

## Governance Commitments in Letters of Intent for COVID19-Related Rapid Instruments<sup>1</sup>

Country	Type of Instrument	Commitment	Source
<b>Afghanistan</b>	<b>RCF</b>	<p>"We will do our utmost to ensure effectiveness and strong governance in implementing crisis-mitigation measures. To ensure full transparency, we commit to publishing quarterly reports on pandemic-related spending, including procurement contracts and the beneficial ownership of companies awarded those contracts. We will undertake audits of selected spending, to be performed by the Supreme Audit Office in line with our legislative framework and publish the audit reports by end-December. In addition, as per standard practice, select donor-financed programs and projects will be audited by external auditors approved by donors."</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 27</p>
<b>Bahamas</b>	<b>RFI</b>	<p>"We will adhere to best practices in procurement and contract awards related to the pandemic, ensuring transparency and ease of tracking of COVID-19 expenditures in the budget. We have recently re-</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 29-30</p>

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<sup>1</sup> This list includes governance safeguards in Letters of Intent (LOIs) for COVID-19-related rapid instruments (RCFs and RFIs) approved by the IMF's Executive Board as of October 2, 2020, excluding (i) the commitment to undertake a central bank safeguards assessment, which is required in all cases, and (ii) governance-related prior actions, which were included in several cases. The full list of approved rapid instruments can be found [here](#). For the reasons outlined in paragraph 19 of the [background paper](#) (e.g., early cases and/or cases with somewhat lower corruption risks), governance-related commitments have been added in all of these RFI/RCFs except in the following: Albania, Bosnia and Herzegovina, Cabo Verde, Cote D'Ivoire, Dominica, Ghana, Kosovo, North Macedonia, Panama, and St. Lucia.

		<p>established the Audit Committee to strengthen implementation of recommendations by internal and external audits. The Auditor General is empowered to undertake regular audits of public procurement. We will publish procurement contracts of crisis mitigation spending, including beneficial ownership information of companies awarded procurement contracts, report quarterly on COVID-19 mitigation spending, and such spending will be audited by the Auditor General in accordance with international best practice within 9 months of the end of the fiscal year, and auditing results will be published on the government’s website. We will also ask the Auditor General to quantify the revenue losses that are directly associated with the COVID-19 pandemic. [...] We intend to finalize the Public Procurement Law—which will modernize our procurement system and bring it in line with international best practice—by end-June this year. We also plan to submit the Public Financial Management Bill and the Public Debt Management Bill to Parliament by end-2020.”</p>	
<b>Bangladesh</b>	<b>RFI</b>	<p>“We are committed to ensuring that crisis resources are used transparently and effectively. Toward that end, we will ensure that applicants for COVID-19 related contracts provide their beneficial ownership information to the government and that this</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 32-33</p>

		<p>information is appropriately recorded and made available to audit authorities and will publish online (i) an audit of COVID-19 related expenditures and other government subsidized programs by the Office of the Comptroller and Auditor General within 12 months and (ii) crisis-related public procurement contracts and related documents, including the names of the companies awarded the contract and ex-post validation of delivery. We will seek to adopt reforms to allow publication of beneficial ownership information of companies awarded public procurement contracts as soon as feasible.”</p>	
<b>Bolivia</b>	<b>RFI</b>	<p>“...we commit to adhere to best practices in procuring and awarding contracts related to the pandemic (including by publishing regularly documentation on procurement contracts on the government’s website, together with ex-post validation of delivery along with the name of awarded companies and the name of their beneficial owners) as well as publishing an external independent audit report on virus-related expenditures once the crisis is over.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 23</p>
<b>Burkina Faso</b>	<b>RCF</b>	<p>“The government also commits to a transparent and accountable use of the funds disbursed under the RCF, including by enhancing transparency of health-related expenditures.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 35</p>

<p><b>Cameroon</b></p>	<p><b>RCF</b></p>	<p><i>First request</i> "We will ensure that the financial assistance received is used for the intended purposes, in strict compliance with the provisions of the Law on the Code for Transparency and Good Governance in Public Finance Management in Cameroon and the Law on the Financial Regime for the Government and Other Public Entities, all adopted in July 2018. For this purpose, the funds linked to COVID-19 will be subject to the strict application of the budgetary procedures and controls provided for by the above Laws. In addition, we commit to issue a semi-annual report on COVID-19 related spending and to commission an independent audit of this spending at the end of the 2020 fiscal year and publish the results.</p> <p>We also commit to publishing documents relating to the results of public procurement awarded by the government and the beneficial ownership of companies receiving procurement contracts on COVID-19 related expenditures. In the meantime, such COVID-19 related expenditures are being incorporated in a supplementary budget in preparation and expected to be presented to the Parliament in June 2020."</p> <p><i>Additional commitments in the second request, which apply also to spending financed by the first request:</i> "We reiterate our firm</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 21</p>
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		<p>commitment to an effective and transparent use of public funds, and to ensuring that funds received, including from the RCF disbursement and the resources freed up by the DSSI, are efficiently spent on addressing the pandemic crisis. To this end, we are committed in the context of contracts related to COVID-19 to (i) issuing before the RCF-2 Board date a circular implementing Article 90 of the Public Procurement Code to modify the standard procurement forms, in particular with regard to documents providing information on the identification of the beneficial ownership of companies receiving procurement contracts; (ii) publishing after the RCF-2 Board date on the website of the Public Procurement Regulatory Agency and within 30 days of the award on any contract, the results of public procurement awarded by the government and the beneficial ownership of companies receiving procurement contracts; (iii) publishing before the RCF-2 Board date, the backlog of all COVID-19 related contracts awarded since May 4, 2020, including the beneficial ownership; (iv) issuing a semi-annual report on COVID-19 related spending; and (v) commissioning an independent audit of this spending at the end of the 2020 fiscal year and publishing the results."</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 36</p>
<b>Central</b>	<b>RCF</b>	"...we will ensure that the additional	



