring continuity of regional cooperation through joint initiatives and institutional exchanges.

- **Australian Federal Police (AFP)**: The ACC, in collaboration with the AFP, conducted a half-day session on 9 August 2024 focused on integrity frameworks and decision-making models, followed by a three-day Investigation Management training program (24-26 February 2025) for officials from the ACC, DLO, DRC, RBP, and RMA. The training strengthened investigative interviewing skills and fostered inter-agency collaboration in tackling financial crimes and corruption.

- **World Bank:** The ACC, in collaboration with the World Bank Country Office, coordinated a workshop on the Country Policy and Institutional Assessment (CPIA) for ACC management and relevant national stakeholders on 29 November 2024. Additionally, the ACC engaged with the experts fielded by the World Bank Country Office in advancing beneficial ownership transparency, providing relevant policy and legal context. In April 2025, the ACC represented Bhutan in the Partnerships for Anti-Corruption Global Forum in Washington, D.C., which further expanded Bhutan's international anti-corruption network.

- **Basel Institute of Governance (BIG)**: The BIG extended technical support in reviewing the draft DAMTSI-BIZ Strategy, drawing on best practices from Thailand, Transparency International, Brazil, Morocco, and Hong Kong.

- **Chandler Institute of Governance (CIG)**: The ACC engaged with the CIG in thematic reviews on the proactive interventions, integrity vetting, integrity assessment, and talent retention & management towards ensuring institutional resilience and sustainability.

- **ADB/OECD Anti-Corruption Initiative (ACI) for Asia and the Pacific**: From 25-27 September 2024, Bhutan hosted the ACI for Asia and the Pacific Regional Seminar in Thimphu under the theme "*Government Incentives for Corporate Anti-Corruption Compliance*". Co-hosted by the ACC, Royal Government of Bhutan, and the ADB/OECD joint secretariat, the seminar underscored the growing recognition of the private sector as a key partner in advancing integrity and fostering sustainable growth. The event brought together 57 participants from 18 ACI member economies, nine international agencies, and over 97 local participants representing 63 national institutions, including CSOs and private sector representatives. Over three days, the program featured a national workshop on Business Integrity, dedicated sessions on incentive frameworks, a meeting of the Public Integrity Network, and a parallel Law Enforcement Network dialogue. 11 economies, alongside Bhutanese public and private sector speakers, shared best practices on aligning sanctions with incentives to encourage corporate compliance. The seminar also facilitated bilateral meetings with key partners from the region, positioning Bhutan as an emerging hub for regional cooperation on business integrity and anti-corruption reforms.

5.7 RESOLUTIONS PASSED AND IMPLEMENTATION STATUS

a) Resolution of 2nd session of Fourth Parliament

1

Compile and submit a comprehensive report, detailing the total number of corruption related judgments passed to date and the current status of restitution and asset recovery in these cases in the next session.

2

Present its review report on the compensation and rehabilitation to the people who are acquitted or whose cases are dismissed by the Court in the next session

The ACC in collaboration with the OAG presented the details on the total number of corruption related judgments passed to date and the current status of restitution to the Good Governance Committee (GGC) and accordingly submitted the report on 27 May 2025.

Since its inception in 2006, the ACC has investigated a total of 482 corruption cases. The total criminal restitution prayed (not including 24% penalty in some cases) for by the ACC amounts to Nu.3,918.980 million. From the total cases investigated, 313 cases were referred for prosecution, leading to a total restitution ordered by the Courts amounting to approximately more than Nu.1,364.430 million. In addition to the criminal restitution sought, the ACC initiated administrative restitution of Nu.60.744 million and realized Nu.11.238 million. While the restitution amount reflects the sum legally established for recovery, the scope of investigation amounted to Nu.5,371.326 million.

The ACC reported to the GGC that the average conviction rate of 84.58% for corruption cases in Bhutan is one of the highest in the region with 93.5% during the last reporting year, indicating the strength of institutional enforcement but also the application of a high evidentiary threshold, consistent with the principle of proof beyond reasonable doubt. Currently, there is no specific law in Bhutan that provides for automatic compensation to individuals who are acquitted after trial. An acquittal in itself does not establish a right to compensation. However, individuals may seek redress if they can demonstrate that their prosecution involved a miscarriage of justice or a failure to adhere to due process and fundamental legal principles, including violations of constitutionally guaranteed rights. In such cases, remedies may be pursued through appropriate legal channels, subject to the thresholds and requirements set by the courts.

SOCIAL
PROGRAMS,
fostering team spirit & camaraderie

b) Resolution of the 34th Session of the National Council

1

In order for law enforcement and regularity agencies to play an effective role in anti-corruption measures, there is an urgent need to provide them with adequate human resources, budget, equipment and financial security.

The MoF responded that under the 13th FYP, the MoF allocated Nu.237.750 million for the ACC and Nu.128.000 million for the RAA, with a portion earmarked for early implementation and key priorities like human resource development. Similarly, the RCSC submitted that the ACC has been offered with flexibility in recruitment and retention through special provisions like Multiple Entry positions.

1.1

In preventing corruption risks in the revenue mobilization, there is a need for systematic reforms to standardize tax policy, enhance transparency and strengthen monitoring mechanisms. Such reviews can help close the loopholes that allow for tax evasion, while aligning Bhutan's tax policies with international standards can prevent further exploitations. It was felt that there is a need for comprehensive reforms to update and streamline Bhutan's regulatory frameworks.

The MoF reported that the Ministry is driving major reforms to modernize Bhutan's tax and customs systems, enhance transparency, and improve revenue administration. Key initiatives include the implementation of Goods and Service Tax, automation through the Bhutan Integrated Taxation System (BITS), and streamlined trade processes through the Electronic Customs Management System and National Single Window.

