



DUE DILIGENCE • INVESTIGATIONS • ADVISORY

Regional Bribery and Corruption Trends Report:

PART 3 - AFRICA 2025



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About PSA

PSA is a global specialist risk consultancy, delivering critical information to our clients through our three core service lines: **Due Diligence, Investigations, and Advisory**. We operate where our clients do business, with regional offices staffed by investigators and responders who have extensive in-region experience gained from professional backgrounds in corporate investigations, government intelligence and law enforcement. PSA is committed to the idea that everything we do is driven by value-added human analysis. We put findings in context and deliver insight, not just information. With offices located throughout the globe, PSA's team is positioned to provide insight and analysis on subjects anywhere in the world.



In 2024, PSA has engaged in investigative and due diligence activities in more than 161 countries on six continents.

COUNTRIES PSA HAS OPERATED IN:

-  Projects completed in the last 5 years.
-  Projects completed in the last 2 years.



For research in comprehensively sanctioned countries, PSA's work is appropriately restricted to media and dataset reviews.



About This White Paper

This third installment in PSA's Regional Bribery and Corruption Trends series examines the evolving anti-bribery and anti-corruption (ABAC) landscape across key jurisdictions in Africa. Building on the foundations established in Part I (Asia Pacific) and Part II (Latin America), this section analyzes corruption patterns, enforcement dynamics, and the structural governance challenges shaping risk exposure for multinational corporations (MNCs) operating in the region. Drawing on PSA's due diligence work and in-region investigative experience, the paper highlights how formal legal frameworks in many African jurisdictions coexist with persistent enforcement gaps and entrenched informal practices. While several countries have strengthened statutory prohibitions against bribery and related offenses, the uneven application of these laws, coupled with socioeconomic and political

pressures, continues to complicate compliance outcomes for organizations engaging in local markets.

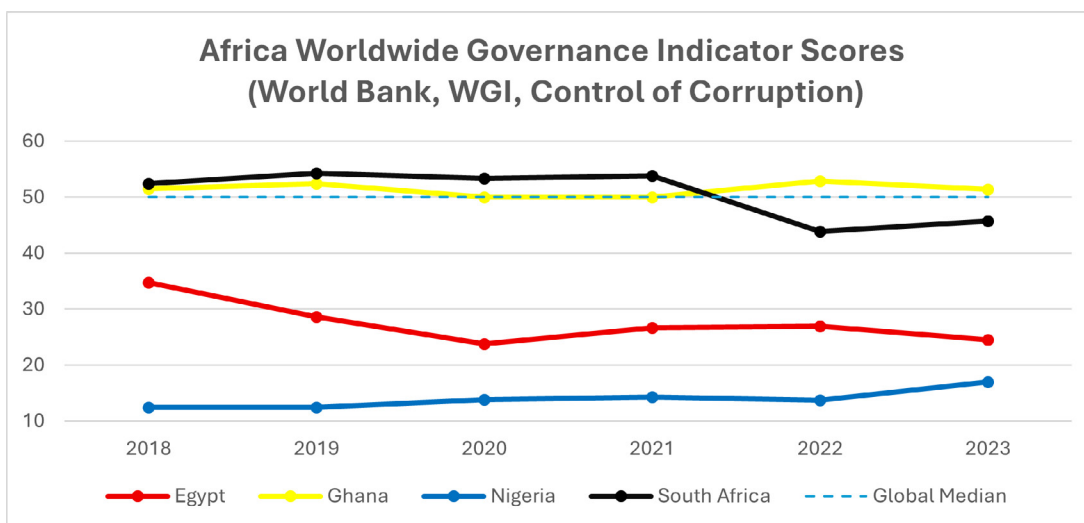
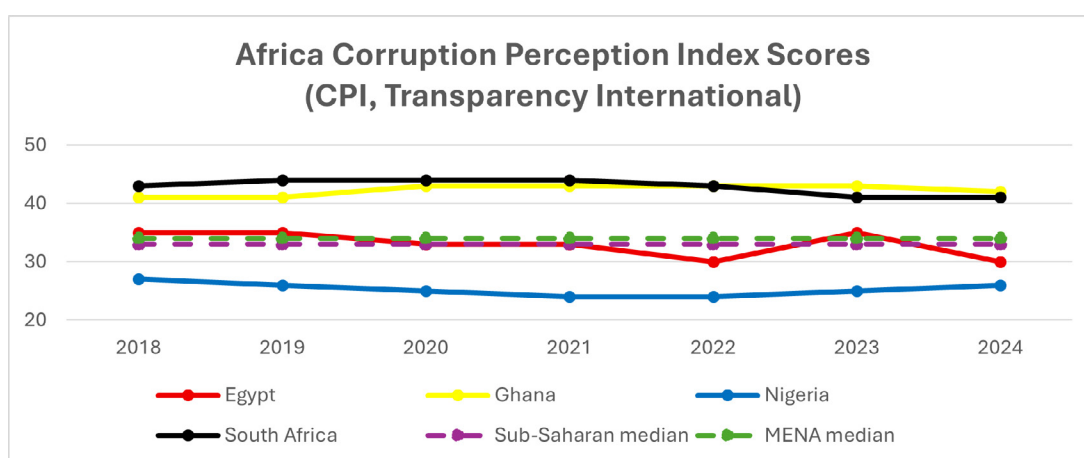
In line with prior installments, this white paper provides an overview of regional CPI and WGI trends, followed by jurisdiction-specific analyses spanning Egypt, Ghana, Nigeria, and South Africa. Each section outlines key ABAC legislation, examines recent corruption cases, and assesses practical compliance implications for businesses. The paper concludes with PSA case studies that illustrate how these risks manifest in real-world due diligence engagements across the African continent.

