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

Country	Type of Instrument	Commitment	Source
Afghanistan	RCF	"We will do our utmost to ensure effectiveness and	Letter of
		strong governance in implementing crisis-mitigation	<u>Intent</u>
		measures. To ensure full transparency, we commit to	
		publishing quarterly reports on pandemic-related	Page 27
		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."	
Bahamas	RFI	"We will adhere to best practices in procurement	Letter of
		and contract awards related to the pandemic,	<u>Intent</u>
		ensuring transparency and ease of tracking of	
		COVID-19 expenditures in the budget. We have	Pages
		recently re-established the Audit Committee to	29-30
		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	

<sup>&</sup>lt;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 July 27, 2021, 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 <u>here</u>. For the reasons outlined in paragraph 19 of the <u>background paper</u> (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.

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		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."	
Bangladesh	RFI	"We are committed to ensuring that crisis	Letter of
		resources are used transparently and effectively.	Intent
		Toward that end, we will ensure that applicants for	
		COVID-19 related contracts provide their	Pages
		beneficial ownership information to the	32-33
		government and that this 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."	
Benin	RCF	"We reiterate our firm commitment to an effective	Letter of
		and transparent implementation of the COVID-19	Intent
		related spending. In line with our commitments at	
		the time of the ECF augmentation, we have	Pages
		published the list of contracts awarded in the	33-34
		context of the fight against the pandemic. We have	
		also published the key information on these	
		contracts, including the beneficial owners of	
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		awarded companies, as well as the validation of	
		delivery. We will continue to make sure that	
		spending is properly budgeted and that its	
		execution is in line with the international rules of	
		fiscal credibility and transparency. In this context,	
		we are committed to (i) publishing online on a	
		monthly basis the procurement documents and key	
		contract information relating to the major projects	
		implemented under the response plan, indicating	
		the amounts and the names of the beneficial	
		owners of the awarded companies, as well as the	
		validation of delivery, (ii) ensuring that adequate	
		expenditure controls are in place; (iii) ensuring that	
		the execution of expenditure related to COVID-19	
		is officially accounted for through monthly budget	
		execution reports that will be published online. In	
		addition, we will entrust the Accounting Chamber	
		(Cour des comptes) with the audit of the use and	
		effectiveness of the funds committed. This audit	
		will be published by the Accounting Chamber by	
		end-June 2021 and made available on its internet	
		website."	
Bolivia	RFI	"we commit to adhere to best practices in	Letter of
Donvia		procuring and awarding contracts related to the	Intent
		pandemic (including by publishing regularly	mem
		documentation on procurement contracts on the	Page 23
		government's website, together with ex-post	Tuge 25
		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."	
Burkina Faso	RCF	"The government also commits to a transparent and	Letter of
		accountable use of the funds disbursed under the	Intent
		RCF, including by enhancing transparency of	
		health-related expenditures."	Page 35
Cameroon	RCF	First request "We will ensure that the financial	Letter of
	-	assistance received is used for the intended	Intent
		purposes, in strict compliance with the provisions of	
		the Law on the Code for Transparency and Good	Page 21
		the Law on the Code for Transparency and Good	Page 21

	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.	
	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."	
	Additional commitments in the second request, which	Letter of
	apply also to spending financed by the first request:	Intent
	'We reiterate our firm commitment to an effective	
	and transparent use of public funds, and to ensuring	Page 36
	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 approximant and the baneficial	
		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."	
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Central	RCF	"we will ensure that the additional external	Letter of
African		financing we are receiving is used effectively to	<u>Intent</u>
Republic		address crisis-related needs and will undertake an	
		independent audit of the crisis-mitigation spending	Page 22
		after the crisis abates, whose results we will publish."	
Chad	RCF	<i>First request</i> : "We also undertake, under Decree N °	Letter of
		0374 of March 24, 2020 creating a special allocation	<u>Intent</u>
		account entitled "Special Fund for the fight against	
		the Coronavirus" to keep separate accounts for	Page 24
		COVID-19 expenses and provide separate reporting	
		for the transparent management and in accordance	
		with the best budget management practices to	
		which we have always adhered."	
		Additional commitments in the second request,	Letter of
		which apply also to spending financed by the first	Intent
		request: "Resources dedicated to the COVID-19 will	meene
		be used in full transparency. In addition to being	Dage 21
		reflected in the budget law, they will be committed	Page 21
		in line with the CEMAC PFM directives. In particular,	
		emergency spending for urgently needed supplies	
		will be committed according to the provisions of	
		Decree No. 1025/PR/MFB/2020 of May 29, 2020,	
		derogating from public procurement rules	
		concluded in the context of the fight against the	
		coronavirus and subjected to an ex-post	
		compliance audit by a reputable international	
		auditing firm, which will be completed with the	
		support of the Inspectorate of Public Finances	
		within six months of the end of the fiscal year. The	