2

To provide sustained momentum of anti-corruption efforts across all agencies, anti-corruption must be integrated as a key dimension in the National M&E framework. This must be complimented at the agency level KPIs to keep integrity and anti-corruption agenda at the forefront of the governance across agencies.

The Office of Cabinet Affairs and Strategic Coordinations submitted that from the upcoming FY, the AIMS will be integrated as a mandatory component in the key deliverables across all budgetary agencies. Through this, it is expected to assess the agency's integrity maturity level and accordingly allow respective agencies to determine the required intensity and frequency of anti-corruption efforts.

3

Considering the increasing cases of corruption and its nature of complexity, a separate bench for corruption cases be established in the dzongkhag or region based on the corruption case loads.

The Royal Court of Justice submitted that given the limited number of pending cases with only 29 in total, no special benches have been constituted currently. The highest concentration of cases is in Thimphu and Chhukha Dzongkhags, where measures are being taken to fast-track proceedings and ensure timely resolution. The conviction rate of 93.5% for the FY 2023-2024 is indicative of the judiciary's efficiency and commitment to expeditious case disposal.

SECTION
06

CHALLENGES & RECOMMENDATIONS

6.1 Increasing Complexity and Normalization of Corruption

6.2 Poorly Resourced Law Enforcement Agencies (LEAs)

6.3 Poor Attraction and Retention of Talent for Operational Continuity

6.1 INCREASING COMPLEXITY AND NORMALIZATION OF CORRUPTION

Bhutan has made notable progress in building a strong anti-corruption architecture since the establishment of the ACC in 2006. Legal and institutional frameworks have been steadily reinforced, with integrity tools such as the OIP, CoC, AD, CoI, and CRM mainstreamed across agencies. Internationally, Bhutan's standing has improved, with the Corruption Perception Index (CPI) rising from 63/100 in 2012 to 72/100 in 2024. Yet these macro-level gains conceal deeper vulnerabilities. As per the NIA 2022, public perception on corruption rose sharply from 14% in 2012 to 38.30% in 2022, and 39% of citizens now report being "*accustomed to corruption*". The CPI stagnated at 68 for six consecutive years, while the NIA dipped to 7.95 in 2016 before rebounding. This dissonance highlights a critical gap where structural reforms have not translated into behavioural and cultural transformation at the micro level.

Abuse of function including favoritism, nepotism, and patronage constitutes nearly half (45.6%) of corruption reports received by the ACC, followed by embezzlement (20.8%) and bribery (2.5%). Findings from the NIA and NCBS further confirm that citizens routinely rely on personal ties (friendship 22.47%, family 17.33%, orders from superiors 16.04%) to access services, embedding informal influence as the "*normal*" way of navigating bureaucracy. In key sectors such as land, construction, licensing, and health, facilitation payments are often internalized as routine *administrative surcharges*. The Customs scandal at Phuentsholing's Mini Dry Port where 61 individuals, including inspectors, police, and private actors, colluded in bribery, forgery, and money laundering demonstrated how corruption becomes systemic when institutions tolerate loopholes, normalize collusion, and fail to enforce accountability.

The normalization of corruption is further reinforced by rationalization ("*everyone does it*") and socialization (*new officials being inducted into corrupt practices*). Around 45% of citizens consider gift-giving customary rather than corrupt, reframing bribery as cultural reciprocity. The Youth Integrity Assessment (2022) reveals worrying trends, with 50% of youths admitting they would lie to parents or teachers, and 45% stating they would cheat if no harm is perceived. These attitudes reflect ethical blind spots where situational convenience overrides moral principles. Civil servants repeatedly implicated in offenses without deterrent sanctions, combined with poor leadership integrity ratings, perpetuate a culture where corruption is cost-free. Meanwhile, the media plays only a limited corrective role, with just 13% of journalists engaging in analytical reporting and 3% in investigative journalism, allowing misinformation, weak scrutiny, and public cynicism to thrive.

Public confidence in law enforcement agencies and regulatory bodies therefore remains fragile, feeding perceptions that corruption is entrenched in the

system rather than an exception. The convergence of routinized abuse of function, rationalization of informal payments, social acceptance of gift exchanges, weak media scrutiny, and declining youth ethics suggests that corruption is increasingly normalized as part of daily life.

The early signs of normalization, combined with the growing sophistication of corruption, present a systemic challenge that threatens Bhutan's governance, economic stability, and development priorities under the 13th FYP. Financial crime is now facilitated through digital platforms, complex laundering channels, and cross-border transactions that evade domestic oversight. Bhutan's score of 5.51/10 (moderate risk) in the *Anti-Money Laundering Index 2024* and 39/100 (moderate risk) in the *TRACE Bribery Risk Index 2024* underscore vulnerabilities in beneficial ownership transparency, corporate integrity, and financial oversight. If left unchecked, these trends will not only deepen institutional weaknesses but also jeopardize Bhutan's ambitions for stronger investment inflows, economic diversification, and enhanced global competitiveness.

In this regard, the following steps are recommended to reverse the phenomenon:'

- *Enforce stricter sentencing standards, with higher penalties where senior officials are involved, to reinforce deterrence and accountability.*

- *Institutionalize preventive systems by mandating AIMS across all budgetary agencies, with biannual assessments that capture both preventive efforts and actual corruption occurrences.*

- *Introduce an Ethical Leadership Token system, linked to performance-based budgeting and the MaX framework, to incentivize integrity and accountability in leadership.*

- *Strengthen integrity in law enforcement and regulatory agencies, embedding anti-corruption values in their mandates and culture.*

6.2 POORLY RESOURCED LAW ENFORCEMENT AGENCIES (LEAS)

LEAs are the *frontline gatekeepers* of Bhutan's integrity system, entrusted with ensuring compliance, detecting violations, and upholding the rule of law in sensitive domains such as customs, immigration, forestry, revenue, financial regulation, and policing. Yet the rising sophistication of corruption has amplified their vulnerabilities, and their ability to act as credible gatekeepers is increasingly undermined by structural, economic, and institutional weaknesses.