“the paper highlights how formal legal frameworks in many African jurisdictions coexist with persistent enforcement gaps and entrenched informal practices”

AFRICA REGIONAL OVERVIEW

Between 2018 and 2023, the Corruption Perceptions Index (CPI) scores in the Sub-Saharan Africa region remained stable. On the other hand, CPI scores in the Middle East and North Africa (MENA) region, particularly in Egypt, fluctuated within the same period. During this time, PSA has completed hundreds of due diligence projects in the region for our clients in key African jurisdictions including Egypt, Ghana, Nigeria, and South Africa.

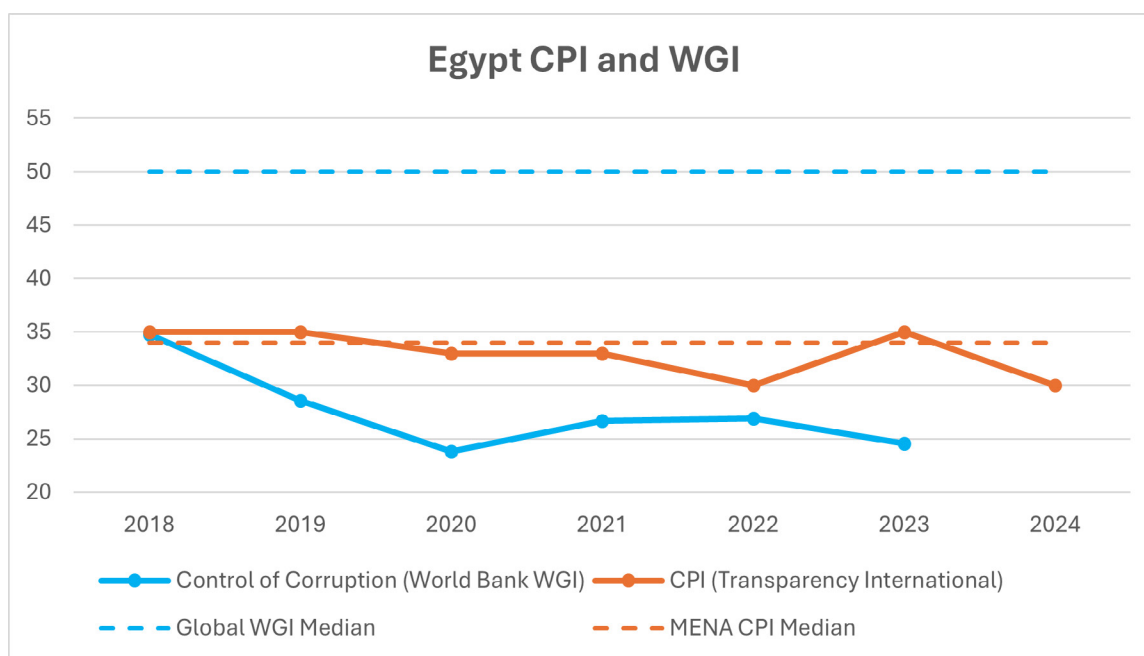
CPI scores in Ghana and South Africa have consistently exceeded the Sub-Saharan region's median score of 33; however, Nigeria has scored far below the Sub-Saharan Africa region median at 26. This indicates that Ghana and South Africa may experience relatively lower levels of corruption compared to other nations in Sub-Saharan Africa, such as Nigeria. Conversely, Egypt's CPI scores have shown more variability in recent



years, at times falling below the median for the MENA region, implying that Egypt experiences higher levels of corruption compared to neighboring countries. The World Bank's Control of Corruption scores for these jurisdictions indicate similar trends when compared to the global context, as Ghana and South Africa score close to the global median, whereas Egypt and Nigeria fall far below it. These countries' scores largely reflect recent corruption scandals and the persistence of corrupt practices within their societies. Although these Sub-Saharan and MENA countries possess robust legal frameworks designed to address and criminalize corruption and related offenses, the effectiveness, applicability, and enforcement of these laws are often compromised by insufficient implementation.

Consequently, inadequate enforcement perpetuates a culture of corruption throughout Africa. Corruption is a deterrent to both domestic and foreign direct investments, as it creates an inequitable business environment, elevating transaction costs and increasing the risk of exposure to bribery and other illegal practices. While it is essential for these jurisdictions to enhance and ensure the effective implementation of Anti-Bribery and Anti-Corruption (ABAC) laws, it is equally crucial for entities seeking to carry out business in these jurisdictions to bolster their compliance and due diligence practices to improve risk management.