		<p>the support of the Inspectorate of Public Finances within six months of the end of the fiscal year. The audit will also cover all COVID-related expenditures. Auditing reports, also including analysis of compliance with procedures, in particular with regards to regulated agreements, will be published within a month upon completion on the website of the Ministry of Finance and Budget. The full text of procurement contracts, along with the names of the beneficial owners of awarded legal persons, will be published on the website of the Ministry of Finance and Budget within 30 days of the award of any contract concluded under the fight against the coronavirus. Delivery reports for goods and services, including the list of suppliers and contractors, will be published on the website of the Ministry of Finance and Budget within three months of the end of the execution period for each contract.”</p>	
<b>Comoros</b>	<b>RCF/RFI</b>	<p>“We concur with Fund staff that strengthening institutions and promoting good governance, transparency and accountability, and tackling corruption are crucial for inclusive and sustainable growth. We are keen to ensure that the best possible use will be made of the funds provided by the IMF and to that effect, we will enhance mechanisms of reporting and controls for the disbursement of funds, building on</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 34</p>

		<p>recommendations of IMF-provided capacity building on government accounting of recent years. We commit to report quarterly on the spending of these funds and to commission an independent and robust third-party audit of this spending in about a year's time and publish its results. The Government will also publish regularly on its website dedicated to public procurement documentation on large public procurement projects, together with ex-post validation of delivery along with the name of awarded companies and the name of their beneficial owner(s). The Government expects that this website will be operational within six months. The Government will start publishing the information on its general website in case the website dedicated to procurement should become operational only with a delay."</p>	
<b>Costa Rica</b>	<b>RFI</b>	<p>"We are also committed to using the RFI resources transparently and through established governance mechanisms, including ex-post accountability and controls, to ensure the funds are used to address the Covid-19 related shocks."</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 29</p>
<b>Democratic Republic of Congo</b>	<b>RCF</b>	<p>"The proper use of those resources will be guaranteed through the implementation of our public financial management legislation, but also through the publication of budget execution figures contained</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 21</p>

		<p>in the treasury plan on a monthly basis to enhance financial transparency. Moreover, we commit to publish online all COVID-19 related procurement contracts that exceed US\$12,000 and, for the contracts exceeding USD 1 million, to disclose the beneficial ownership information of contracted companies. We will also undertake a monthly internal audit as well as a specific audit of COVID-19 related expenditures as part of the annual control of audit of the Audit Court, which should be published. To ensure resource revenue transparency and in line with commitments with the EITI of which DRC is a member, a presidential ordinance will be signed confirming the appointment of the National EITI Coordinator approved by the Council of Ministers on March 13. In addition, the monthly payments of the operating allowance of the DRC EITI will resume to allow the resumption of its work. Furthermore, the government's commitment to fight against corruption in DRC is shown by the recent issuance of a decree establishing an anti-corruption agency and also by the intention to publish and implement an anti-corruption action plan based on ongoing governance and safeguards assessments."</p>	
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<b>Djibouti</b>	<b>RCF</b>	<p>“To foster transparency of accounting and management of resources, we will outline the new measures in a supplementary budget expected to be submitted to Parliament in May. We are also committed to continuing to adhere to the best fiscal management practices and to ensuring that the best possible use is made of the resources provided by the IMF and our other partners. To do so, we will (i) publish on the Ministry of Budget’s website, once they are signed, procurement contracts of COVID-19 expenditures in excess of US\$100,000 as well as the beneficial ownership of the selected companies, and (ii) commission an independent ex-post audit of COVID-19-related spending in about a year’s time and publish the results.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 21-22</p>
<b>Dominican Republic</b>	<b>RFI</b>	<p>“... we commit to adhere to best practices in procuring and awarding contracts related to the pandemic as well as publishing an externally audited report on virus-related expenditures once the crisis is over.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 27</p>
<b>Ecuador</b>	<b>RFI</b>	<p>“We remain committed to implementing strong control, reporting, and transparency requirements concerning public sector finance statistics and crisis-related government spending. Ecuador will continue to comply with the Fund’s safeguards policies. We are committed to the highest level of governance to help safeguard the</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 50</p>

		<p>resources committed to fight the pandemic, including (i) by regularly publishing on the government's website (SERCOP) COVID-19-related public procurement contracts and related documents, including the names of the awarded companies and their beneficial owners, and ex-post validation of delivery, as well as information on all other COVID-19 related spending; and (ii) by undertaking an independent audit of COVID-19-related spending by the Office of the Comptroller General by mid-2021 and publishing the results. Any additional spending and or initiatives to combat the pandemic will be subject to similar assurances."</p>	
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<p><b>Egypt</b></p>	<p><b>RFI</b></p>	<p>“In the interest of transparency and accountability, we will continue to track and report all crisis-related spending, including through our various fiscal documents published throughout the budget cycle in line with international best practices. We intend to publish all crisis-related spending in a consolidated manner on the ministry of finance web site and we will publish government procurement plans and awarded contracts for the emergency responses to COVID-19, including the names of the awarded companies and information on beneficial ownership in accordance with the applicable law. As is customary, the State Audit Authority will audit crisis-mitigating inflows and spending including ex-post validation of delivery, and publish the results after the end of the fiscal year in line with our constitutional mandate.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 39</p>
<p><b>El Salvador</b></p>	<p><b>RFI</b></p>	<p>“We remain committed to strengthen competitiveness by improving the business environment, reduce public debt, combat corruption, and strengthen the financial supervision and regulatory framework, and the governance and AML/CFT frameworks.”</p> <p>The staff report also notes that the president assigned the International Commission Against Impunity in El Salvador (CICIES) to</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 27</p> <p>and</p> <p><a href="#">Staff Report</a></p> <p>Page 4</p>