Data from the AD system illustrates this misalignment between responsibility and remuneration. Officials in *Revenue and Customs Services* reported a median annual income of Nu.0.626 million, *Legal, Judiciary & Integrity Promotion Services* Nu.0.620 million, *Immigration Services* Nu.0.391 million, and *Forestry & Environment Protection Services* Nu.0.583 million. Even in *Finance and Audit Services*, the median was only Nu. 0.626 million. When compared against the *Household Consumption and Expenditure Survey 2025*, which estimated average annual household expenditure at Nu.0.811 million in urban areas and Nu.0.556 million in rural areas, it becomes evident that many frontline officials operate barely above subsistence thresholds. For households with dependents or loan obligations, liabilities often exceed Nu.1.000 million, leaving little financial resilience.

This pressure is particularly concerning as LEAs exercise wide discretion from issuing permits, processing clearances, inspecting goods, collecting revenue to enforcing rules, roles that are inherently vulnerable to abuse. Without adequate safeguards, financial strain increases susceptibility to undue influence, bribery, or collusion. Indeed, the ACC data shows that over the last three years, **10.20%** of *corruption reports* qualified for investigation and **27.40%** of *audit irregularities* involved LEAs, underscoring their heightened exposure.

The risks are not theoretical. The ACC's experience shows how compromised gatekeepers can undermine entire systems. The *Phuentsholing Mini Dry Port* scandal revealed collusion between customs inspectors, police, and private actors in bribery and forgery to facilitate cross-border illicit activities. The recent misappropriation of *monument fees* exposed how police, ticketing officials, and guides siphoned over Nu.5.650 million, eroding trust in tourism revenues. Past cases such as the *Samtse mining* collusion showed senior mining inspectors manipulating permits for personal enrichment, while the embezzlement of visa fees at *Paro International Airport* by immigration officials highlighted systemic lapses in immigration revenue handling. These cases demonstrate how weak oversight and fragile internal controls at frontline agencies translate into cascading risks for fiscal stability, environmental sustainability, and public trust.

This concern is corroborated by international benchmarks. Bhutan's World Bank Country Policy and Institutional Assessment (CPIA) score declined from 3.84 in 2022 to **3.75** in 2023, with consistently low ratings for *Business Regulatory Environment (3.5)* and *Efficiency of Revenue Mobilization (3.5)*, both domains tied to LEA performance. The Global Insight Country Risk Ratings show stagnant scores for *Regulatory Quality (0.58)* and *Control of Corruption (0.83)*, while the V-Dem Index places *Public Sector Corrupt Exchanges at 0.77/4* and *Judicial Corruption Decisions at 0.89/4*, reflecting entrenched vulnerabilities.

These findings underscore that the challenge is not limited to isolated misconduct but reflects systemic weaknesses in incentives, accountability, and institutional safeguards. Normalization of collusion and facilitation payments in customs, land, forestry, and immigration undermines deterrence. The erosion of LEA credibility risks positioning agencies like the ACC as punitive enforcers rather than systemic partners, weakening public compliance. More critically, when LEAs themselves falter, the broader anti-corruption ecosystem collapses wherein citizens will not comply with rules that gatekeepers themselves disregard.

Therefore, it is imperative to recognize that LEAs cannot be treated like any other workforce. Given their frontline exposure to corruption risks, they require targeted reinforcement to strengthen resilience and credibility. Some immediate measures include:

- *Integrity-based resourcing, ensuring that liabilities and living costs do not structurally undermine enforcement roles, while holding high-risk positions to the highest standards of accountability.*

- *Specialized capacity-building resources, particularly in digital forensics, risk-based audits, and cross-border enforcement.*

- *Preventive systems, including mandatory integrity vetting and systematic rotation of high-risk posts.*

6.3 POOR ATTRACTION AND RETENTION OF TALENT FOR OPERATIONAL CONTINUITY

While the ACC maintains a young, dynamic, and committed workforce, retaining experienced talent remains a persistent challenge despite the professional allowance introduced in 2010 (*45% of basic pay for investigators and 20% for non-investigative staff*). Since inception, a total of **170** out of 319 staff have exited, **76.71%** through voluntary resignation and 19.86% via lateral transfers, peaking at **20.95%** attrition in 2010 and **17.9%** in FY 2023-2024. Nearly half the current staff (43.28%) have two years or less experience in the ACC, while only 17.91% have served over a decade. Although this youthful profile brings energy and an enterprising mindset, specialist skills remain concentrated in a small senior cohort, and competency progression is slow, with most staff at the Foundational level. The demanding and high-risk nature of anti-corruption work, combined with limited career advancement opportunities, continues to outweigh the incentive value of the allowance, making retention a strategic priority to safeguard institutional continuity.

The need for enhanced institutional capacity has become even greater in light of Bhutan's recent progress in the CPI, where the score rose from 68 in 2023 to **72** in 2024, elevating Bhutan from 25th to **18th** globally. This achievement is a collective accomplishment of all the stakeholders and reflects the strength of Bhutan's integrity systems. However, such progress also raises the level of expectation both domestically and internationally. The global community now views Bhutan as a model of clean governance, and any backsliding would not only erode public trust but also weaken investor confidence, private-sector growth, and competitiveness under the 13th FYP. Sustaining and pushing forward this performance requires consistent institutional capacity, which is inseparable from the ability to attract, nurture, and retain specialized talent in anti-corruption work.