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		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."	
Comoros	RCF/RFI	"We concur with Fund staff that strengthening	Letter of
	-	institutions and promoting good governance,	Intent
		transparency and accountability, and tackling	
		corruption are crucial for inclusive and sustainable	Page 34
		growth. We are keen to ensure that the best	5
		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	
		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	

Costa Rica	RFI	on its general website in case the website dedicated to procurement should become operational only with a delay." "We are also committed to using the RFI resources	Letter of
		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."	<u>Intent</u> Page 29
Democratic Republic of Congo	RCF	"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 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."	Letter of Intent Page 21

Djibouti RCF "To foster transparency of accounting and	Letter of
management of resources, we will outline the new	Intent
measures in a supplementary budget expected to	
be submitted to Parliament in May. We are also	Pages
committed to continuing to adhere to the best fisca	_
management practices and to ensuring that the	
best possible use is made of the resources provided	4
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."	
Dominican   RFI   " we commit to adhere to best practices in	Letter of
RepublicImage: Second seco	Intent
pandemic as well as publishing an externally audited	
report on virus-related expenditures once the crisis	
over."	
EcuadorRFI"We remain committed to implementing strong	Letter of
control, reporting, and transparency requirements	<u>Intent</u>
concerning public sector finance statistics and crisis-	-
related government spending. Ecuador will continue	Page 50
to comply with the Fund's safeguards policies. We	
are committed to the highest level of governance to	)
help safeguard the resources committed to fight the	<u>è</u>
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	

Equat	RFI	"In the interest of transparency and accountability,	Letter of
Egypt	KFI	we will continue to track and report all crisis-related	
			Intent
		spending, including through our various fiscal	
		documents published throughout the budget cycle	Page 39
		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."	
El Salvador	RFI	"We remain committed to strengthen	Letter of
		competitiveness by improving the business	Intent
		environment, reduce public debt, combat	Page 27
		corruption, and strengthen the financial	-
		supervision and regulatory framework, and the	and
		governance and AML/CFT frameworks."	
			<u>Staff</u>
		The staff report also notes that the president	Report
		assigned the International Commission Against	Page 4
		Impunity in El Salvador (CICIES) to inspect the	
		COVID-19 emergency funds and nominated a	
		Committee in Charge and Accountable for	
		Administering the Fund.	
Eswatini	RFI	First, we fully recognize the importance of ensuring	Letter of
		that financial assistance and budget allocations to	Intent
		support COVID 19-related spending are used for	
		intended purposes. To that end, we will: (i) use	Page 37
		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	
		(www.ndma.org.sz) bi-monthly reports on funds	
		released and expenditures incurred for health, social	
		released and experiordres incurred for health, social	

		and other crisis-mitigation spending; (iii) regularly	
		publish, on the Eswatini Public Procurement	
		Regulatory Agency (ESPPRA)'s website	
		(www.sppra.co.sz), 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 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. []	
		Finally, the government continues to support the	
		strengthening of the Anti-Corruption Commission.	
		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.	
Ethiopia	RFI	"We commit to a transparent and accountable	Letter of
•		delivery of policy measures to respond to COVID-19	Intent
		health and economic challenges and to effectively	
		mitigate corruption concerns. Targeted measures	Pages
		will include (i) publishing all public contracts related	26-27
		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	
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		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 and, as soon as practicable, to independent auditors to conduct ex-post audits over COVID-19 related spending and revenue collection."	
Gabon	RFI	<i>First request:</i> "The government will continue to publish information on revenue and expenditure performance on a regular basis, and to provide a separate reporting mechanism for COVID-19 expenditures in order to assure transparent accounting of all the funding received to combat the pandemic. We commit to report quarterly on the spending of emergency funds and to commission an independent, third-party audit of this spending within six months of disbursement and publish the results. The published results will include the full text of all related procurement contracts, along with the beneficial ownership information for the companies receiving those contracts."	Letter of Intent Page 34
		Additional commitments in the second request, which apply also to spending financed by the first request: "We are [] committed to the effective and transparent use of public funds, including on the use of funds to respond to the COVID-19 pandemic and on the funds from the RFI. We commit to provide a separate reporting mechanism for COVID-19 expenditures in order to assure transparent accounting of all the funding received to combat the pandemic. This commitment includes 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	Letter of Intent Page 35

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		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."	
Gambia	RCF	"We will ensure full transparency and proper budget	Letter of
		procedure with regard to the use of emergency	Intent
		assistance, including the procurement and	
		contracting of crisis-related purchases. In the current	Page 23
		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 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."	
Grenada	RCF	"We concur with Fund staff that strengthening	Letter of
		institutions and promoting good governance,	<u>Intent</u>
		transparency and accountability, and tackling	
		corruption are crucial for inclusive and sustainable	Page 3
		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."	