COUNTRY SPECIFIC OVERVIEWS | EGYPT



Egypt's Transparency International Corruption Perception Index ("CPI") score has fluctuated around the low and mid-30s for over a decade, and it reached its lowest score of 30 in 2024. In parallel, Egypt's World Bank Control of Corruption score has been characterized by a steady downward trend since 2018, except in 2021, when it increased by 2.86 points but resumed its downward trend in 2022. Authoritarian governments like Egypt's exercise a high degree of control over the country's socioeconomic system and have limited transparency. This opens opportunities for corrupt practices and opaque procurement processes.

Egypt's key anti-bribery law, the Egyptian Penal Code ("EPC"), criminalizes active and passive bribery, attempted corruption, gift giving with the intention to influence, abuse of office, and the use of public resources for private gain. Both the recipient and the giver of the

bribe are held legally liable. However, the EPC only applies to natural persons, unless it explicitly states that juridical entities are also liable. This means that while bribery penalties can extend to employees at corporate entities, the entities themselves will not be held directly liable. Additionally, Egypt has the Public Procurement Law, which aims to rationalize public expenditure and combat corruption, though it has been criticized for its inadequate and uneven implementation and enforcement.

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Furthermore, there is a strong culture of corruption in Egypt, one in which businesses require connections (known as “wasta”) and the use of middlemen to operate, as well as baksheesh (which can be a colloquial term for bribery). These have become ingrained practices for “getting things done”. Egypt’s political system is also characterized by high levels of corruption. In December 2023, President Abdul Fattah al-Sisi secured his third six-year term after overthrowing the elected president Mohamed Morsi in 2013. Sisi’s terms have been marked by extensive infrastructure spending, and a lack of transparency.

Egypt has been experiencing economic crises since 2011, which have been characterized by increasing food prices, high unemployment rates, a decrease in foreign investment and tourism revenues, and the devaluation of local currency after the fall of former president Hosni Mubarak. This may be attributed to the Egyptian military’s significant influence over political decision-making. Military control over several economic sectors has generated an unbalanced competitive environment where military-affiliated entities enjoy exclusive privileges which include tax and customs exemptions and preferential treatment.

Notable Enforcement Cases

- SEC Charges Multinational Telecommunications Company with FCPA Violations:
On December 6, 2019, the US Securities and Exchange Commission (SEC) charged Swedish telecommunications company Telefonaktiebolaget LM Ericsson (“Ericsson”) due to its involvement in a large-scale bribery scheme in multiple countries, including in Egypt. The SEC alleged Ericsson had committed offenses from 2011 to 2017, including Ericsson subsidiaries obtaining business contracts valued at approximately USD 427 million by using third parties to bribe officials in other countries. Ericsson’s Egypt subsidiary pleaded guilty to violations of FCPA anti-bribery provisions. Ericsson agreed to pay more than USD 539 million in disgorgement and prejudgment interest to settle the SEC’s charges, and USD 520 million to resolve parallel criminal charges by the US Department of Justice. Ericsson was also ordered to retain an independent compliance monitor for at least three years.
- Egyptian Government Officials Bribe Former US Senator Menendez:
Egyptian government officials, Wael Hana and Major General Khaled Ahmed Shawky Osman, and their affiliates were involved in bribery and corruption between 2018 and 2019 with former US Senator and Senate Foreign Relations Committee chairman, Robert Menendez. Hana and Osman allegedly facilitated several payments in cash and other luxury items in exchange for political favors, such as the facilitation of arms sales to Cairo and ensuring the approval of US military assistance to Egypt. In 2025, a federal jury in the US found Menendez guilty on 16 criminal counts of bribery, illegal action as a foreign agent, extortion, and obstruction of justice. Meanwhile, Wael Hana was sentenced to eight years in prison and fined USD 1.25 million.
- Corruption in the Ministry of Water Resources and Irrigation:
In January 2024, Egyptian authorities exposed the largest corruption network of officials in

the Ministry of Water Resources and Irrigation, who were found to have allegedly received millions of Egyptian pounds and a villa as bribes. The bribes were paid in exchange for facilitating business deals and financial dues to the owners of companies working in the rehabilitation of canals and water drains. As of January 2024, Egyptian corruption oversight bodies discovered several other instances of bribery and corruption in the country. Egyptian courts are exploring the possibility of filing cases against those involved.

PSA CASE STUDIES:

- **Investigation of Corruption Allegations**

PSA was engaged to investigate a board member of an Egyptian fund after it emerged that the individual had been briefly detained during the 2017 anti-corruption crackdown in Saudi Arabia under circumstances that had never been publicly clarified. Beginning with a comprehensive review of Arabic social media coverage, the inquiry was extended into a series of discreet inquiries with Egyptian and Saudi associates familiar with the subject and their businesses at the time. The results of these discreet inquiries effectively put to bed any concerns related to these events.