To this end, the ACC will be implementing the talent retention and management proposal, approved by the RCSC. The proposal sets out structured pathways for career progression, recognition of high-performing professionals, and stabilization of institutional expertise. However, its effective rollout, particularly the financial components, requires the support of the Government.

CONCLUSION

CONCLUSION

Corruption remains one of the most persistent governance challenges globally, undermining the rule of law, distorting markets, weakening institutions, and eroding public trust. In today's interconnected world, globalization, rapid technological change, and complex financial systems have amplified both the scale and sophistication of corrupt practices. While open government data, digital contracting platforms, and citizen-led monitoring have advanced transparency, these same shifts have also introduced new vulnerabilities. Cryptocurrencies, opaque beneficial ownership structures, and artificial intelligence tools now enable illicit actors to move funds, conceal transactions, and coordinate across borders with unprecedented speed and anonymity.

This evolving landscape is outpacing traditional safeguards, requiring urgent, intelligence-driven and pre-emptive responses. For Bhutan, these dynamics are no longer distant risks but pressing realities. Economic integration, digital expansion, and foreign investment, vital for national growth, also heighten exposure to more complex and transnational forms of corruption. Unless matched with foresight and resilience, the very forces propelling Bhutan's development could become conduits for illicit activity. This imperative resonates with the Royal Kasho of 2005, which underscored the grave threat corruption poses to national integrity and called for vigilance, foresight, and ethical conduct as foundations of governance.

Looking ahead, the challenge is not only to detect corruption but to de-normalize it by shifting attitudes, strengthening deterrence, and embedding ethical behaviour as a national norm. LEAs must evolve as frontline gatekeepers, ensuring fairness, consistency, and accountability in the application of laws. Integrity promotion must be institutionalized through measurable frameworks such as the AIMS, integrated with performance incentives and budgeting in the 13th FYP. The private sector, as the economy expands, must also be held to higher standards of compliance through initiatives like the DAMTSI-BIZ strategy, with certifications, whistleblower protections, and clear conflict of interest safeguards.

At the same time, sustaining institutional continuity will depend on stabilizing talent, nurturing specialized skills, and ensuring professional incentives that match the demanding nature of anti-corruption work. Integration of business systems across justice institutions viz. ACC, OAG, RBP, and RCoJ will be critical to close procedural gaps, reduce duplication, and enable evidence-based decision-making. The Strategic Anti-Corruption Roadmap 2021-2030 will serve as the anchor for these reforms, broadened to align more closely with the *Diamond Strategy* and national development priorities. Above all, Bhutan's success will rest on collaborative action, leveraging national partnerships and international networks to build collective expertise and strengthen safeguards.

As Bhutan strives toward *Developed Nation* status by 2034 and positions itself as a global hub of innovation and mindful living through the *Gelephu Mindfulness City*, embedding anti-corruption safeguards into every sphere of governance and development becomes not just desirable but indispensable. Integrity must remain the bedrock of progress, ensuring that growth is not only achieved but sustained, trusted, and shared by all.

ANNEXURE

Annexure I: Cases forwarded to the OAG for prosecution from July 2024 – June 2025

Annexure II: Cases under review by the OAG as of June 2025

Annexure III: Cases with Courts as of June 2025

Annexure IV: Judgments rendered from July 2024 - June 2025

ANNEXURE I: CASES FORWARDED TO THE OAG FOR PROSECUTION FROM JULY 2024 – JUNE 2025

SN	Case No	Case Title	Referral Date	Probable Charges
1	27/2023-24	Paro BNB teller fraud case/embezzlement of public fund	3-Jul-2024	– Embezzlement of funds or securities by a public servant under section 52(1) of the ACAB 2011
2	22/2023-24	Suspected bribery involving officials of Samtse Dzongkhag Administration and Phuntshopelri Gewog Administration	16-Sep-2024	– Passive bribery in relation to contract under section 51(1) of the ACAB, 2011 – Commission amounting to abuse of function under section 58(1) of ACAB, 2011. – Passive bribery in relation to contract under section 51(1) of ACAB 2011 – False claim by public servant under section 62 of ACAB 2011 – Participation in an offence under section 75 of ACAB 2011 – Active bribery in relation to contract under section 50 (1) of ACAB 2011
3	33/2023-24	33/2023-24 Fraudulent of Company funds by Regional Manager, Bhutan Industrial Gas, Phuntsholing	15-Jul-2024	– Embezzlement of funds or securities in Private sector
4	DR-14/2023-24	Embezzlement of public fund from farm road const, Haa	28-June-2024	– Embezzlement of funds or securities by the Public Servant under section 52(1) of ACAB 2011
5	01/2024-25	Fraudulent bank guarantee case in Tendu Gewog Filed Office under Tashicholing Branch of Bhutan Development Bank Limited	17-Jan-2025	– Passive bribery of public servant – Commission amounting to abuse of function – Tampering with official documents – Forgery – Participation in an offence – Active bribery of public servant – Solicitation