Guatemala	RFI	"To oncure the transparent and effective use of	Letter of
Guatemala	R.C.I	"To ensure the transparent and effective use of resources, we commit to publish: (i) quarterly reports	Intent
		of COVID-19 related expenditures on the website of	interne
		the Ministry of Public Finance and all related signed	Page 31
		procurement contracts (www.guatecompras.gt),	Tage 51
		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 independent external auditor of RFI-financed	
		spending no later than six months after the end of	
		the fiscal year."	
Guinea	RFI	"We are committed to ensure the appropriate use	<u>Letter of</u>
		and monitoring of resources to respond to the	<u>Intent</u>
		COVID-19 emergency. We have strengthened our	
		public financial management and anti-corruption	Page 29
		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."	
Guinea-	RCF	"In line with the recommendations in the 2020 IMF	Letter of
Bissau		Technical Report on Governance and	Intent
		Anticorruption, which we have published on the	
		Ministry of Finance's website (www.mef.gw), we are	
		committed to strengthen fiscal governance and	Page 36
		transparency to ensure that the additional	
		budgetary allocations related to COVID-19 are	
		spent appropriately. To that end, we have	
		reestablished the Treasury Committee, which	
		recombined the frequery committee, which	

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		approves all expenditure related to COVID-19. In	
		addition, all COVID-19 related spending are	
		managed using a dedicated account at the BCEAO	
		to facilitate traceability and accountability; will be	
		subject to an ex-post independent audit by a	
		reputable third-party auditor who will work jointly	
		with the audit court (Tribunal de Contas) (with the	
		terms of reference to be agreed in consultation with	
		IMF staff) and published within 9 months after the	
		end of the fiscal year on the government's website;	
		and are reflected in the 2020 budget that was	
		summitted and approved by Parliament on	
		September 9, 2020. The government will also	
		publish bimonthly reports on COVID-19	
		expenditure, and all COVID-19 related procurement	
		contracts will be published on the government's	
		website, within one week of the procurement being	
		awarded, with the name of the awarded companies,	
		the names and nationalities of their beneficial	
		owners, the specific nature of the goods or services	
		procured, their price per unit, and the overall	
		contract amount. Delivery reports for goods and	
		services, including the list of suppliers and	
		contractors, will be published on the government's	
		website within three months of the end of the	
		execution period for each contract. We have	
		established reporting processes for the allocation of	
		resources on-lent to the banks to support the	
		cashew nut sector during the pandemic in 2020.	
Haiti	RCF	"We [] intend to strengthen efforts to combat	Letter of
	i i i i i i i i i i i i i i i i i i i	corruption and advance governance reforms,	Intent
		notably through more comprehensive, transparent	merne
		and tightly managed budget processes and	Page 21
		improved reporting systems, both at the ministry of	Tage 21
		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	
		monully 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."	
Jamaica	RFI	"We will continue to adhere to best practices in	Letter of
		procurement and contract awards related to the	<u>Intent</u>
		pandemic, ensuring transparency and ease of	
		tracking of COVID-19 expenditures in the budget.	Page 26
		Key information on procurement contracts,	
		including beneficial ownership information of	
		awarded 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."	
Jordan	RFI	"In the spirit of good governance and	<u>Letter</u>
		transparency, we will: (i) create specific budget	of
		lines to facilitate tracking and reporting the	<u>Intent</u>
		released funds and the incurred expenditures; (ii)	
		link the fund to the TSA; (iii) publish on the	Pages
		government website procurement plans, notices	32-33
		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."	
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Kenya	RCF	"We recognize the importance of safeguarding	Letter
		IMF and other financial assistance resources to	of
		ensure that such assistance is used for the very	Intent
		urgent purpose of resolving the current crisis.	
		With that in mind, we commit to post-crisis	Page 24
		auditing by our independent audit office of	5
		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 institutions and	
		our capacity to detect illicit enrichment and to	
		address conflict of interest in line with	
		international best practices and Fund advice."	
Kyrgyz	RFI/RCF	<i>First request</i> : "To ensure the quality of this additional	Letter of
Republic	-	spending in the health sector, we commit to subject	Intent
		the procurement of urgently needed medical	
		supplies to an ex-post audit by the Audit Chamber,	Page 25
		of which the results will be published on the website	Ū
		of the Ministry of Finance"	
		Additional commitments in the second request, which	Letter of
		apply also to spending financed by the first request:	Intent
		"To address the economic and health consequences	
		caused by the COVID-19 crisis, we are implementing	Pages
		the broad set of measures that we outlined in the	10-11
		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 state-	
		owned enterprises and joint stock companies with	
		state shares of more than 50 percent and their	