		inspect the COVID-19 emergency funds and nominated a Committee in Charge and Accountable for Administering the Fund.	
<b>Eswatini</b>	<b>RFI</b>	<p>First, we fully recognize the importance of ensuring that financial assistance and budget allocations to support COVID 19-related spending are used for intended purposes. To that end, we will: (i) use specific budget lines to facilitate the tracking and reporting of the release of funds of all crisis-mitigation spending, and (ii) publish on the National Disaster Management Agency (NDMA)'s website (<a href="http://www.ndma.org.sz">www.ndma.org.sz</a>) bi-monthly reports on funds released and expenditures incurred for health, social and other crisis-mitigation spending; (iii) regularly publish, on the Eswatini Public Procurement Regulatory Agency (ESPPRA)'s website (<a href="http://www.sppra.co.sz">www.sppra.co.sz</a>), signed public procurement contracts for crisis-mitigation spending, along with the names of awarded legal persons and their beneficiary owners, and ex-post validation of delivery; in addition, (iv) the Auditor General will undertake a financial and compliance audit of all crisis-mitigation spending and related procurement processes using independent external audit companies and will publish the results within six-months from the end of the 2020/21 fiscal year. Moreover, the Eswatini Public</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 37</p>

		<p>Procurement Regulatory Agency (ESPPRA) will undertake separate compliance and value-for money audits of all procurement activities related to COVID-19 spending, and publish the result on its website. [...]</p> <p>Finally, the government continues to support the strengthening of the Anti-Corruption Commission.</p> <p>Despite the fiscal constraints, the funding to the agency has increased in the last two years to support the upgrading of its systems, building staff capacity, and accelerate the solution of pending cases.</p>	
<b>Ethiopia</b>	<b>RFI</b>	<p>"We commit to a transparent and accountable delivery of policy measures to respond to COVID-19 health and economic challenges and to effectively mitigate corruption concerns. Targeted measures will include (i) publishing all public contracts related to the COVID-19 response, using open and competitive bidding and strictly limiting the use of emergency non-competitive processes to the extent possible; (ii) publishing online eligibility criteria and budgeted limits for the various relief measures as soon as they are adopted; (iii) channeling donor funding through the budget with full transparency on its utilization; (iv) frequent monitoring of spending on crisis mitigation measures at the end of each month for the duration of the crisis; and (v) making information on how emergency relief funds are spent available to internal auditors</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 26-27</p>



		<p>the on-line publication of all related procurement contracts, along with the beneficial ownership information for the legal persons receiving those contracts, within thirty days of each contract award, and the on-line publication of ex post reports on the delivery of these procurement contracts. Moreover, we will commission a reputable firm to conduct an independent, third-party audit of all government expenditures and procurement tenders linked to the pandemic, which will be finalized with the support of the Court of Accounts, whose independence is enshrined in the constitution and law, and will publish the outcome on-line within nine months of the end of each relevant fiscal year. Budget execution reports will continue to be published on a quarterly basis, with specific information on pandemic related spending.”</p>	
<b>Gambia</b>	<b>RCF</b>	<p>“We will ensure full transparency and proper budget procedure with regard to the use of emergency assistance, including the procurement and contracting of crisis-related purchases. In the current circumstances, we use the provisions under the Public Finance Act that allow us to proceed with spending reallocations within the existing budget and create a temporary fund (within the treasury single account) through which the additional emergency spending could be channeled, subject to clearly established allocation criteria and reporting requirements. Once the situation normalizes and the total fiscal cost of addressing</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 23</p>

		<p>COVID-19 can be assessed, we will proceed with the preparation of a comprehensive supplementary budget and a full audit of the emergency spending. This will safeguard budget transparency and ensure that all the 2020 priorities are appropriated and paid for in 2020 to the extent of the financing available. This will also prevent creating undue spending pressures in the 2021 budget.”</p>	
<b>Grenada</b>	<b>RCF</b>	<p>“We concur with Fund staff that strengthening institutions and promoting good governance, transparency and accountability, and tackling corruption are crucial for inclusive and sustainable growth. We are keen to ensure that the best possible use will be made of the funds provided by the IMF. As envisioned in the supplementary 2020 budget, resources received from the development partners will be earmarked for specific COVID-19-related expenses. Accurate and timely information will be provided to the public with regard to that use.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 3</p>
<b>Guatemala</b>	<b>RFI</b>	<p>“To ensure the transparent and effective use of resources, we commit to publish: (i) quarterly reports of COVID-19 related expenditures on the website of the Ministry of Public Finance and all related signed procurement contracts (www.guatecompras.gt), including the names of awarded companies and the name(s) of their beneficial owner(s) as well as an ex-post validation of delivery; and (ii) the audit report by an</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 31</p>

		independent external auditor of RFI-financed spending no later than six months after the end of the fiscal year.”	
<b>Guinea</b>	<b>RFI</b>	<p>“We are committed to ensure the appropriate use and monitoring of resources to respond to the COVID-19 emergency. We have strengthened our public financial management and anti-corruption framework under the ECF arrangement. Furthermore, we are creating a budgetary fund that will account for all earmarked external and domestic resources to address the pandemic. Furthermore, we have established a dedicated account, as part of the Treasury Single Account at the central bank, to receive and disburse COVID-19 funds. We will publish monthly reports on the execution of COVID-19 related spending and the inspectorate-general for finance will conduct timely ex-post control of high-risk expenditures, with the involvement of civil society. We will publish online, on the websites of the Ministry of Economy and Finance and the Ministry of Budget, all awarded procurement contracts for COVID-19 related projects, including the names of entities and their beneficial owners. Furthermore, the Court of Accounts will conduct a full audit of COVID-19 spending (including ex-post validation of goods and services procured), which will be also published online by June 2021.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 29</p>

