ASSESSING THE ROLE OF ANTI CORRUPTION LEGAL SYSTEMS IN FOSTERING INVESTMENT IN UGANDA

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ABSTRACT

Corruption remains a significant obstacle to investment in Uganda, despite the government's efforts to combat it. This study assesses the role of anti-corruption legal systems in fostering investment in Uganda, highlighting the definitions, types, and effects of corruption on investment. It also examines the anti-corruption measures taken by the government, including domestic, regional, and international instruments. The study found that anti-corruption legal systems can foster investment by reducing risks, criminalizing and sanctioning corruption, and ensuring redress for victims. However, more work needs to be done to address the root causes of corruption and ensure effective enforcement. The study recommends a multifaceted approach to combating corruption, including strengthening institutions, improving transparency and accountability, and promoting citizen engagement. By fostering a conducive investment environment, Uganda can attract more investment, promote economic growth, and achieve sustainable development.

A. INTRODUCTION

Corruption has been defined by the World Bank as the misuse of public office for private gain[1]. Transparency International has also defined it as the abuse of entrusted power for private gains[2]. However, in recent years, this definition has become debatable, as there have been major corruption cases in the private sector. Thus, in February 2006, the heads of the African Development Bank, Asian Development Bank, European Bank for Reconstruction and Development, European Investment Bank, Inter-American Development Bank, International Monetary Fund, and World Bank agreed on the need to standardize their definition of corruption They stated that a corrupt practice is the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to improperly influence the actions of another

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1 *World Bank*, Anti-Corruption Fact Sheet, February 19, 2020, available at https://www.worldbank.org/en/news/factsheet/2020/02/19/anticorruption-fact-sheet accessed on 28/06/2024.

2 *Transparency International*, What is Corruption?, n.d., available at https://www.transparency.org/en/what-is-corruption (accessed on 28th June, 2024).

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party[3]. The Uganda Anti-Corruption Act of 2009 codified this as it defines corruption in terms of various manifestations, such as bribery, solicitations, extortion, embezzlement, diversion of public resources, causing financial loss, false/fraudulent accounting, forgery, illicit enrichment, influence peddling/conflict of interest, nepotism, and favoritism, among others[4]. There are various theories related to corruption, including political theory, economic theory, and social theory. The political theory states that corruption is a result of the non-accountable and non-democratic nature of the political machinery/leadership. The economic theory states that a public servant is an agent of the government employed to further its interest as the principle. It recognizes that when there is a conflict of interest, corruption occurs when the agent pursues his private interests at the expense of the public interest. On the other hand, the social theory alludes that corruption occurs when market forces are unable to efficiently allocate resources and ensure that resources are allocated to the highest bidder[5]. There are three types of corruption. (1) *Petty corruption,* which refers to the use of a public position for private gains in the course of performing routine public services by front-line elected and/or appointed officials, including the police, civil servants, customs officers, tax officials, etc. (2) *Grand corruption,* which occurs when the public policy-making process, its design and implementation, plus its agents—appointed/elected—are compromised (state capture). Grand corruption is most common in privatization, public sector procurement, and licensing processes. (3) *Systemic corruption, which* occurs when both petty and grand corruption exist. Systemic corruption is the greatest obstacle to development effectiveness since it involves venality in public service delivery and in public policy making while increasing the cost of doing business[6]. The Transparency International corruption perceptions index ranks 180 countries and territories around the globe by their perceived levels of public sector corruption, scoring them on a scale of 0 (highly corrupt) to 100 (very clean). In 2023, Uganda scored 26 points, which indicates that it is a highly corrupt country[7]

B. CORRUPTION AND INVESTMENT.

Investment is a macroeconomic variable that works as the engine for sustainable economic growth, economic development, sustainable development, and overall production level

3 *Thai Khi V*., Measuring Losses to Public Procurement Corruption: The Uganda Case, in: eds. R. Gomez and Khi V. Thai, Public Procurement Reform: Lessons from Experience, 2008, p.1069.