- **Agricultural Bribery Investigation**

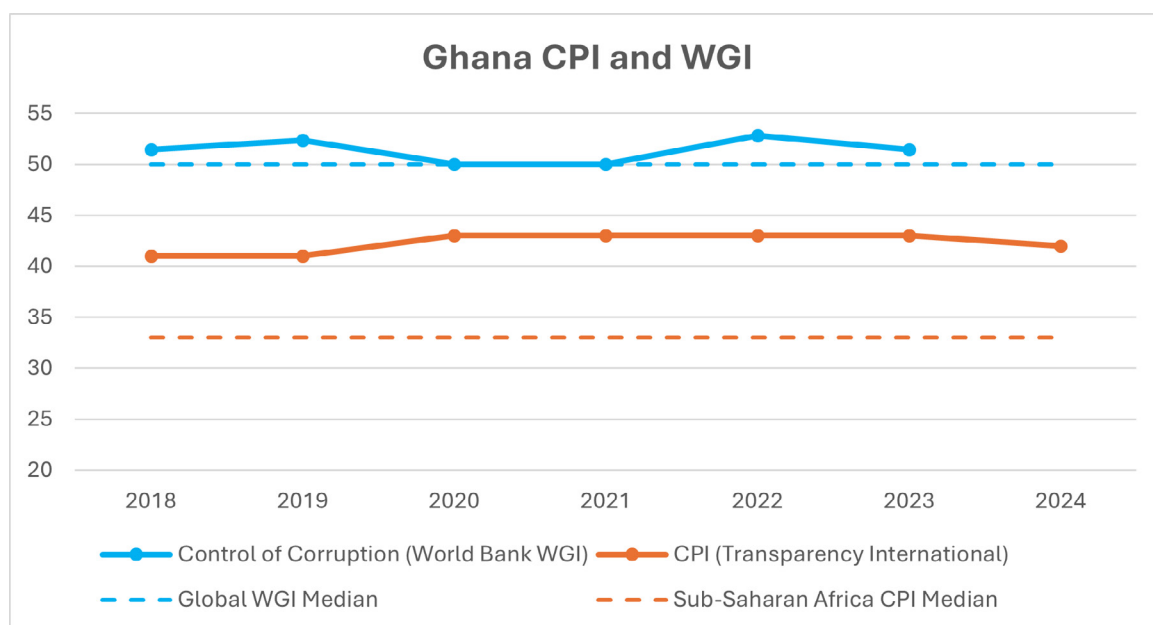
PSA was tasked to look into a bribery allegation tied to an individual possibly related as a board member of an Egyptian joint stock company engaged in the production of poultry products. PSA's research in the public domain found that the individual had allegedly bribed the Egyptian minister of agriculture in exchange for land in Natryn Valley, Egypt. The individual was detained by the Supreme State Security Prosecution while regulatory investigations on the issue were conducted. While public domain searches were unable to confirm whether the identified individual was affiliated with the Egyptian joint stock company, PSA presented our findings to the client for their further internal action.



CONCLUSION

Despite the establishment and existence of several oversight and anti-ABAC regulatory bodies in Egypt, corruption remains a risk for businesses that aim to operate and invest in the country. Corrupt practices such as facilitation payments, gift giving, and the use of “wasta” are deeply ingrained in Egyptian society and are often required to move transactions and business along. The country’s consistently low CPI and WGI scores capture its political landscape – a society where corrupt and illegal practices prosper because they are entrenched by authoritarian governments. Taking this into consideration, MNCs in Egypt must employ robust anti-bribery programs focused on risk assessment and employee training, specifically in sectors involved in public procurement and in industries that are heavily exposed to government entities, to ensure compliance and mitigate risks.

COUNTRY SPECIFIC OVERVIEWS | GHANA



Ghana has lower corruption levels compared to neighboring countries in Sub-Saharan Africa, as indicated by its CPI scores which plateaued at 43 between 2020 and 2023, before a slight decrease in 2024. While it is notable that Ghana has consistently scored above the Sub-Saharan African region's median score, it is among 90% of the countries in the region to score below 50. Similarly, Ghana's WGI score, though within the global median, has fluctuated around the 50-point mark since 2018. These scores may be tied to the extent to which public power is exercised for private gain.

Ghana's main ABAC legislation is the Criminal Code, which criminalizes both active and passive bribery, extortion, willful exploitation of public office, use of public office for private gain, and bribery of foreign public officials. Ghana has multiple laws covering specific aspects of bribery and corruption, such as the

Public Procurement Act, the Financial Administration Act, and the Internal Audit Agency Act, which were introduced to promote public sector accountability and combat corruption. Ghanaian legislation also criminalizes bribery and corruption in corporate entities. The Companies Act of 2019 indicates corporate entities are subject to corporate liability for the actions of their board members or managing directors.