SN	Case No	Case Title	Referral Date	Probable Charges
6	30/2023-24 (Part II)	Allegation against Executive Engineer, MoIT	29-Jan-2025	– Commission amounting to abuse of functions under section 58(1) of ACAB 2011 – Failure to declare CoI" – Participation in an offence under section 75(1) of the ACAB 2011 – Forgery under section 296 of PCB
7	02/2024-25 (Part I)	Suspected bribery of engineers in Paro Dzongkhag	11-Mar-2025	– Forgery under Section 296 (a) & (d) of PCB – Active bribery of public servant under section 42 of ACAB 2011 – Fronting u/s 285 G, PCB – Passive bribery of public servant u/s. 51 of ACAB – Participation in an offence (conspiracy) u/s. 75 of ACAB – Abuse of privileged information u/s 66 of ACAB – Commission amounting to abuse of function u/s 58 of ACAB – Aiding and Abetting u/s 125 of PCB – Forgery u/s 296 (a) & (d) of PCB
8	02/2024-25 (Part II)	Suspected bribery of engineers in Paro Dzongkhag	11-Mar-2025	– Commission amounting to abuse of function u/s 58 of ACAB – Active bribery of Public servant u/s 42(1) of the ACAB, 2011 – Passive bribery of public servant u/s 43(1) of the ACAB, 2011 – Participation in an offence (Aiding and abetting) u/s. 75 of ACAB 2011
9	02/2024-25 (Part III)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025	– Participation in an offence for conspiracy u/s. 75 of ACAB 2011 – Commission amounting to abuse of function u/s 58 of ACAB – Active bribery in relation to contract u/s 50 of ACAB 2011 – Active trading in influence u/s 54 of ACAB 2011 – Passive bribery of public servant u/s. 51 of ACAB – Deceptive practice u/s 309 (g) of PCB – Forgery u/s 296 of PCB

SN	Case No	Case Title	Referral Date	Probable Charges
10	02/2024-25 (Part IV)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025	– Participation in an offence (Solicitation) u/s. 75 of ACAB 2011 – Participation in an offence for conspiracy u/s. 75 of ACAB 2011 – Participation in an offence (Aiding and abetting) u/s. 75 of ACAB 2011 – Commission amounting to abuse of function u/s 58 of ACAB – Active trading in influence u/s 54 of ACAB 2011 – Passive trading in influence u/s 56 of ACAB – Abuse of privileged information u/s 66 of ACAB – Passive bribery of public servant u/s. 51 of ACAB – Forgery u/s 296 of PCB
11	02/2024-25 (Part V)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025	– Commission amounting to abuse of function u/s 58 of ACAB – Active bribery in relation to contract u/s 50 of ACAB 2011 – Passive bribery in relation to contract u/s. 51 of ACAB – Participation in an offence (Aiding and abetting) u/s. 75 of ACAB 2011
12	02/2024-25 (Part VII)	Investigation into fraudulent practices in the construction of Namgay Khangza Chorten at Tergola, Samar Gewog, Dzongkhag Administration, Haa	11-Mar-2025	– Commission amounting to abuse of function u/s 58 of ACAB – Participation in an offence (Aiding and abetting) u/s. 75 of ACAB 2011
13	07/2024-25	Allegation against Tongmijangsa Gup	07/04/2025	– Encroachment on others' land under Section 128 of the Land Act 2007 – Official misconduct under Section 294 of PCB 2004 – Aiding and Abetting under Section 125 of PCB 2004
14	26/2023-24	Suspected embezzlement of government revenue funds by motor vehicle inspector of Dangan Base office RSTA	31-Jan-2025	– Embezzlement of funds or securities by a public servant under section 52 of the ACAB 2011

SN	Case No	Case Title	Referral Date	Probable Charges
15	21/2023-24	Embezzlement and abuse of function by the Forest official of Khotokha Forest Management Unit, Wangdue	28-Mar-2025	− Omission amounting to Abuse of Function − Embezzlement − False claim of reward − Participation in an offence, solicitation
16	18/2024-25	Misappropriation of Monument Fees at Punakha Dzong	13-Mar-2025	− Abuse of Functions (Section 58 (1)) − Participation in an Offence (Section 75 (1)) − Active Bribery of Public Servants (Section 42 (1) (a)) for those who solicited or offered bribes − Omission amounting to Abuse of Functions (Section 59(1) and Passive Bribery of Public Servants (Sections 43(1) (b) for accepting Bribes.
17	DR 16/2023-2024	Embezzlement at Gomtu BDBL	17-Apr-2025	− Commission amounting to abuse of function u/s 58 of ACAB, 2011 − Embezzlement of funds by public servant u/s 52 of ACAB, 2011 − Deceptive practice u/s 309 of PCB, 2004
18	24/2024-25	Fraudulent practices in the issuance of bank guarantees at BoBL	11-Apr-2025	− Commission amounting to abuse of function under section 58 of ACAB − Participation in an offence under section 75 of ACAB
19	20/2024-25	Embezzlement of fund by former Teller at Mongar BDBL Branch office	17-Jun-2025	− Embezzlement of funds or securities by the public servant under section 52 of ACAB 201 − Forgery of thumb impression on the withdrawal form − Manipulation of balance in the passbook
20	14/2024-25 (Part I)	Misappropriation of funds by the officials of Bumthang Dzongkhag Administration	27-May-2024	− Embezzlement of funds or securities by a public servant under Section 52(1) of ACAB, 2011 − Participation in an offence as per Section 71 (1) of ACAB, 2011

SN	Case No	Case Title	Referral Date	Probable Charges
21	14/2024-25 (Part II)	Misappropriation of funds by the officials of Bumthang Dzongkhag Administration	27-May-2024	– Embezzlement of funds or securities by a public servant under Section 52(1) of ACAB, 2011 – 15 counts of embezzlement of funds or securities by a public servant under Section 52(1) of ACAB, 2011 – 2 counts of embezzlement of funds or securities by a public servant under Section 52(1) of ACAB, 2011 – 2 counts of participation in an offence as per Section 71 (1) of ACAB, 2011 – 15 counts of Participation in an offence as per Section 71 (1) of ACAB, 2011
22	16/2024-25	Unauthorised withdrawal by BDBL Teller at Phuntsholing Branch Office	17-Apr-2025	– Embezzlement of fundus or securities by a Public Servant u/s 52 (1) of the ACAB, 2011
23	36/2023-24 (Part I)	STCBL Referral of prima facie case of corruption	5-May-2025	– Embezzlement of property by public servant under section 53(1) of the ACAB 2011 – Deceptive practice under section 309(f) of PCB, 2004 – Participation in an offence under section 75 of ACAB, 2011 – Omission amounting to abuse of function under section 59 of the ACAB, 2011
24	36/2023-24 (Part II)	STCBL Referral of prima facie case of corruption	5-May-2025	– Embezzlement of property by public servant under section 53(1) of the ACAB 2011 – Participation in an offence under section 75 of ACAB, 201 – Criminal misappropriation of property under section 267 of PCB – Omission amounting to abuse of function under section 59 of the ACAB, 2011