<p><b>Haiti</b></p>	<p><b>RCF</b></p>	<p>“We [...] intend to strengthen efforts to combat corruption and advance governance reforms, notably through more comprehensive, transparent and tightly managed budget processes and improved reporting systems, both at the ministry of economy and finance and the central bank. In this respect, we will immediately strengthen standard budget reporting by better documenting the different phases of execution of public spending of COVID-19 resources, through the preparation of monthly budget execution reports of all COVID-19 expenditures. We will then move to expand such reforms to the rest of the budget under an SMP and eventually a successor Fund-supported program. We will also undertake a thorough ex post financial and operational audit of all COVID-19 related operations. These efforts will contribute to strengthening accountability and transparency in public finance management and also help us draw useful conclusions on ways to build a better social safety net and boost emergency response capability.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 21</p>
<p><b>Jamaica</b></p>	<p><b>RFI</b></p>	<p>“We will continue to adhere to best practices in procurement and contract awards related to the pandemic, ensuring transparency and ease of tracking of COVID-19 expenditures in the budget. Key information on procurement contracts, including beneficial ownership information of awarded</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 26</p>

		companies, will be publicly available. Moreover, the authorities will request that the Auditor General's Department undertakes and publishes an ex-post audit of COVID-related spending."	
<b>Jordan</b>	<b>RFI</b>	"In the spirit of good governance and transparency, we will: (i) create specific budget lines to facilitate tracking and reporting the released funds and the incurred expenditures; (ii) link the fund to the TSA; (iii) publish on the government website procurement plans, notices and awarded contracts, including beneficial ownership of awarded entities, for the emergency responses; and (iv) undertake ex-post audits of all crisis-mitigating inflows and spending by Jordan's Audit Bureau, and publish the results within 6 months from the end of the fiscal year."	<a href="#">Letter of Intent</a>  Pages 32-33
<b>Kenya</b>	<b>RCF</b>	"We recognize the importance of safeguarding IMF and other financial assistance resources to ensure that such assistance is used for the very urgent purpose of resolving the current crisis. With that in mind, we commit to post-crisis auditing by our independent audit office of samples of crisis-related expenditures and publication of the results. More generally, we are strongly committed to ensuring effective and transparent use of public funds. To this end, we are working to strengthen our	<a href="#">Letter of Intent</a>  Page 24

		institutions and our capacity to detect illicit enrichment and to address conflict of interest in line with international best practices and Fund advice.”	
<b>Kyrgyz Republic</b>	<b>RFI/RCF</b>	<p><i>First request:</i> “To ensure the quality of this additional spending in the health sector, we commit to subject the procurement of urgently needed medical supplies to an ex-post audit by the Audit Chamber, of which the results will be published on the website of the Ministry of Finance”</p> <p><i>Additional commitments in the second request, which apply also to spending financed by the first request:</i> “To address the economic and health consequences caused by the COVID-19 crisis, we are implementing the broad set of measures that we outlined in the March 2020 Letter of Intent. In addition, we will increase procurement transparency to ensure that the aid received is efficiently spent on addressing the crisis. To ensure the quality of emergency spending in the health and other sectors, we commit to subject all procurement of urgently needed supplies to an ex-post audit by the Audit Chamber, of which the results will be published on the website of the Ministry of Finance. In addition, we will publish documentation on all direct procurement and bidding documents for competitive procurement, including those of</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 25</p> <p><a href="#">Letter of Intent</a></p> <p>Pages 10-11</p>

		<p>state-owned enterprises and joint stock companies with state shares of more than 50 percent and their subsidiaries, on the Public Procurement portal. We will take the necessary measures within the government’s prerogative to publish ex-post validation of delivery along with the name of awarded companies and their beneficial owner(s) for all public procurement contracts. We will ensure that the Independent Complaints Review Commission on procurement has sufficient means to operate by including its fees on the list of government payable services.”</p>	
<b>Lesotho</b>	<b>RFI &amp; RCF</b>	<p>The government is committed to enhance governance and transparency in the use of public resources. In this regard , we are committed to (i) publish quarterly reports on budget implementation, including specific budget lines accounting of expenditures for COVID-mitigation measures, (ii) having internal audit on a quarterly basis focusing on the COVID related expenditure, (iii) a full audit by the Auditor General of the revised FY2020/21 budget, including a targeted audit of covid-19 related expenditure, with the results to be published and disseminated within 5 months after the end of the fiscal year, and (iv) publish, on the government’s website, signed procurement contracts for crisis-mitigation spending, the names of the companies awarded these</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 24-25</p>

		contracts and their beneficial owners, and ex-post validation of delivery. More broadly, we are committed to submit the following bills to the parliament: (i) Anti-corruption Bill (the draft bill is complete), (ii) PFM Bill (at advanced stage), and (iii) and Procurement Bill.	
<b>Liberia</b>	<b>RCF</b>	<p>"Given the need for transparency and accountability in the use of resources, we commit to having the General Audit Commission conduct a post-crisis audit of all the crisis response spending within a year of the approval of the RCF disbursement. This action will not only ensure that the crisis spending is not wasted but will also provide lessons that will be needed to further strengthen our existing systems to effectively respond to crisis situations as well as public sector spending more broadly in the post-crisis period. For transparency, we will publish the results of the audit online within two weeks of its finalization. We will also publish on the government's website all procurement contracts paid from the budget in the remainder of FY2020 and all of FY2021 above a value of US\$200,000 for goods, above US\$400,000 for works, and above US\$100,000 for services, along with the names of the companies awarded the contract, their beneficial owners, and validation of delivery of the goods and services specified in the contracts."</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 39-40</p>