Although Ghana has an extensive legal framework against corruption, the efficacy of these measures is undermined by inadequate enforcement. It is common practice for local government employees to request a tip to facilitate license and permit applications. According to a 2022 UN

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study which surveyed 15,000 Ghanaian residents, 26.7% of the surveyed adult population admitted to paying bribes to a public official in 2021, with the paid bribes estimated to amount to more than GHS 17.4 million (USD 1.13 million). This indicates that corrupt interactions between the public and those employed in the country's government institutions are common and established.



Notable Enforcement Cases

- SEC Charges Former Financial Services Executive with FCPA Violations:

On April 13, 2020, the SEC charged a former executive of a foreign-based subsidiary of a US bank holding company with orchestrating a bribery scheme to win a government contract for its client, a Turkish energy company, to build and operate an electrical power plant in Ghana. The former executive arranged to funnel USD 2.5 million to a Ghana-based intermediary to pay bribes to Ghanaian government officials. Further, the former executive took steps such that his employers were unaware of this bribe. The SEC is seeking monetary penalties against the former executive, and if found guilty, they may face a maximum penalty of 20 years in prison for conspiring to commit money laundering and five years in prison for each count of violating the FCPA and conspiring to violate the FCPA.

- SEC Charges Global Software Company SAP for FCPA Violations:

On January 10, 2024, the SEC announced charges against global software company SAP SE for violating FCPA regulations related to bribery schemes paid in Ghana and other countries. The company employed third-party intermediaries and consultants from December 2014 to January 2022 to pay bribes to government officials to obtain business with public sector customers. Additionally, these bribes were recorded as legitimate business expenses in the company's books and records. The company agreed to pay disgorgement of USD 85 million and prejudgment interest of USD 13.4 million.

- Former Banker Charged with Bribing Ghanaian Official Extradited to the United States from the United Kingdom:

On July 16, 2024, a US-Ghanaian citizen was charged with FCPA violations and money laundering related to the development of a power plant in Ghana. The individual allegedly bribed Ghanaian government officials to secure a lucrative development contract relying on the US banking system to execute his scheme.

- Alleged Money Laundering Case Involving a Ministry Official:

In July 2023, Cecilia Dapaah, the former Minister of Sanitation and Water Resources of Ghana, was found to be involved in a corruption case. The controversy started when two of Dapaah's domestic workers were arrested and found with GHS 1 million, EUR 300,000 (USD 348,000), held in Dapaah's private residence in Accra City. Authorities questioned the existence of substantial sums of cash in a private home, which launched further investigations conducted by the Office of the Special Prosecutor (OSP). The OSP's investigations revealed suspicious financial activity which included USD 5 million and GHS 48 million (USD 3.12 million) across Dapaah's bank accounts. In February 2024, the OSP's investigation, along with the US Federal Bureau of Investigation (FBI)'s parallel probe, cleared Dapaah of her corruption allegations. However, the OSP transferred the case to Ghana's Economic and Organised Crime Office (EOCO) for further investigation, as they found that there were strong indications of suspected money laundering and structuring, which falls outside of OSP's jurisdiction.

PSA CASE STUDY:

- **Mining Sector Procurement & Licensing Irregularities**

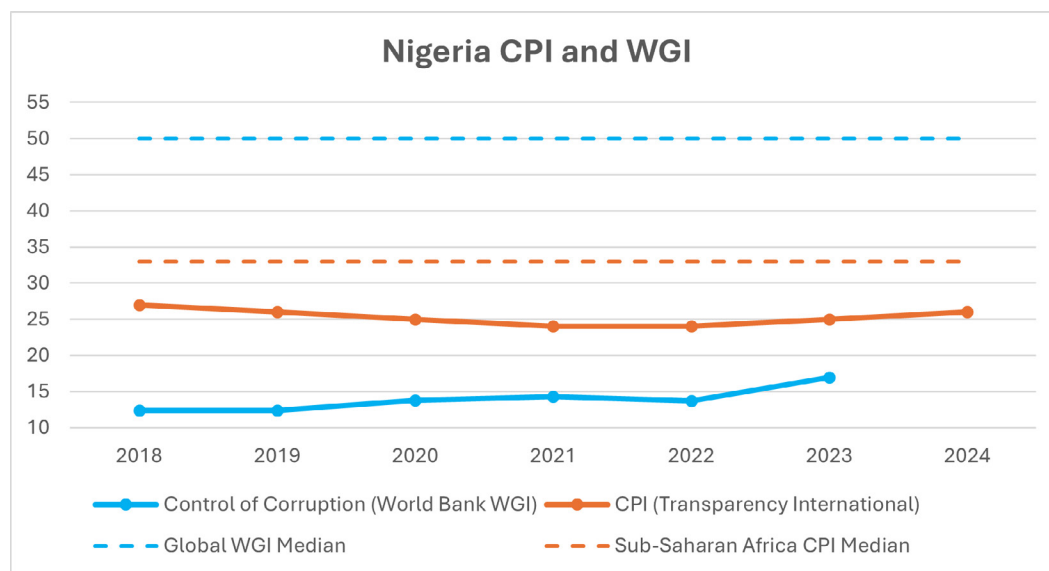
PSA was engaged to conduct due diligence on a Ghanaian mining services company following allegations that a senior executive had facilitated irregular licensing approvals in coordination with regional mining officials. The individual, reportedly connected to a former government minister, appeared in media reports for suspected kickbacks tied to small-scale mining permits and land allocations. PSA's investigation identified corroborating evidence, including documented payments to an intermediary previously cited in illicit mining ("galamsey") probes and procurement records showing inflated invoices benefiting politically exposed sub-contractors. While the executive is not currently the subject of any formal government investigation, PSA assessed the evidence as indicative of material integrity risks, with a clear pattern of conduct consistent with corruption in Ghana's mining sector.