4 The Anti-Corruption Act Cap. 116 of Uganda.

5 *Williams-Elegbe Sope*, Fighting Corruption in Public Procurement: A Comparative Analysis of Disqualification or Debarment Measures, Portland, 2012, p.9 – 12.

6 Section 2(2.4) *African Development Bank*, Guidelines for Preventing and Combating Corruption and Fraud in Bank Group Operations (2004) available at https://www.afdb.org/fileadmin/uploads/afdb/Documents/Policy-Documents/15-EN-Guidelines_for_preventing_and_combating_corruption_and_fraud.pdf (accessed on 28th June, 2024).

7 *Transparency International*, 2023 Corruption Perceptions Index, available at https://www.transparency.org/en/cpi/2023 (accessed on 30th June 2024).

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economy in the country[8]. The Inspector General of Government report on the cost of corruption reveals that Uganda loses approximately $18.5 billion in foreign direct investment (FDI) annually due to widespread corruption. This alarming trend discourages investors, undermining the country's economic growth and development.[9]. Corruption in Uganda increases business costs for foreign investors, who pay bribes to navigate complex processes. Lengthy registrations, licensing requirements, taxation issues, and bureaucratic red tape fuel this corruption[10]. Corruption affects the competitive environment in host economies and, in turn, affects FDI attraction. This is because it reduces the quality of competition and government intervention in the market. In turn, FDI is jeopardized due to the unfriendly environment and lack of protection by the host state[11]. Corruption protects domestic investments against FDI and, in turn, reduces FDI attraction in host countries. Corruption benefits domestic investors by giving them market priority and imposing higher costs on foreign investors. Foreign investors face increased expenses due to bribes and bureaucratic hurdles, while domestic investors, familiar with standard procedures, avoid these obstacles. This unfair advantage disadvantages FDI, creating an uneven playing field.[12]. Corruption increases the risk of doing business and decreases the confidence level of foreign investors[13]. This is because a country with poor governance and high corruption levels leaves investors with uncertainty about whether their investment will thrive. Such risks cause a loss of confidence in the state, hence reducing investment.

C. SCENARIOS

I. The Equity Bank Fraud incidence.

In April 2024, Ugandan police arrested Kenneth Onyango, Equity Bank Uganda's former Executive Director for Commercial Banking, amid investigations into alleged stock loans and agent float financing fraud. The scandal involves $16 million (62 billion Uganda shillings) in losses, mainly from unsecured loans to unqualified individuals. Several Equity Bank staff members were also arrested in connection with the alleged money laundering

8 *Zaki Najibulla.* The Impacts of Corruption on Attracting Foreign Direct Investment, EUREKA: Social and Humanities, no. 4, (2020), p.10.

9 *Fazekas, Mihály, Isabelle Adam, and Olena Nikulina*, Study on the Cost of Corruption in Uganda, Inspectorate of Government Uganda, Kampala, 2021, P.9.

10 *Najibullah*, P.12.

11 Ibid 9.

12 Ibid 9.

13 *Onyinye Udenze*, The Effect Of Corruption On Foreign Direct Investments In Developing Countries, The Park Place Economist, Vol. 22, 2014, p. 87–9. Available at: http://digitalcommons.iwu.edu/parkplace/vol22/iss1/17 (accessed on 30th June 2024).

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and fraudulent accounting practices. The Bank of Uganda has ordered a forensic audit, reassuring depositors of their funds' safety.[14].

II. Witness Global Report.

In 2017, Witness Global investigated and made a report on corruption in the mining sector. An investigation into Uganda's Directorate of Geological Survey and Mines (DGSM) uncovered widespread corruption, revealing that obtaining licenses required bribing specific officials. Alarmingly, some staff had formed their own company to acquire licenses for third parties, creating a clear conflict of interest[15]. Corruption in Uganda's mining sector perpetuates unfair advantages, favoring well-connected companies over qualified ones, and ultimately exploiting citizens and the environment. This corruption also deters foreign investment and hinders the country's development[16]. The manifestation of this kind of corruption is seen in the case of *Nilefos Minerals Limited v Attorney General & Anor*, which concerns the exploration license for the Sukulu phosphate mining, awarded to the Chinese mining company Guangzhou Dong Song by the DGSM almost three months before the license to the previous owner, Nilefos Mineral Limited, expired. Both Nilefos and Frontier Exploration Ltd., which had tried to apply for a license at the same time as Guangzhou, claimed that there were irregularities and illegality in the licensing process, as partially confirmed by Justice Stephen Musota[17].