<p><b>Madagascar (2<sup>nd</sup> RCF)</b></p>	<p><b>RCF</b></p>	<p>“ [...] we reiterate our strong commitment to an effective and transparent use of public funds, and to ensure that the aid received, including from the RCF disbursement, and the resources freed up by the DSSI, are efficiently spent on addressing the crisis. With this objective, we have increased the coordination and consistency of the COVID-19 response by adopting a Multisectoral National Response Plan. In addition, we have finalized a decree establishing the “COVID-19 Pandemic Response Fund”, with technical assistance from the Fund, defining its resources, and the associated framework for operational management, for control and accountability. The objective is to strengthen the transparency and traceability of resources and public spending to deal with the pandemic. We commit to publish on-line, for all contracts and financial transfers related to the pandemic response, (i) the list of financial transfers, (ii) the signed procurement contracts, (iii) the legal entities receiving those contracts, and the names of the entities’ beneficial owners, and (iv) ex post reports on the delivery of these procurement contracts. We will also commission an independent third-party audit of those contracts, which will be published on-line by end-December 2021. Budget execution reports will continue to be published on a quarterly basis, with specific information on pandemic related</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 27-28</p>
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		<p>spending. Finally, the “Cour des Comptes”, in consultation with external/third-party auditors, will proceed to an independent audit of the emergency fund for 2020 and produce a report, which will be also published on-line by end-December 2021.”</p>	
<b>Malawi</b>	<b>RCF</b>	<p><i>First request:</i> “We will ensure that all government spending to manage and contain the impact of the COVID-19 pandemic is transparent and efficient. In line with our existing practices, we will regularly publish procurement documentation (including tenders, bids, and names of awarded companies, products or services procured and their costs) on the Public Procurement and Disposal of Assets (PPDA) website—this applies to all competitive bids and direct procurement by all Ministries, Agencies and Departments (MDAs). To ensure enhanced transparency and accountability, we will also publish on the PPDA website the names of the beneficial owners of the awarded companies and the results of a thorough ex-post validation of delivery; we will publish (on the Ministry of Finance website and in the press) quarterly statements on commitments and payments of COVID-19 related activities (in all MDAs); and we will specify COVID-19 related costs in our published monthly salary report (costs of hiring additional medical staff, risk allowances) as well as in our budget funding and cash</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 26</p>

		<p>management analysis. The National Audit Office will submit quarterly audits of COVID-19 related spending (across all MDAs) to the Minister of Finance (for submission to Cabinet) and, once the pandemic abates, will publish and submit to Parliament a comprehensive audit of COVID-19-related spending (across all MDAs and ADMARC)."</p> <p><i>Additional commitments in the second request, which apply also to spending financed by the first request:</i> "While continuing to implement the measures outlined in our April 27, 2020 Letter of Intent, we reiterate our strong commitment to an effective and transparent use of public funds, and to ensure that the aid received, including from the RCF disbursement, and the freed resources from the CCRT and DSSI, are efficiently spent on addressing the crisis. Specifically, we are regularly publishing procurement documentation—including tenders, bids, and names of awarded companies, products or services procured and their costs, and names of the beneficial owners of the awarded companies — on the Public Procurement and Disposal of Assets (PPDA) website (<a href="https://www.ppda.mw/#">https://www.ppda.mw/#</a>). This applies to all COVID-19 related competitive bids and direct procurement by all Ministries, Agencies and Departments (MDAs). To ensure enhanced transparency and accountability, we are also publishing on the PPDA website the results of ex-post validation of delivery on a contract-by-contract basis; we will</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 28</p>
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		<p>publish (on the Ministry of Finance website and in the press) quarterly statements on commitments and payments of COVID-19 related activities (in all MDAs, within 90 days after the end of each quarter, beginning with FY 2019/20Q4); we will specify COVID-19 related costs in our published monthly salary report (costs of hiring additional medical staff, risk allowances, all within 3 weeks after the end of each month, beginning with the September 2020 report) as well as in our monthly budget funding and cash management analysis; and we will publish funding earmarked for COVID-19 related spending, including revenues from any new taxes and disbursements of development partner grants and loans (within 3 weeks after the end of each month, beginning with revenues for September 2020). The National Audit Office will submit quarterly audits of COVID-19 related spending (across all MDAs) to the Minister of Finance (within 180 days after the end of each quarter, beginning with FY 2019/20Q4) for submission to Cabinet and, once the pandemic abates, will publish and submit to Parliament a comprehensive audit of COVID-19-related spending (across all MDAs and the Agricultural Development and Marketing Corporation (ADMARC), within 180 days after the end of the pandemic)."</p>	
<b>Maldives</b>	<b>RCF</b>	<p>"... we remain committed to working closely with the Fund to ensure that fiscal reporting and transparency meet the latest international standards and best practices, improving our fiscal responsibility framework, as well as strengthening the operation and risk supervision of</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 29</p>

		state-owned enterprises. [...] We are committed to ensuring maximum effectiveness of the COVID-19 measures by targeted assistance programs and strong governance and transparency in their implementation.”	
<b>Mali</b>	<b>RCF</b>	“In line with our commitment to strengthening institutions and promoting good governance, we are keen to ensure that the best possible use will be made of the funds provided by the developmental partners, the international finance institutions, the private sector and Malian citizens and, to that effect, we will enhance mechanisms of reporting and controls for the disbursement of funds. We commit to report quarterly on the spending of these funds and to commission an independent and robust third-party audit of this spending in about a year’s time and publish its results. The Government will also publish regularly on its website documentation on large public procurement projects, together with ex-post validation of delivery along with the name of awarded companies and the name of their beneficial owner(s).”	<a href="#">Letter of Intent</a>  Page 25
<b>Mauritania</b>	<b>RCF</b>	“We will maintain all spending on-budget and make sure to track, account for, and report in a transparent manner the resources deployed for emergency response. To avoid any misappropriation of funds, we will carefully control emergency spending and will	<a href="#">Letter of Intent</a>  Page 22

		publish information on the ministry of finance’s website regarding public procurement contracts related to crisis mitigation, the names of the awarded companies and their beneficial owners, and ex-post validation of delivery. We will ask the Court of Accounts to audit emergency spending once the crisis abates and to publish its results.”	
<b>Moldova</b>	<b>RFI/RCF</b>	“We are committed to implementing strong control, audit, reporting, and transparency requirements with regards to crisis-related government spending, including by publishing information on associated public procurement and beneficial owners of companies contracting with the government as well as continuing to enforce the AML framework and asset declaration regime. We will subject all crisis-mitigation spending to a dedicated audit by the Court of Accounts Chamber and commit to making the audit report public.”	<a href="#">Letter of Intent</a>  Page 30
<b>Mongolia</b>	<b>RFI</b>	“The government will continue to publish information on revenue and expenditure performance on a regular basis. Especially, the government will provide a separate reporting mechanism for those Covid-19 expenditures outlined in the table below. To this end, we will publish quarterly reports on these Covid-19 expenditures on the website of the Ministry of Finance (MOF) and commission an independent third-party audit of this spending within six months of disbursement and publish the	<a href="#">Letter of Intent</a>  Page 33