CONCLUSION

While Ghana may have lower corruption levels compared to neighboring countries as implied by its CPI and WGI scores, MNCs may still face bribery and corruption-related problems when operating in Ghana. Ghanaian legislation appears to have a strong legal framework against bribery and corruption; however, the issue remains in the enforcement of these laws. In line with this, MNCs looking to carry out business transactions in Ghana must adopt stringent risk assessment processes to address bribery and corruption-related risks. This includes employee awareness and training, particularly focusing on risks associated with government interactions.

COUNTRY SPECIFIC OVERVIEWS | NIGERIA



Nigeria's CPI scores steadily declined from 2018 to 2022, before increasing in the past two years. Meanwhile, Nigeria's WGI scores witnessed a steady increase from 2018 to 2023. It is notable that while the country's corruption controls have seemingly improved, as indicated by the increase in WGI scores, these improvements are not reflected in the CPI scores which continuously trended downwards prior to 2023. MNC's are likely to encounter corruption when conducting business in Nigeria which manifests in patronage networks that play a dominant role in the country's public administration. Corruption risks are pervasive throughout different industries; however, the oil sector in Nigeria is most widely known for its corrupt practices.

Nigeria's primary ABAC legislations are the Corrupt Practices and Other Related Offences Act of 2000 ("ICPC Act") and the Economic Financial Crimes Commission Act 2004 ("EFCC Act") which established the Economic Finan-

cial Crimes Commission ("EFCC"). The ICPC Act criminalizes the giving and receiving of bribes intended to influence officials in the public sector, while bribery in the private sector is criminalized by the EFCC Act. Notably, Nigerian ABAC regulatory bodies have shifted their focus from pursuing criminal charges, which tended to be resource and time consuming, to embracing the use of non-conviction-based forfeiture and plea bargains, thus increasing the recovery of the proceeds from corruption and other financial crimes.

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Notable Enforcement Cases

- Hundreds of Nigerian Homes Seized in Anti-graft Case:
In December 2024, the EFCC announced its largest seizure of assets as it took control of a housing estate in Abuja which consisted of over 750 properties which were allegedly purchased with the proceeds of corruption. The EFCC did not disclose the owner's identity; however, it indicated that the estate belonged to a former high-ranking government official. The property was seized in line with the EFCC's mandate and policy directive of preventing individuals from benefiting from illegal activities.
- Nigeria's Longest Running Corruption Case:
In 2009, Erastus Akingbola, the former chief executive of Nigeria's Intercontinental Bank, was charged with fraud for misappropriating NGN 179 billion (USD 118.14 million). Akingbola denied all allegations levied against him, stating that these allegations were politically motivated. He claimed that he was being targeted because he refused to merge Intercontinental Bank with the now-defunct Nigerian bank Societe Generale, a bank owned by the Saraki family. Following these events, Akingbola's assets and shares were frozen. The case is still ongoing.
- Nigerian President Suspends Humanitarian Minister in Corruption Scandal:
In January 2024, Nigerian President Bola Ahmed Tinubu suspended the country's Minister of Humanitarian Affairs and Poverty Alleviation over the use of a private bank account for transactions in the ministry concerning the government's social welfare program. It was alleged that USD 640,000 in public funds, meant for the government's social welfare program, were diverted into a personal bank account. The investigation puts into question the framework and mechanisms of Nigeria's social investment programs, as it looks into how and why the former minister was able to divert public funds into a private bank account. In April 2024, the EFCC recovered NGN 30 billion (USD 20.7 million) which were traced back to more than 50 bank accounts. The minister was relieved of ministerial duty in October 2024.

PSA CASE STUDIES:

- **IT Fraud Investigation**

PSA was engaged to carry out due diligence research into fraud and corruption allegations concerning an information technology (IT) consulting company. A former governor of Nigeria's Central Bank allegedly received USD 600,000 from the IT consulting company, and the amount was said to have come from kickbacks in contracts that the Nigerian government had awarded to the IT company between 2014 and 2019. Separately, PSA also found that in November 2025, the former governor and the Nigerian Central Bank were accused of recirculating dirty and unfit bank notes amounting to NGN 29.77 billion (USD 20.5 million) which was in violation of the bank's own Clean Note Policy.