III. Canadian Investors fraud incident.

In 2023, an incident was reported to the State House Anti-Corruption Unit by Canadian investors, Tunji Johnson and Kent reported fraudulent activities at Uganda's Parliament building on March 16, 2022, resulting in a $50,000 loss (187 million Uganda shillings). The scam involved a solar energy project advertised by the President's office, National Resistance Movement party, and Nile Link Limited. Canadian company International PV

14 *Daily Monitor*, Former Equity Boss Linked to Bank Fraud Arrested in Uganda, The East African, April 12, 2024, available at https://www.theeastafrican.co.ke/tea/business/former-equity-boss-linked-to-bank-fraud-arrested-in- uganda-4588122 (accessed on 30th June 2024).

15 *Global Witness,* Undermined: How Corruption, Mismanagement and Political Influence Is Undermining Investment in Uganda's Mining Sector and Threatening People and Environment, Global Witness, 2017, P.2 available at file:///C:/Users/HP/Downloads/Undermined_briefing_paper.pdf accessed on 30th June 2024.

16 *Global Witness,* Uganda: Undermined, Global Witness available at https://www.globalwitness.org/en/campaigns/oil-gas-and-mining/uganda-undermined/ (accessed on 30th June 2024).

17 *Nilefos Minerals Limited v Attorney General & Anor* (MISC. CAUSE No. 0184 OF 2014) [2016] UGHCCD
10 (29 February 2016).

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Development Co. attempted to establish a Ugandan sister company for the project but discovered the licensing and establishment process was a sham, leading to financial losses.[18].

IV. African Panther Resources Uganda (APRU) incident,

African Panther AG's subsidiary, APRU, secured an exploration license in just three days, raising suspicions of irregularities. Former license holder First Mining Uganda alleged "underhand dealings" between APRU and government officials, but later dropped the complaint. Further fueling concerns, APRU underwent significant management and ownership changes around the licensing period, including transferring ownership to two inexperienced Londoners.[19].

V. Political interference and corrupt government technocrats approve or conceal contracts that should be annulled affects Investment.

In September 2019, President Museveni unexpectedly halted the tendering process for the Kampala-Jinja Expressway, a $1.2 billion public-private partnership project, and instead invited China Railway 17th Bureau Group Company (CR17th) to negotiate the contract. This move raised eyebrows, as CR17th's subsidiaries had previously been disqualified from the tendering process due to serious abuses of tender requirements. Despite this, President Museveni directed the Minister for Works to award the contract to CR17th, citing the company's availability of over $1 billion in funding. The sudden intervention sparked concerns about transparency, accountability, and the potential for corruption in Uganda's infrastructure development projects.[20]

18 *Dailly Monitor*, How Canadian Investors Were Conned by Ugandans at Parliament, The Citizen, June 30, 2024 available at https://www.thecitizen.co.tz/tanzania/news/east-africa-news/how-canadian-investors-were-conned-by-ugandans-at-parliament-4667118#story (accessed on 30th June 2024).

19 *Pasculli Lorenzo*, Foreign Investments, the Rule of Corrupted Law and Transnational Systemic Corruption in Uganda's Mineral Sector, in: ed.Rafael Leal-Arcas, International Trade, Investment and the Rule of Law, 84–109, Chisinau, 2020, p.95 – 6 available at https://www.researchgate.net/publication/344125975_Foreign_Investments_the_Rule_of_Corrupted_Law_and_Transnational_Systemic_Corruption_in_Uganda%27s_Mineral_Sector?enrichId=rgreq-30e839b444bcf1c54897543e3f69c502-xxx&enrichSource=Y292ZXJQYWdlOzM0NDEyNTk3NTtBUzo5MzIzOTU2MzMwODIzNjhAMTU5OTMxMTg1MDIxMw%3D%3D&el=1_x_2&_esc=publicationCoverPdf (accessed on 30th June 2024).