		<p>results on the website of the MOF. The published results will include the full text of all related procurement contracts, including the names of the awarded companies and their beneficial owners, and an ex-post validation of delivery.”</p>	
<b>Montenegro</b>	<b>RFI</b>	<p>“To promote transparency and good governance, the State Audit Institution of Montenegro will audit crisis-mitigating spending (which will include ex-post validation of delivery of goods and services) and publish the results online within 12 months of the end of the fiscal year, in accordance with our laws. We will also publish online all public procurement plans, notices, and awarded contracts for crisis-mitigation spending in a timely manner, including the names of the entities awarded contracts and their beneficial owners. [...] To operationalize the strongest possible risk-based AML framework, we have adopted a new AML/CFT law with new guidelines for banks on AML/CFT.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 26-27</p>
<b>Mozambique</b>	<b>RCF</b>	<p>“We are committed to reforms to strengthen governance, transparency and accountability in line with recommendations of the Government’s diagnostic report published in August 2019. Also, we will undertake an independent audit of crisis-mitigation spending and related procurement processes once the crisis abates and will publish its results. We will also publish on the government’s website large public procurement contracts related to</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 22-23</p>

		crisis mitigation, the names of the awarded companies, their beneficial owners, and ex-post validation of delivery.”	
<b>Myanmar</b>	<b>RCF/RFI</b>	<p>“Regarding Anti Money Laundering and Combatting the Financing of Terrorism, we will continue to work with the Asia Pacific Group on the agreed time bound remedial Action Plan to remove Myanmar from its enhanced monitoring list. [...] In addition to our continuous efforts to strengthen the effectiveness of the anti-corruption and governance frameworks, we are committed to ensuring that crisis resources are used transparently and effectively. Toward that end, we will publish on the MOPFI website (i) quarterly reports on all COVID-19 related expenditure; (ii) the results of a targeted audit of COVID-19 related expenditures by the Office of the Auditor General for Myanmar (OAGM) within 6 months of the end of the fiscal year; (iii) information on procurement contracts on COVID-19 related expenditure within 3 months of being signed above Kyat 100 million, including the names of the companies awarded and their beneficial owners, the specific nature of the goods or services procured, price per unit, and the overall contract amount; and, (iv) reports of ex post validation of delivery related to (iii). The ADB will also assist us in publishing CERP</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 30-31</p>

		progress reports.”	
<b>Nepal</b>	<b>RCF</b>	<p>“We recognize the importance of good governance, transparency and accountability, and tackling corruption and related money laundering. We commit to ensure that the funds provided by the IMF will be effectively used to safeguard public health, save lives, support livelihoods, and support the economic recovery. To that effect, we will put in place transparent and accountable reporting mechanisms and controls for public purchases and contracting processes. In this regard, we commit to report quarterly on the spending of these funds and to commission an independent audit by the Office of Auditor General of Nepal of COVID-19 related spending in about a year’s time. We will publish the quarterly reports and audit results on the website of the implementing agencies. We will also publish on the implementing agency website large public procurement documentation together with ex-post validation of delivery along with the name of awarded companies and the name of their beneficial owner(s). All COVID-19 related expenditures will be allocated and executed using existing public financial management processes and within legislated</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 22-23</p>

		frameworks. The allocation details will be made public on the Ministry of Finance website.”	
<b>Niger</b>	<b>RCF</b>	“The government will refrain from crisis measures that would permanently damage the revenue base, maintain fiscal transparency by enshrining fiscal crisis measures in a supplementary budget, centralize the costing and the keeping count of crisis measures at the Ministry of Finance, recognizes the importance of ensuring that financial assistance received is used for its intended purposes, and accelerate the implementation of reforms for better access to credit and stronger social protection, which are now more urgent than ever.”	<a href="#">Letter of Intent</a>  Page 37
<b>Nigeria</b>	<b>RFI</b>	“Our anti-corruption efforts will continue unabated. We will strengthen the role of the Federal Audit Board in combating corruption and are committed to strengthening the asset-declaration framework and fully implementing the risk-based approach to AML/CFT supervision while ensuring the transparency of beneficial ownership of legal persons. We fully recognize the importance of ensuring that financial assistance received is used for intended purposes. To that end, we will (i) create specific budget lines to facilitate the tracking and reporting of emergency response expenditures	<a href="#">Letter of Intent</a>  Page 33

		<p>and report funds released and expenditures incurred monthly on the transparency portal (<a href="http://opentreasury.gov.ng/">http://opentreasury.gov.ng/</a>); (ii) publish procurement plans, procurement notices for all the emergency response activities—including the name of awarded companies and of beneficial owners—on the Bureau of Public procurement website; and (iii) publish no later than three to six months after the end of the fiscal year the report of an independent audit into the emergency response expenditures and related procurement process, which will be conducted by the Auditor General of the Federation—who will be provided the resources necessary and will consult with external/third party auditors.”</p>	
<b>Pakistan</b>	<b>RFI</b>	<p>“To ensure the quality of the additional spending in the health sector, we commit to subject the procurement of urgently needed medical supplies to an ex-post audit by the Auditor General of Pakistan, the results of which will be published on the website of the Ministry of Finance. [...] We will continue to strengthen governance by enhancing the effectiveness of anti-corruption and AML/CFT frameworks.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 30</p>