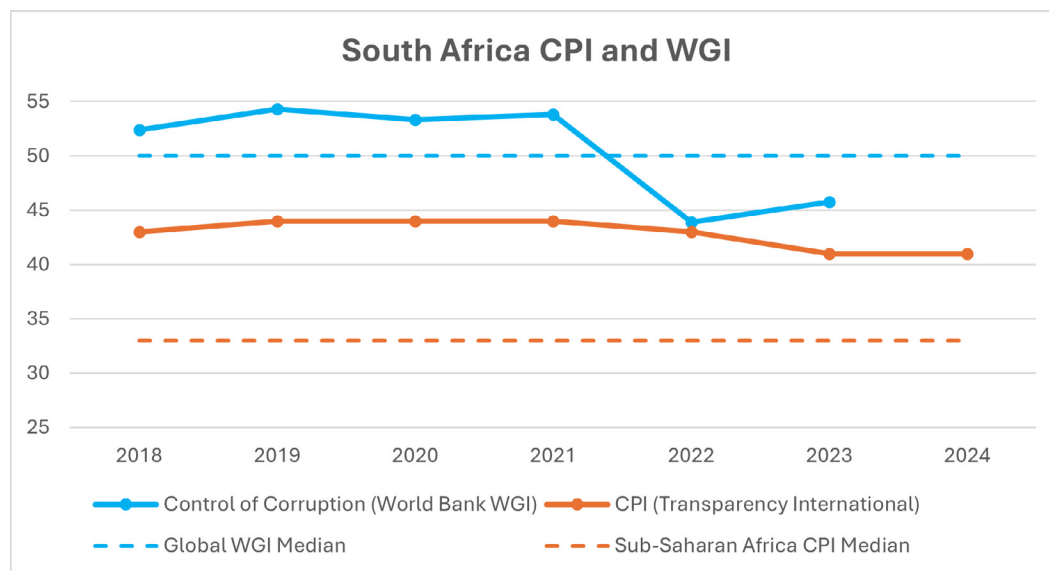
- **Oil and Gas Bribery Allegations**

PSA was tasked to investigate an oil and gas services company and its alleged involvement in fraud and bribery. PSA found that the company, along with the director general, who was also the deputy director of the Damage Assessment of the National Oil Spill Detection and Response Agency (NOSDRA) of Nigeria, defrauded the Nigerian government of NGN 3 billion (USD 1.98 million). Further searches discovered that the company allegedly attempted to bribe police officers to ensure that the report prepared by the lead investigator was altered or destroyed. The bribes allegedly amounted to NGN 20 million (USD 13,200).

CONCLUSION

Nigeria's consistently poor CPI and WGI scores reflect the state of corruption in the country – a pervasive risk that MCNs will have to deal with when engaging in business in the country. Despite having a legal framework that criminalizes numerous acts of bribery and corruption-related financial violations, these have limited impact in deterring the prevalence of corrupt and illegal activities in Nigeria, especially in higher-level politics and in state-controlled industries. As such, MCNs must take extra steps to avoid involvement in such risks. MCNs must apply strengthened compliance and due diligence checks towards its counterparties, while increasing awareness through zero-tolerance policies in their internal activities.

COUNTRY SPECIFIC OVERVIEWS | SOUTH AFRICA



South Africa's Corruption Perception Index (CPI) has remained consistent around the score of 44 between 2018 and 2021, but it began to decline in 2022 and was around the 40-point mark in 2024. In parallel, South Africa's World Bank Control of Corruption (WGI) score was consistent from 2018 to 2021 until it suffered a sharp decrease in 2022. It is worth noting that South Africa's CPI scores are consistently above the regional median, and both the CPI and WGI scores reflected similar trends. These scores may be attributed to increased corruption and fraud involving COVID-19 procurement, as well as corruption scandals involving current and former presidents Cyril Ramaphosa and Jacob Zuma.

South Africa's primary ABAC legislation relies on the Prevention and Combating of Corrupt Activities Act, 2004 ("PCCAA"), which is modeled after the UK's Bribery Act. This legislation, which covers both individuals and enti-

ties in the public and private sectors, criminalizes a wide range of activities including bribery under the general offense of "corruption". The PCCAA has extraterritorial jurisdiction in some circumstances – such as on citizens or residents of South Africa and incorporated entities or charities in South Africa. The country also has laws targeting specific financial crimes, such as the Protected Disclosures Act of 2000 and the Competition Act of 1998.

Despite South Africa's existing anti-corruption legal framework, these laws are inadequately enforced. Regulatory bodies in South Africa are

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under-resourced, both from a financial and skills perspective. In practice, the country experiences widespread corruption, particularly in public procurement. South Africa's Electricity Supply Commission ("Eskom") supplies more than 80% of the country's electricity, and is supported by public funds. However, deviations in procurement, which have led to the loss of public funds, have caused the return of rolling blackouts. Furthermore, bribery thrives at the central government level, which is evident in the series of recent corruption scandals involving former and incumbent presidents, such as when incumbent president Cyril Ramaphosa was accused of theft and corruption in 2020 amounting to more than USD 500,000. After a stringent investigation, South African prosecutors decided not to pursue charges against Ramaphosa, stating that the available evidence could not sustain charges.