20 *F. Musisi*, Museveni Directs on Shs4 trillion Jinja Expressway Tender, Daily Monitor (Sept. 26, 2019), https://www.monitor.co.ug/News/National/Museveni-directs-on-Shs4-trillion-Jinja-Expressway-tender/688334-5287304-xwi8yt/index.html (accessed on 3rd September, 2024).

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D. Anti-Corruption Measures

The measures or efforts taken by the government of Uganda to fight corruption that affects investment range from national laws and guidelines to international and multilateral binding instruments as follows[21].

I. Domestic Measures

The measures Uganda has taken to prevent corruption and thus promote investment are well established in the legal and institutional framework. Uganda has adequate laws to combat corruption and an interlocking web of anti-corruption institutions[22].

1. Legal Framework

Uganda has established a strong legal framework to support the fight against corruption, and most of the laws have been developed under the National Resistance Movement Government. The Laws include the Constitution of the Republic of Uganda (1995); the Inspectorate of Government Act, 2002; the Leadership Code Act, 2002; the National Audit Act, 2008; the Anti-Corruption Act, 2009; the Whistleblowers Protection Act, 2010; the Anti-Money Laundering Act, 2013; the Public Finance Management Act, 2015; the Penal Code Act; and the Access to Information Act. These laws support the detection, investigation, and prosecution of corruption crimes in Uganda.

2. Guidelines.

a. Zero Tolerance to Corruption Policy 2019[23].

This Policy envisions a "Developed**,** Corrupt Free Society". Uganda is committed to creating a corruption-free society through a multifaceted approach. The country aims to establish effective anti-corruption measures, strengthen institutions, enhance coordination among government agencies and civil society, and foster a culture of integrity and transparency. Encouraging public participation, especially among youth, and promoting individual commitment to reject corruption are also key objectives. Aligning with Vision 2040, Uganda

21 *Williams-Elegbe,* 2012, p.13.

22 *United States Department of State,* 2023 Investment Climate Statements: Uganda, Available at https://www.state.gov/reports/2023-investment-climate-statements/uganda/ (accessed on 30th June, 2024).

23 *Government of Uganda,* The Zero-Tolerance to Corruption Policy, 2019, Uganda, 2019. Available at https://www.igg.go.ug/media/files/publications/Zero_Tolerance_to_Corruption_Policy_ZTP_2019.pdf (accessed on 30th June 30, 2024).

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seeks to transform into a modern, democratic nation, where accountability and transparency thrive, and corruption is eradicated.[24]

3. Institutional Framework

The government has established an elaborate institutional framework to ensure the efficient and effective utilization of public resources and to promote transparency and accountability. These institutions further prevent, prosecute and punish all acts of corruption in Uganda. The Institutions include the Inspectorate of Government, the Office of the Director of Public Prosecutions, the Office of the Auditor General, the Internal Auditor General, the Accountant General, the Criminal Investigations Directorate of the Uganda Police Force, the Anti-Corruption Division of the High Court, the Internal Security Organization, the State House Anti-Corruption Unit, the State House Health Monitoring Unit, the Public Procurement and Disposal of Public Assets Authority, the Financial Intelligence Authority, and others. The anti-corruption agencies are coordinated under the Inter Agency Forum, which is chaired by the Minister of State for Ethics and Integrity.[25]

II. Regional Measures.

1. East African Community (EAC).

Uganda is a founding member of the EAC.[26] The EAC is governed by the Fundamental Principals of the Community, which guarantee the rule of law, accountability, transparency and social justice.[27] To achieve this goal, the East African Community Protocol on Good Governance[28] requires states to establish measures to combat corruption and protect whistle blowers. It further requires states to formulate policies and enact laws that promote and provide a conducive environment for investment.[29]

24 *National Anti-Corruption Strategy (NACS) 2019/20–2023/2024,* Uganda, 2019., p.iv Available at https://www.igg.go.ug/media/files/publications/National_Anti-Corruption_Strategy_NACS_2019.pdf (accessed on 30th June 2024).