A total of 26 cases merited for prosecution, 20 were forwarded to the OAG by 30 June 2025 while the remaining six cases have been forwarded after July 2025. The first four cases as reflected in the table above were forwarded after July 2024 as reported in the Annual Report 2023-2024.

ANNEXURE II: CASES UNDER REVIEW BY THE OAG AS OF JUNE 2025

SN	Case No.	Case Title	Referral Date
1	09/2019	False allegation against public official (MoWHS Official) in relation to import of Wire Mesh	28-Nov-2019
2	02/2019	Gabion Wall-Bribery involving Rigsar Construction Part II	30-Dec-2019
3	02/2019	Illegal dredging in Amochu Part III	30-Dec-2019
4	02/2021	Investigation into suspected Corrupt activities in the erstwhile Regional Livestock Development Centre, Tshimasham, Chukha	26-Mar-2024
5	12/2021*	Bribery & Tax Evasion involving Customs Official (Part II)	19-08-2022
6	16/2021*	Illegal import of Navy Cut Cigarettes by Former Gojay of Southern Border Duty, Samdrup Jongkhar.	21-Apr-2022
7	04/2022	Suspected Embezzlement by Former Gewog Accountant, Bidung, Tashigang	29-Nov-2022
8	05/2022	Suspected Embezzlement by Former Gewog Accountant, Radhi, Tashigang	29-Nov-2022
9	06/2022	Suspected Embezzlement by Former Gewog Accountant, Phongmey, Tashigang	29-Nov-2022
10	07/2022	Suspected Embezzlement by Former Gewog Accountant, Shongphu, Tashigang	29-Nov-2022
11	21/2022	Embezzlement of Government Fund by Accounts Assistant, Dagana Dzongkhag Administration	13-Apr-2023
12	23/2022	Suspected Embezzlement from Telecom Staff Welfare Fund	6-Jul-2023
13	37/2022	Issuance of forged and unauthorised bank guarantee & Letter of Credit by Assistant Development Officer & Assistant Engineer, RICBL, Thimphu	3-Jul-2023
14	01/2023	Suspected collusion in the procurement of DI pipes and fittings involving M/s Nima Construction	8-Jan-2024
15	02/2023	Embezzlement of Government Fund by Accountant, Regional Immigration Office, Gelephu	12-Jul-2023
16	03/2023	Alleged corruption and fraudulent commercial activities by an Indian National in collusion with few Bhutanese individuals	31-Oct-2023
17	08/2023	Alleged corruption in the contract award of the Regional Revenue & Custom's Base office and its staff quarters at Pugli, Phuntshopelri Gewog under Samtse Dzongkhag	2-Nov-2023
18	03/2023-24	Embezzlement of government fund by Account Assistant, Umling Drungkhag, Sarpang	29-Mar-2024

SN	Case No.	Case Title	Referral Date
19	10/2023-24	Embezzlement of government revenue and manipulation of officials records by LRA of Lhamoizingkha Dungkhag, Dagana	18-Jun-2024
20	12/2023-24	Embezzlement by RBP Accountant Phuentsholing	3-Jan-2024
21	14/2023-24	Centenary Farmer Market	10-Apr-2024
22	17/2023-24	Abuse of function by an employee of Druk Punjab National Bank	1-Jan-2024
23	18/2023-24	Embezzlement of government revenue by Sales Representative, Jomotsangkha, BTL, Samdrup Jonkhar	1-Mar-2024
24	23/2023-24	Misappropriation of government project funds by Accountant under MoICE	24-Jun-2024
25	28/2023-24	Embezzlement of Government funds by Accounts Asst of Dagana Dzongkhag	11-Apr-2024
26	14/2024-25 (Part I)	Misappropriation of funds by the officials of Bumthang Dzongkhag Administration	27-May-2025
27	14/2024-25 (Part II)	Misappropriation of funds by the officials of Bumthang Dzongkhag Administration	27-May-2025
28	16/2024-25	Unauthorised withdrawal by BDBL Teller at Phuntsholing Branch Office	17-Apr-2025
29	18/2024-25	Misappropriation of Monument Fees at Punakha Dzong	13-Mar-2025
30	24/2024-25	Fraudulent practices in the issuance of bank guarantees at BoBL	11-Apr-2025
31	30/2023-24	Allegation against Executive Engineer, MoIT	29-Jan-2025
32	36/2023-24 (Part I)	STCBL Referral of prima facie case of corruption	5-May-2025
33	36/2023-24 (Part II)	STCBL Referral of prima facie case of corruption	5-May-2025
34	21/2023-24	Embezzlement and abuse of function by the Forest official of Khotokha Forest Management Unit, Wangdue	28-Mar-2025
35	22/2023-24	Suspected bribery involving officials of Samtse Dzongkhag Administration and Phuntshopelri Gewog Administration	16-Sep-2024
36	01/2024-25	Fraudulent bank guarantee case in Tendu Gewog Filed Office under Tashicholing Branch of Bhutan Development Bank Limited	17-Jan-2025
37	02/2024-25 (Part I)	Suspected bribery of engineers in Paro Dzongkhag	11-Mar-2025
38	02/2024-25 (Part II)	Suspected bribery of engineers in Paro Dzongkhag	11-Mar-2025
39	02/2024-25 (Part III)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025

