

Overview of Data

Ghana outperforms its neighbors and most African countries in terms of political stability and political and civil liberties. However, it still scores below global averages on corruption and transparency indicators, suggesting moderate to high corruption risks. Four FCPA cases connected to alleged corruption in Ghana reflects an elevated degree of enforcement in relation to the size of Ghana's economy.

Corruption and Governance Indicators	Ghana	G7 Average
Transparency International Corruption Perceptions Index	41	73
World Bank Control of Corruption Score	53	88
World Justice Project Rule of Law Score	58	76
Major Correlates of Corruption		
Nominal GDP Per Capita Percentile Rank	21	89
World Bank Government Effectiveness Score	46	90

**All indicators are scores/100 or are percentile ranks, 100=best. Some scores have been adjusted accordingly. 1-33 34-66 67-100*

World Bank Enterprise Survey Responses (2013)	Ghana	Top 10 Countries
Share of firms reporting at least one bribe request	19%	1.4%
Share of firms expected to give gifts to secure government contract	35%	1.9%
Share of firms expected to give gifts to officials to "get things done"	24%	1.5%
Share of businesses reporting corruption is a major constraint	44%	7.5%

Illustrative FCPA Cases (as reported)

Total FCPA Enforcement: 4 Cases

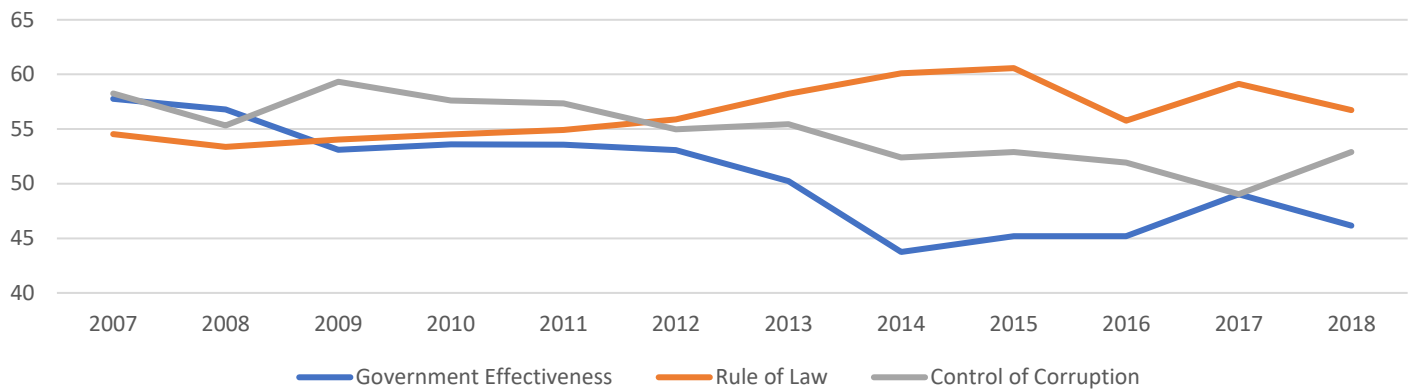
- **Analogic**—In 2016 the medical device producer agreed to pay more than USD 11 million to settle charges that its subsidiary BK medical had engaged in a pattern of suspicious payments in several countries, including Ghana. BK medical allegedly allowed itself to be used as a slush fund for its distributors, permitting the redistribution of money without proper accounting and controls.
- **Kinross Gold**—In 2018 the Canadian gold mining company paid nearly USD 1 million to settle an SEC complaint that it had insufficient due diligence procedures and controls in place to prevent the payment of bribes to government officials. The company reportedly assessed that its acquisitions in Ghana and Mauritania—mining companies Tasiast and Chirano—had insufficient ABC controls. It was cited for allegedly failing to adequately remedy this despite continuing to engage in high-risk transactions.

Information Accessibility and Transparency

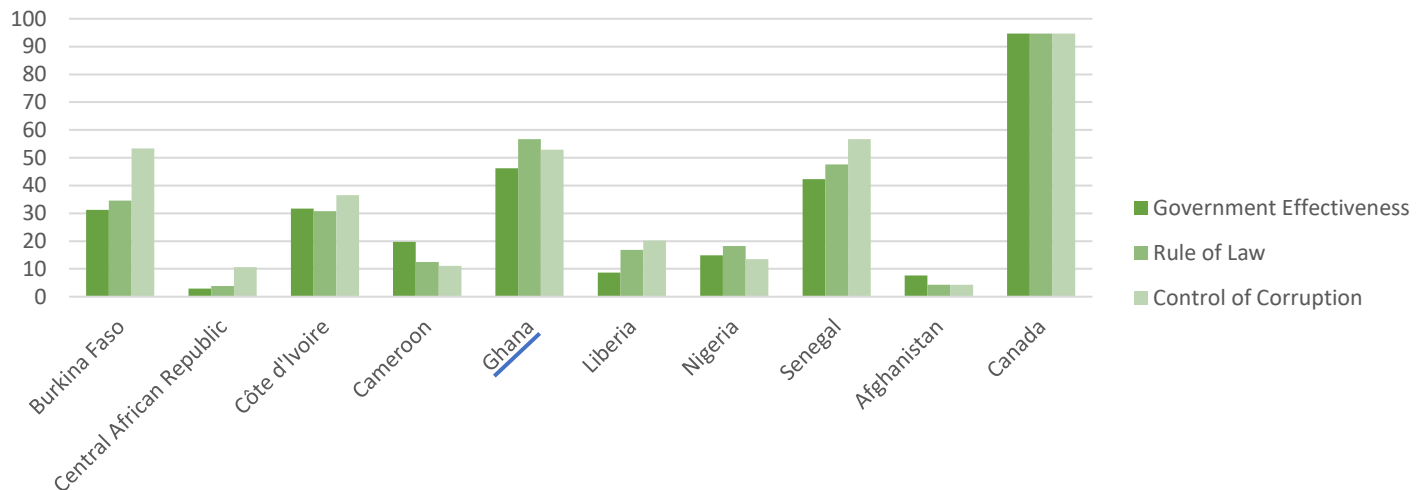
Availability of Records	●	Most litigation and corporate registration records are available online for a nominal fee. Shareholding information is not available.
Freedom of Press	●	Reporters without Borders rank 27/180 (180=worst) Freedom House score 33/100, “partly free” (100=least free)
Language Accessibility	●	Ghana’s official language is English. Other local languages do not affect research in media and records.
Financial Disclosure	●	Tax Justice Network Financial Secrecy Score—62 (100=worst)

● Poor ● Moderate ● Accessible

Trendlines—World Bank Worldwide Governance Indicators (100=best)



Country Comparison—World Bank Worldwide Governance Indicators (100=best)



Context: Corruption in Ghana

While legislation is on the books in Ghana criminalizing both active and passive bribery, numerous opportunities for corruption persist due to poor transparency rules for public officials coupled with economic and political incentives for rent seeking. Engagements involving public officials in Ghana should be approached with elevated caution. As with many resource exporting countries, corruption is a risk within extractive industries in Ghana, although there has only been one FCPA case related to mining and no oil & gas industry cases. Ghana also scores well on NRGi’s Resource Governance Index and is rated the best in Africa for governance of its oil & gas industry.

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