<p><b>Papua New Guinea</b></p>	<p><b>RCF</b></p>	<p>“Under recently implemented emergency COVID-19 directions, the government’s State of Emergency Controller posts details of all procurements awarded on the government procurement website (<a href="http://www.procurement.gov.pg/">http://www.procurement.gov.pg/</a>) within a week of procurement, including the names of the entities awarded the contract and their beneficial owners, the specific nature of the goods or services procured, their price per unit, and the overall contract amount, as well as reports of ex-post validation of delivery. The relevant information through May 11 has been posted on May 18 (prior action). Additionally, the Government has recently ensured that COVID-19 expenditure reports are presented to the Budget Management Committee on a weekly basis with the first report circulated on May 18 (prior action). A consolidated report will be submitted to the National Executive Council and published within three months of the end of the emergency. The government further commits to commission and publish an audit, conducted by a reputable independent auditor, of COVID-related spending within a year of the end of the emergency.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 24</p>
<p><b>Paraguay</b></p>	<p><b>RFI</b></p>	<p>“A recent mission by the IMF and IDB has helped us assess vulnerabilities to corruption. We will use the findings of the mission to develop a strategy to combat corruption and improve</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 25</p>

		governance.”	
<b>Rwanda (2<sup>nd</sup> RCF)</b>	<b>RCF</b>	<p>“We are [...] committed to effective and transparent use of public funds, including funds from the RCF. We will carry out transparency of procurement in accordance with the Law Governing Public Procurement and our E-procurement system. The E-Procurement system provides publicly available information [Hyperlink in text: <a href="http://umucyo.gov.rw/index.do">http://umucyo.gov.rw/index.do</a>] on all awarded government contracts, including the name of companies that participated in the tender, each initial bid, the name and price of the winning bid, the total amount of the contract, and the delivery period. Moreover, following our Law on State Finances and Property 2013 (Organic Budget Law), the Office of the Auditor General, whose independence is enshrined in the constitution and law, will audit all government expenditures and procurement tenders, including those linked to the pandemic, and publish the outcome.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 22</p>
<b>Samoa</b>	<b>RCF</b>	<p>“Overall, we are committed to ensuring maximum effectiveness of our policy response to COVID-19 by targeted assistance programs, involving strong governance and transparency in their implementation.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 29</p>

<p><b>Sao Tome and Principe</b></p>	<p><b>RCF</b></p>	<p>“We will ensure proper monitoring of all expenditure relating to the pandemic and improve transparency in public procurement. The government will ensure adequate control of total pandemic-related expenses and adopt measures by end-April 2020 to ensure better transparency and publicity regarding public procurement, particularly by publishing on the website of Ministry of Finance (MOF) or through announcements on other media (i) public procurement contracts, once signed, that require prior authorization from the Court of Accounts as per the Organic Law (no. 11/2019) and the ex-post validation of delivery of the contracts and (ii) monthly COVID-19 related expenditure. The crisis mitigation measures described in paragraphs 5-7 have been authorized by the parliament, and a revised budget consistent with the above policies will be submitted to parliament when conditions allow, at the latest by end-July. The government will also conduct an independent audit of spending after the crisis abates and publish the results to confirm that funds were used for their intended purpose.”</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 17</p>
<p><b>Senegal</b></p>	<p><b>RCF/RFI</b></p>	<p>The government is committed to ensure transparency and accountability in emergency expenditures as follows: (i) publishing all related tenders and clarifying procurement procedures; (ii) publishing the list of successful</p>	<p><a href="#">Program Statement</a> (PCI 1<sup>st</sup> review that occurred not long after the RCF was approved) Page 49</p>

		<p>bidders on government contracts; (iii) establishing expenditure controls; (iv) ensure that the execution of expenditure related to COVID-19 is officially accounted for through quarterly budget execution reports; (v) through the annual audit of government contracts, verify the regularity of procurement procedures applicable to COVID-19-related expenditures and publish the results; and (vi) in the report on execution of the 2020 budget, entrust the Audit Office (Cour des comptes) with preparing a special report on execution of COVID-19-related expenditures.</p>	
<b>Seychelles</b>	<b>RFI</b>	<p>"We are [...] committed to ensure transparency of the COVID-19 related emergency fiscal spending and will submit monthly reports of the emergency spending on wage subsidies, health, and social spending to Finance Public Accounts Committee (FPAC) of the National Assembly. These reports will be made public within three months. Furthermore, we will undertake an independent audit of emergency spending and related procurement processes and publish its results."</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 29</p>
<b>Sierra Leone</b>	<b>RCF</b>	<p>"In addition to ongoing reforms to strengthen our AML/CFT and anti-corruption frameworks, we will be putting in place strong and targeted measures. More precisely, we are introducing mechanisms for regular monitoring and reporting on the use of funds. Our Anti-Corruption</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 27</p>

		<p>Commission launched the COVID-19 Response Transparency Taskforce to ensure integrity, accountability and transparency in the use and management of funds. The Government also established a COVID-19 account to focus on delivering effectively our emergency response. In this regard, we have already begun regular reporting on the use of these emergency funds. We intend to further refine the coverage of these reports, and follow best practices in the management, reporting, and oversight of these accounts with the benefit of ongoing TA from IMF's Fiscal Affairs Department and AFRITAC West 2. In addition, the Audit Service Sierra Leone will audit the management of the COVID-19 Fund and COVID-19 response, and publish its report online, within 12 months of the end of the fiscal year as required under the Constitution and laws of Sierra Leone, including the PFM Act 2016. Finally, we also plan to publish on the Government's website large public procurement contracts related to crisis mitigation, the names of the companies awarded contracts, their beneficial owners, and ex-post validation of delivery."</p>	
<p><b>Solomon</b></p>	<p><b>RCF/RFI</b></p>	<p>"We recognize the importance of good governance, transparency and accountability, and tackling corruption and related money laundering. We commit to ensure that the funds provided by the IMF will be effectively used to maintain</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 20</p>