Notable Enforcement Cases

- ABB Ltd. Settle SEC Charges Over Bribery Issue in South Africa:
On December 3, 2022, the SEC announced that it filed charges against global electrification and automation technology company ABB Ltd. for violating FCPA regulations after being involved in a bribery scheme in South Africa. ABB Ltd. agreed to pay USD 75 million in a civil penalty to settle the SEC's charges. It was found that from 2015 to 2017, ABB Ltd. executives in Switzerland and South Africa paid more than USD 37 million to bribe a South African government official and Eskom executive in exchange for a USD 160 million contract to provide cabling and installation work at Eskom's Kusile Power Station.
- SEC Charges Gartner, Inc. with FCPA Violations in South Africa:
On May 6, 2023, the SEC announced that it settled charges against Gartner, Inc. – a US-based technological research and consulting company, for violating the anti-bribery, books and records, and internal controls provisions of the FCPA. It was discovered that from December 2014 to August 2015, Gartner Inc. engaged in a corrupt arrangement with a private South African company with close ties to South African government officials. Gartner Inc. agreed to a cease-and-desist order and to pay disgorgement and prejudgment interest totaling USD 856,764 and a USD 1.6 million civil penalty.

- McKinsey & Company Africa Paid Over USD 122M in Connection with Bribery of South African Government Officials:

In December 2024, McKinsey and Company Africa (Pty) Ltd (“McKinsey Africa”), a subsidiary of international consulting firm McKinsey & Company Inc. paid over USD 122 million to resolve an investigation by the US Justice Department into a bribery scheme concerning government officials in South Africa between 2012 and 2016. McKinsey Africa was charged for allegedly violating the anti-bribery provisions of the FCPA. Court documents and admissions found that McKinsey Africa paid bribes to former officials at Transnet SOC Ltd. – South Africa’s state-owned and controlled custodian of ports, rails, and pipelines– and officials of Eskom. 50% of the fine was credited to South Africa’s criminal asset recovery account. McKinsey Africa was able to trace the employee responsible for the conduct of bribery and has terminated the individual’s employment.

PSA CASE STUDY:

- **Public Utilities Corruption**

PSA was engaged to investigate bribery and corruption allegations against a former director of a state-owned public utilities entity in South Africa. The individual, affiliated with a former minister, was mentioned in reports of bribery and corruption linked to contracts awarded by the public utilities entity to a foreign company. The individual was also part of the public utilities entity’s tender committee overseeing separate contracts that allegedly included irregular advance payments to the foreign company. PSA found that the individual is not considered as a central target of South Africa’s corruption investigative body, State Capture Commission, but is among those recommended for criminal prosecution by the commission.

CONCLUSION

On paper, South Africa has a strong legal framework that mainly addresses bribery and corruption. Despite this, corruption in public procurement and bribery at the central government level remains prevalent. This may be attributed to the lack of resources, both in terms of skills and finance, of regulatory bodies in South Africa. Given these circumstances, the implementation of ABAC legislation in South Africa may prove to be difficult. As such, MCNs will continue to face bribery and corruption risks when engaging in business activities in South Africa, so it is necessary for MCNs to implement employee training and risk assessment programs that ensure compliance and reduce risks that they may potentially encounter when conducting business in the country.





PSA's Commitment to Compliance

Across Africa, corruption risks remain closely tied to institutional fragility, uneven enforcement, and the persistence of informal networks that influence business and government interactions. While many jurisdictions have strengthened anti-bribery and corruption legislation—including modernized criminal codes, procurement reforms, and financial transparency measures—gaps in implementation continue to challenge multinational companies operating in the region. Complex political dynamics, capacity constraints within regulatory bodies, and the normalization of practices such as *wasta* or facilitation payments underscore the need for heightened vigilance. For organizations engaging in African markets, understanding jurisdiction-specific vulnerabilities and anticipating how they intersect with global compliance obligations is essential. At PSA, we recognize that effective compliance in Africa requires a nuanced approach that goes beyond statutory analysis. Our teams leverage deep regional expertise, multilingual research capabilities, and on-the-ground intelligence to identify material integrity risks early—whether in public procurement, politically exposed person

(PEP) networks, or sector-specific corruption patterns across energy, infrastructure, and state-linked industries. By combining rigorous open-source verification with confidential human intelligence, PSA equips clients with the clarity needed to navigate fast-evolving regulatory landscapes and to assess counterparties in environments where enforcement outcomes may be unpredictable.

As African jurisdictions continue to refine their ABAC frameworks—often at different speeds and with varying degrees of institutional support—PSA remains committed to helping organizations uphold the highest standards of ethical conduct. Our work across Africa reflects the same global mission embodied in Parts I and II: delivering due diligence and investigative insights that are accurate, actionable, and rooted in regional realities. Through a proactive, informed compliance posture, companies can not only reduce legal and reputational exposure but also contribute to strengthening transparency and accountability in one of the world's most dynamic and complex operating environments.