25 *Annex 1 of the Government of Uganda,* The Zero-Tolerance to Corruption Policy, 2019., Uganda p. 59. Available at https://www.igg.go.ug/media/files/publications/Zero_Tolerance_to_Corruption_Policy_ZTP_2019.pdf (accessed on 30th June 2024).

26 The Treaty Establishing the EAC was signed on 30th November 1999, came into force on 7th July 2000 following ratification by original subscribers that is Uganda, Kenya and Tanzania.

27 Article 6 (d), Treaty Establishing the East African Community.

28 East African Community Protocol on Good Governance, November 20, 2009.

29 Article 11(2)(c) of the East African Community Protocol on Good Governance, November 20, 2009.

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2. The East African Association of Anti-Corruption Authorities (EAAACA) Public Awareness and Communication Strategy.

The anti-corruption initiative was established to galvanize public support in the fight against corruption, transforming attitudes and perceptions through education and awareness. Its objectives include mobilizing citizens to reject corruption, disseminating knowledge on its societal impact, and promoting a culture of integrity. Through public education and community engagement, the initiative aims to empower individuals to demand accountability, report corruption, and foster a corrupt-free society, ultimately improving governance and quality of life.[30] Through this platform a favorable environment for investment is created.

3. African Union (AU).

Uganda is a state party to the African Union. The AU enacted the African Union Convention on Preventing and Combating Corruption, which entered into force on 5th August 2006.[31] The African Union's anti-corruption convention represents a landmark commitment to combating corruption across the continent. By criminalizing corruption, promoting cooperation, and mandating legislative measures, this agreement seeks to eradicate the vice that hinders Africa's economic growth and development. Through its implementation, African nations can ensure accountability, transparency, and good governance, creating a conducive environment for investment, innovation, and prosperity. Effective enforcement of this convention holds the key to unlocking Africa's full potential.

II. International measures

1. United Nations Convention against Corruption (UNCAC)

Uganda signed and ratified the UNCAC.[32] The convention tackles corruption through four key pillars: prevention, criminalization, international cooperation, and asset recovery. By ratifying UNCAC, countries commit to maintaining a professional civil service, transparent procurement systems, and judicial integrity.[33]. This commitment fosters trust, confidence, and security among investors, familiar with governing laws promoting accountability and

30 East African Association of Anti-Corruption Authorities, Public Awareness and Communication Strategy. Kampala: East African Association of Anti-Corruption Authorities, 2014. Available at https://www.eaaaca.com/sites/default/files/media-documents/2018/05/EAAACA-Communication-and-public-awareness-STRATEGY-2014_0.pdf (accessed on 30th June 2024).

31 *African Union*, African Union Convention on Preventing and Combating Corruption. Maputo, Mozambique: African Union, July 11, 2003.

32 Uganda signed the convention on 9th December 2003 in Merida, Mexico and deposited its instruments of ratification with the Secretary-General on 9th September 2004.

33 *Williams-Elegbe, Sope*, 2012, p.23 – 4.

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good governance. As a global standard, UNCAC helps nations combat corruption, promote economic development, and ensure stability, thus promoting investment.

2. International Financial Institutions (World Bank and IMF).

The World Bank plays a crucial role in understanding the nexus between poor governance, corruption, and economic growth. Research reveals that weak governance and corruption have far-reaching consequences, including lower literacy rates, higher infant mortality, and diminished benefits from (FDI). Moreover, corruption hinders local businesses from collaborating with multinational companies. Leveraging its expertise and data, the World Bank develops methodologies to design effective reform processes, enhancing the stability of a country's investment climate and fostering an environment conducive to sustainable economic growth and development.[34] The World Bank's assistance comes with strategic conditions, promoting good governance and investment-friendly policies in recipient countries. For nations like Uganda and across Africa, meeting these requirements unlocks benefits: improved business environments, increased foreign investment, and sustained economic growth.