<b>Islands<sup>2</sup></b>		macroeconomic stability, thus safeguarding public health, saving lives, and supporting livelihoods and the economic recovery. Towards that end, we will publish on the Ministry of Finance and Treasury's website: (i) results of an audit by the Solomon Islands Office of the Auditor General of COVID-19 related expenditures before December 2021; and (ii) documentation on crisis-related public procurement, including the nature of the goods or services procured, the contract amounts, the names of the entities awarded the contract and their beneficial owners, followed by documentation on ex-post validation of delivery."	
<b>South Africa</b>	<b>RFI</b>	On governance, meaningful reforms are being implemented in the South African Revenue Service, the Public Investment Corporation, and other institutions. New leadership has been appointed in various public entities; policies and procedures are being reviewed; and prosecution agencies have been given additional capacity to investigate and hold wrong-doers accountable. New procurement legislation, aimed at consolidating rules and management of the public procurement system within one framework, is set to be presented to parliament during the current fiscal year. Moreover, in line with the	<a href="#">Letter of Intent</a>  Pages 44-45

<sup>2</sup> Although the emergency financing is for balance of payments support, the authorities also committed to a Central Bank safeguard assessment.

		Public Financial Management Act, we are committed to transparently plan, use, monitor and report all Covid-19 related spending to ensure it reaches the targeted objectives, by: (1) publishing on a regular basis the execution of Covid-19-related expenditures, auditing such expenditure, including ex-post valuation of delivery, within 12 months of the end of the fiscal year, to be performed by the Auditor General and publishing the findings; and (2) publicly disseminating all Covid-19-related procurement contracts and allocation (with details about awarded companies and their beneficial owners).	
<b>St. Vincent &amp; the Grenadines</b>	<b>RCF</b>	"We commit to publish procurement documentation including information on the beneficial owners of the companies that receive crisis-related procurement contracts, to report monthly on COVID-related expenditures, and to undertake a full ex-post financial and operational audit of COVID-19 spending at the time of the annual audit."	<a href="#">Letter of Intent</a>  Page 2
<b>Tajikistan</b>	<b>RCF</b>	"The Government is committed to enhancing governance and ensuring transparency and accountability in this process. We will ensure any funds provided for addressing the impacts of COVID-19 will be put to best possible use. We have created a high-level Inter-agency Task Force, chaired by Deputy Prime Minister and comprised of Ministries of Health, Transport, Foreign Affairs, National Security, and other	<a href="#">Letter of Intent</a>  Page 21

		<p>government agencies. The Task Force has launched an action plan to respond to COVID-19, including through border and sanitary control, quarantine, and treatment facilities. The Task Force will guide spending decisions, and the usual budgetary procedures and controls will apply. We will prepare quarterly reports on the spending of emergency funds and publish the results on the external website of the Ministry of Finance. In addition, to ensure quality of this additional spending, we will subject the health spending, including procurement of urgently needed medical supplies, and social spending to ex-post audits by the Chamber of Accounts and ex-post validation of deliveries in a year's time, which will also be published on the external website of the Ministry of Finance. The government will also improve the transparency of its procurement processes in line with international best practices."</p>	
<b>Tunisia</b>	<b>RFI</b>	<p>"[...] we will [...] enforce the rule of law and advance in the fight against corruption and improve public services especially in the areas of education, health, and digitization."</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 38</p>
<b>Uganda</b>	<b>RCF</b>	<p>"To foster transparency of accounting and management of resources, we will provide a separate reporting mechanism for COVID-19 expenditures in the context of our Program Based Budgeting that will allow for clear tracking of the support received by</p>	<p><a href="#">Letter of Intent</a></p> <p>Pages 26-27</p>

		<p>partners. UDB will also report on the use of the funds received. We are also committed to continuing to adhere to the best fiscal management practices and to ensuring that the best possible use is made of the funds provided by the IMF, and we commit to anti-corruption safeguards. To that effect, we commit to (i) publishing, once they are signed, documentation on the government’s website of large procurement contracts—defined as contracts above Ush500 million for works contracts, and above Ush200 million for goods and services—of COVID-19 expenditures, together with the names of awarded companies and their beneficial owners and (ii) undertaking an independent audit of COVID-19 expenditures in about a year’s time, which will include an ex-post validation of delivery of the large procurement contracts, and publishing the results.”</p>	
<b>Uzbekistan</b>	<b>RFI/RCF</b>	<p>“As part of Uzbekistan’s five priorities for development, we aim to improve governance and public management. The government is also committed to combating corruption and improving the efficiency of its anti-corruption efforts, including by increasing the accountability and transparency of government. To ensure transparent and effective use of resources deployed for COVID-19 shocks, we will: (i) appropriate COVID- 19</p>	<p><a href="#">Letter of Intent</a></p> <p>Page 26</p>

		<p>emergency measures through the Anti-Crisis Fund; (ii) publish reports of COVID-19 related expenditures on a monthly basis on the Ministry of Finance website (<a href="http://www.mf.uz">www.mf.uz</a>); (iii) publish on the Ministry of Finance website (<a href="http://www.mf.uz">www.mf.uz</a>) COVID-19 related signed public procurement contracts and related documents, including the names of companies awarded those contracts and ex-post validation of delivery and will continue to improve our procurement framework expeditiously in line with international best practice, including by publishing information on beneficial owners; and (iv) ensure the Financial Control Department of the Ministry of Finance includes all COVID-19 related expenditures in its forthcoming inspections. The Chamber of Accounts will conduct an ex- post audit of COVID-19 expenditures and related procurement processes to ensure funds are spent in accordance with their purpose and procurement regulations and will publish the audit report no later than six months after the end of the fiscal year as part of the regular audit of the 2020 State Budget Report.”</p>	
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