SN	Case No.	Case Title	Referral Date
40	02/2024-25 (Part IV)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025
41	02/2024-25 (Part V)	Investigation into corruption engineering cell, Dzongkhag Administration, Paro	11-Mar-2025
42	02/2024-25 (Part VII)	Investigation into fraudulent practices in the construction of Namgay Khangza Chorten at Tergola, Samar Gewog, Dzongkhag Administration, Haa	11-Mar-2025
43	26/2023-24	Suspected embezzlement of government revenue funds by motor vehicle inspector of Dangan Base office RSTA	31-Jan-2025
44	27/2023-24	Paro BNB teller fraud case/embezzlement of public fund by BNB Paro Branch	3-Jul-2024
45	DR 16/2023-24	Embezzlement at Gomtu BDBL	17-Apr-2025
46	20/2024-25	Embezzlement of fund by former Teller at Mongar BDBL Branch office	17-Jun-2025
47	07/2024-25	Allegation against the former Tongmijangsa Gup	07-Apr-2025
48	02/2022	Suspected corruption and mismanagement in Northern- East-West Highway Construction (Nubding-Dung Dung Nelsa & Trongsa-Urmo)	10-Aug-2022
49	08/2019	Embezzlement of stamps by Staff of Philately Division, Bhutan Postal Corporation Limited, Thimphu	11-Oct-2021

ANNEXURE III: CASES WITH COURTS AS OF JUNE 2025

SN	Case No.	Case Title	Referral Date	Jurisdiction	Initial Registration with Court	Status
1	26/2017	Fraud and corruption in GoI funded construction project in CST, Phuntsholing	12-Jan-2017	Phuentsholing Drungkhag Court	14-12-2020	Under trial
2	12/2021	Tax Evasion & Bribery involving importer & Customs Official (Part I)	19-08-2022	Phuentsholing Drungkhag Court	14-06-2023	Under trial
3	12/2021	Bribery involving Customs Inspector & Others (Part III)	19-08-2022	Phuentsholing Drungkhag Court	2-Jun-2024	Under trial
4	12/2021	Money Laundering by Custom Official & Others (Part IV)	19-08-2022	Phuentsholing Drungkhag Court	2-Jun-2024	Under trial
5	12/2021	Tax Evasion & Bribery of Custom Inspectors & Others (Part VI)	19-08-2022	Phuentsholing Drungkhag Court	4-Oct-2023	Under trial
6	12/2021	Tax Evasion & Bribery of Custom Officials & Importer (Part VII)	19-08-2022	Phuentsholing Drungkhag Court	4-Oct-2023	Under trial
7	19/2021	Misuse of power by Shelnga Bjemi Gup, Punakha	9-Jul-2021	OGZ**		Under Review
8	03/2022	Embezzlement of government fund by the immigration officials at regional office Phuentsholing	8-Nov-2022	Phuentsholing Drungkhag Court	4-Jan-2024	Under trial
9	05/2023-24	Alleged misconduct against Mr. Sonam Nyeanda, former GM of Eicher Division, STCBL	27-Nov-2023	Phuentsholing Drungkhag Court	19-Sep-2024	under Trial
10	13/2023-24	Suspected embezzlement of revenues generated from the sales of paper vouchers by the employees of Lhamoizhingkha Cost Center, BTL	10-Nov-2023	Lhamoizingkha Drungkhag Court	06-Dec-2023	Under Trial
11	04/2023-24	Embezzlement of funds involving Mr. Namgyel Phuntsho, former Asst Accountant of Finance Division, BICMA	28-Dec-2023	Thimphu District Court	19-Feb-2025	Under Trial

12	12/2022	Suspected corrupt practices by Tshewang Tashi, Board Director, National Cottage and Small Industry Development Bank Ltd. (NCSIDBL)-Part II-Alpine Kitchen (CoI)	5-Aug-2022	Supreme Court	15-May-2025	Under Trial
13	41/2022	Corruption and fraud in insurance policy and claim by Mr.Leki & Others.	10-Mar-2023	Thimphu District Court	09-Jan-2025	Under Trial
14	07/2020	Tax Evasion by Mr. Ugyen Norbu Jamyang, Proprietor, Ugyen Auto, Thimphu	8-Nov-2021	High Court	15-Feb-2022	Under Trial
15	13/2022	Opening of a private account by RCDC Staff in the name of the agency.	17-Oct-2022	High Court	4-Sep-2023	Under Trial
16	15/2023-24	Embezzlement of sales revenue by Mrs. Sonam Tshomo, Sales Representative, Profit Centre of BTL, Mongar	10-Jan-2024	Mongar Court	23-Dec-2024	Under Trial
17	22/2019	Collusion between Thimphu Thromde and BBIPL	7-Oct-2019	High Court	08-Nov-2021	Under Trial
18	15/2021	Suspected embezzlement and other corrupt offense vis-a-vis Foreign Aid at National Environment Commission Secretariat , Thimphu	24-May-2022	High Court	14-Jul-2023	Under Trial