J. How Anti-corruption systems foster Investment.

I. Reduce the risk of businesses colluding with or being extorted by dishonest officials.[35]

Effective rule enforcement employs a range of anti-corruption instruments to combat administrative corruption, including codes of conduct, robust human resource management, conflict of interest policies, whistleblower protection, proactive transparency, asset declarations, internal controls, and audits. These measures foster a culture of integrity, deter corrupt practices, ensure accountability, and build investor confidence in government and rule of law.[36]. As a result, investors are more likely to invest, driving investment growth in the country.

II. Criminalizing and sanctioning reduce private sector corruption.

Laws such as the Penal Code Act and Anti-Corruption Act criminalize various forms of corruption, including fraud, bribery, money laundering, embezzlement, and conflicts of

34 *Organization for Economic Co-operation and Development,* Corruption and Economic Growth, Issue Paper, G20 Anti-Corruption Working Group, 2019, P.35 available at https://www.oecd.org/g20/topics/anti-corruption/Issue-Paper-Corruption-and-Economic-Growth.pdf (accessed on 30th June 2024).

35 *Jenkins, Matthew,* Corruption and the Financing for Development Agenda, Transparency International, 2024. P.15 available at file:///C:/Users/HP/Downloads/Corruption-and-the-Financing-for-Development-agenda_PR.pdf (accessed on 30th June 2023).

36 Ibid 33.

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interest. These statutes establish corruption as a punishable offense, serving as a deterrent to potential perpetrators. By enforcing these laws, governments can effectively reduce corruption, foster a culture of accountability, and bolster investor confidence in the rule of law and governance. This, in turn, creates a favorable business environment, encouraging domestic and foreign investment.[37]

III. Enforcement institutions ensure redress for victims of corruption, increasing investment.

Effective enforcement institutions, comprising the Anti-Corruption Court, Leadership Code Tribunal, Inspectorate of Government, and Director of Public Prosecution, provide critical redress for victims of corruption. Through rigorous investigations and prosecutions, these bodies hold perpetrators accountable, ensuring justice and upholding the rule of law. This robust framework safeguards investors' rights, fosters a secure business environment, and boosts confidence in government's anti-corruption efforts. Consequently, investors are attracted to the country thus driving increased investment.

K. RECOMMENDATIONS.

I. Digitalizing Services.

In Uganda, public servants often demand extra payments for services, undermining trust. To combat corruption, anti-corruption agencies should benchmark developed countries' best practices, leveraging advanced technology to minimize public servant-public contact. Digitalizing service delivery platforms, online payment and application systems, automated processes for permits and licenses, and public service portals can reduce corruption opportunities. This enhances transparency, efficiency, and public trust, attracting foreign investment and fostering economic growth. By adopting modern, transparent systems, Uganda can align with global standards, build a corruption-free reputation, and promote accountability, efficiency, and investment.

II. Improving legislative bans and ensures enforcement of sanctions against corrupt practices.

Corruption thrives in countries where it's normalized and tolerated, with low risks of detection and punishment. Lenient penalties further exacerbate the issue, allowing corrupt practices to flourish. To combat corruption effectively, governments must reassess measures such as monetary fines, which often lose deterrent value due to inflation. Adjusting fines to reflect current economic realities helps maintain punitive impact. Strengthening laws, increasing transparency and accountability, protecting whistleblowers, and ensuring swift

37 Ibid 33.

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and severe punishment are crucial.[38] The law should be amended to ensure that those that embezzle fund pay all the money take ad also serve their sentence. This is because most of these criminals serve their jail term and return to enjoy the billions of monies stolen leaving investors in big financial losses. A combination of high detection likelihood, severe penalties, transparency, and public awareness can create an environment where corruption is no longer tolerated, and the rule of law prevails.

III. Improve protection of whistle blowers.

The law on the protection of whistle blowers does not provide for protection of persons who have disclosed their identity as whistleblowers.[39] There is a growing trend of investigative journalism and this has left whistle blowers exposed. The law further protects them from victimization and includes an establishment affected by disclosure.[40] The word establishment is very vague as the act does not define what establishments can amount to victimization of whistleblowers. Whistle blowers are not only discriminated or intimidated, some are tortured, killed, go missing among others especially for high profile cases. With this background there is need to protect whistle blowers which reduces corruption hence increasing investment.

IV. Strengthen the financial muscle of institutions.

Uganda's public servants face significant challenges, including meager salaries and inadequate resources, hindering effective investigations and law enforcement. This precarious situation fosters corruption, as civil servants seek illicit means to supplement their income. To combat corruption and attract investment, Uganda must bolster public institutions' financial capacity, ensure judicial independence, and allocate sufficient resources for investigations. By strengthening financial foundations, Uganda can reduce corruption incentives, foster transparency and accountability, enhance investor confidence, and drive economic growth. Fair compensation and adequate resources will empower public servants to uphold justice and enforce laws effectively, propelling Uganda's progress.

V. Instilling of moral values and rectifying the perception of corruption in society.

Corruption perpetuates in environments where it is socially accepted, and Uganda is no exception. The widespread normalization of corruption hinders efforts to combat it, necessitating a shift in societal attitudes. Empowering civil society and media, free from

38 *Stefan Ittner*., Fighting Corruption in Africa – A Comparative Study of Uganda and Botswana, PhD Thesis, Deutsche Hochschule für Verwaltungswissenschaften Speyer (German University of Administrative Sciences Speyer.), 2009, p.82.

39 Whistleblowers Protection Act Cap. 34, 2010, sec 2(d)(e).

40 Whistleblowers Protection Act Cap. 34, 2010, 9(2)(b).

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interference and censorship, is crucial in educating the public about corruption's devastating consequences. By fostering awareness and promoting transparency, Uganda can reduce corruption's social acceptance, encourage citizen engagement, and create a conducive environment for investment. Unfettered civil society and media will expose corruption, advocate policy reforms, mobilize public support, and hold leaders accountable, ultimately transforming Uganda's governance landscape and driving sustainable development.

VI. Creation of custom-made anti-corruption measures.

It's important to note that most of the anti-corruption measures are tailored from those that were already in exitance especially in the developed countries. Whereas that is good, it's important for stake holders to study our society, the causes and level of corruption, and come up with measures that can solve the current situation. This will reduce cases of corruption and promote investment in Uganda

VII. Improving accountability and transparency.

There is need to have strong accountability systems where the different stake holders are held accountable of their acts, this builds the confidence of investors hence promoting investment.

L. CONCLUSION

Corruption remains a significant obstacle to investment in Uganda, with far-reaching consequences for economic growth and development. However, the government of Uganda has taken various measures to combat corruption, including the establishment of a strong legal framework and an interlocking web of anti-corruption institutions. These efforts have contributed to a reduction in corruption and an increase in investor confidence. Nevertheless, more work needs to be done to address the root causes of corruption and ensure that anti-corruption measures are effective and sustainable. Therefore, this study recommends a multi-faceted approach to combating corruption, including strengthening institutions, improving transparency and accountability, and promoting citizen engagement. By fostering a conducive investment environment, Uganda can attract more investment, promote economic growth, and achieve sustainable development.

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III. The East African Community Protocol on Good Governance, November 20, 2009.

IV. The Treaty Establishing the East African Community.

V. *Dailly Monitor*, How Canadian Investors Were Conned by Ugandans at Parliament, The Citizen, June 30, 2024 available at https://www.thecitizen.co.tz/tanzania/news/east-africa-news/how-canadian-investors-were-conned-by-ugandans-at-parliament-4667118#story (accessed on 30th June 2024).

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