ANNEXURE IV: JUDGMENTS RENDERED FROM JULY 2024 - JUNE 2025

SN	Case Title	Initial Registration	Judgement Date	Court of Adjudication	Status
1	Embezzlement of Government revenue at RSTA, Regional Office, Gelephu.	04-03-2021	29-08-2024	Supreme Court	Deferred
2	Embezzlement of Gewog Environment Conservation Committee Fund (GECCF) by Korphu Gup, Trongsa	27-04-2023	28-11-2024	Supreme Court	Convicted
3	Suspected corrupt practices by Tshewang Tashi, Board Director, National Cottage and Small Industry Development Bank Ltd. (NCSIDBL)-Part I-Rewa Food Processing	28-04-2023	30-04-2025	High court	Convicted
4	Suspected corrupt practices by Tshewang Tashi, Board Director, National Cottage and Small Industry Development Bank Ltd. (NCSIDBL)-Part II-Alpine Kitchen (CoI)	28-04-2023	30-04-2025	High court	Acquitted
5	Suspected corrupt practices by Tshewang Tashi, Board Director, National Cottage and Small Industry Development Bank Ltd. (NCSIDBL)-Part III-Facemask	30-04-2024	03/12/2024	Paro	Acquitted
6	Embezzlement of government revenue by Mr. Jigme Wangchuk, Accounts Assistant, Dzongkhag Administration, Zhemgang	19-07-2024	26-08-2024	Zhemgang	Convicted
7	Investigation into suspected bribery involving Mr.Phajo Nidup & BoBL Officials, Pling (Part I)	07-07-2023	21-05-2025	Supreme Court	Convicted/ acquitted
8	Investigation into suspected bribery involving Mr.Phajo Nidup & BoBL Officials (Baazer Branch) (Part II)	09-01-2023	21-05-2025	Supreme Court	Convicted
9	Investigation into suspected bribery involving Mr.Phajo Nidup & BoBL officials, Gedu branch	23-05-2023	16-10-2024	High Court	Convicted

10	Investigation into suspected bribery involving Mr.Phajo Nidup & Thromde Officials	24-04-2023	21-05-2025	Supreme Court	Convicted
11	Suspected bribery of officials of BDBL, Branch Office, P/ling in the loan fraud scheme of Phajo Nidup	09-11-2023	21-05-2025	Supreme Court	Convicted
12	Investigation into suspected bribery involving Mr.Phajo Nidup & RSTA Officials	05-03-2023	21-05-2025	Supreme Court	Convicted
13	Embezzlement at Bhutan Helicopter Services Ltd.	19-06-2024	16-01-2025	Supreme Court	Convicted
14	Procurement Corruption by Procurement Officer at Dagana Dzongkhag Administration	13-09-2023	25-10-2024	Dagana	Convicted
15	Abuse of function by Deputy Chief Livestock Officer, Dagana (Reassigned)	03-06-2023	17-04-2025	Supreme Court	Convicted
16	Land encroachment by Mr Jattu Drukpa at Lungtenphu	14-03-2023	25-10-2024	Thimphu	Deferred
17	Foreign Worker Data Manipulation involving Senior ICT Officer, MoLHR	01-01-2023	28-03-2025	Thimphu	Convicted
18	Alleged embezzlement in foreign aid in NECS	14-07-2024	11-04-2025	Thimphu	Convicted/ acquitted
19	Allegation against late lham Tenzin, former regional coordinator DGM, Samtse Region	06-09-2024	29-04-2025	Samtse	Convicted
20	Investigation into alleged bribery and tax evasion involving Palden Drukpa of RRCO, importers Eden, Tshering Yangchen and Indian supplier Ankit	10-04-2023	17-04-2025	Phuentsholing Court	convicted
21	Opening of private account by RCDC staff in the name of agency	17-10-2022	30-04-2025	Thimphu	Acquitted
22	Collusion between Thimphu Thromde and BBIPL	18-11-2021	09-05-2025	Thimphu	Convicted
23	Embezzlement of government fund by late Tej Bahadur Sunwar, Asstt Accountant, Dagana Dzongkhag	05-08-2024	13-02-2025	High Court	Convicted
24	Corruption in the procurement of works at Thimphu Thromde Manholes	13-10-2021	9-Jun-2025	Supreme Court	Convicted

25	Suspected embezzlement by Pema Yangchen, BNBL	17-03-2024	09-05-2025	Paro	Deferred
26	Suspected bribery involving OAG Prosecutor	22-05-2023	23-04-2025	Supreme Court	Convicted
27	Embezzlement of fuel by Tshering Dorji in collusion with Tenzin Yoezer	14-11-2024	25-12-2024	Trongsa	Convicted
28	Phajo Nidup Bank Fraud RICBL	31-10-2023	21-05-2025	Supreme Court	Convicted
29	Phajo Nidup Bank Fraud BNBL	09-08-2023	27-01-2025	Supreme Court	Convicted
30	Investigation into suspected bribery involving Mr.Phajo Nidup & Others (Pling Thromde)	27-04-2023	21-05-2025	Supreme Court	Convicted
31	Suspected abuse of functions and bribery of RBP officials by Mr. Phajo Nidup	08-09-2023	21-05-2025	Supreme Court	Convicted/ acquitted
32	Investigation on deceptive practices & collusion involving Phajo Nidup & DPNBL officials	14-11-2023	21-05-2025	Supreme Court	Convicted
33	Tax evasion by Ugyen Auto	15-02-2022	08-04-2025	Thimphu	Acquitted
34	Bribery case involving Sr. Attorney, Office of the Attorney General, Thimphu	29-May-2022	16-Dec-2024	Thimphu	Convicted

'ARE YOU READY TO SHOULDER THIS RESPONSIBILITY WITH ME?'
-His Majesty The King, 17 December 2023

དུས་བཅུན་ on the 18th Foundation Day, 31 December 2023

integrity
Dedication
transparency
teamwork
Grit
Fortitude
humility
fearlessness
professionalism
expediency   empathy
credibility
Accountability
Values   creativity   **Courage**
result-driven
impartiality   **Leadership**
Perseverance   tenacity of purpose