		autoridianiae an the Dublic Dragonary and the Mar	
		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."	
Lesotho	RFI &	The government is committed to enhance	Letter of
	RCF	governance and transparency in the use of public	<u>Intent</u>
		resources. In this regard , we are committed to (i)	
		publish quarterly reports on budget implementation,	Pages
		including specific budget lines accounting of	24-25
		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 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.	
Liberia	RCF	"Given the need for transparency and accountability	Letter of
		in the use of resources, we commit to having the	Intent
		General Audit Commission conduct a post-crisis	
		audit of all the crisis response spending within a year	Pages
		of the approval of the RCF disbursement. This action	39-40
		will not only ensure that the crisis spending is not	20.0
		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	

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		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."	
Madagaaaar	DCT	· · · ·	Lotter of
Madagascar (2 <sup>nd</sup> RCF)	RCF	" [] we reiterate our strong commitment to an	Letter of
		effective and transparent use of public funds, and to	<u>Intent</u>
		ensure that the aid received, including from the RCF	_
		disbursement, and the resources freed up by the	Pages
		DSSI, are efficiently spent on addressing the crisis.	27-28
		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) expost 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	

		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."	
Malawi	RCF	First request: "We will ensure that all government	Letter of
		spending to manage and contain the impact of the	Intent
		COVID-19 pandemic is transparent and efficient. In	
		line with our existing practices, we will regularly	Page 26
		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	
		<b>0</b>	
		well as in our budget funding and cash 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)."	
		Additional commitments in the second request, which	Latter of
		apply also to spending financed by the first request:	Letter of
		"While continuing to implement the measures	<u>Intent</u>
			<b>_</b>
		outlined in our April 27, 2020 Letter of Intent, we	Page 28

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 (https://www.ppda.mw/#). 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 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 guarterly 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

Maldives	RCF	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)."	Letter of
		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 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."	Intent Page 29
Mali	RCF	"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)."	Letter of Intent Page 25
Mauritania	RCF	"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 publish information on the ministry of finance's website regarding public	<u>Letter of</u> <u>Intent</u> Page 22

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		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."	
Moldova	RFI/RCF	"We are committed to implementing strong control,	Letter of
		audit, reporting, and transparency requirements	Intent
		with regards to crisis-related government spending,	
		including by publishing information on associated	Page 30
		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."	
Mongolia	RFI	"The government will continue to publish	Letter of
		information on revenue and expenditure	Intent
		performance on a regular basis. Especially, the	
		government will provide a separate reporting	Page 33
		mechanism for those Covid-19 expenditures	. age ee
		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 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."	
Montenegro	RFI	"To promote transparency and good governance,	Letter of
wontenegro		the State Audit Institution of Montenegro will audit	Intent
		crisis-mitigating spending (which will include ex-post	mem
		validation of delivery of goods and services) and	Pages
		publish the results online within 12 months of the	26-27
			20-21
		end of the fiscal year, in accordance with our laws.	
		We will also publish online all public procurement	

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		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."	
Mozambique	RCF	"We are committed to reforms to strengthen	Letter of
		governance, transparency and accountability in line	Intent
		with recommendations of the Government's	
		diagnostic report published in August 2019. Also, we	Pages
		will undertake an independent audit of crisis-	22-23
		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 crisis mitigation, the names of the awarded	
		companies, their beneficial owners, and ex-post	
		validation of delivery."	
Myonmor		"Regarding Anti Money Laundering and	Letter of
Myanmar	RCF/RFI		
		Combatting the Financing of Terrorism, we will	<u>Intent</u>
		continue to work with the Asia Pacific Group on the	D
		agreed time bound remedial Action Plan to remove	Pages 30-
		Myanmar from its enhanced monitoring list. [] In	31
		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	
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contract amount; and, (iv) reports of ex post	
validation of delivery related to (iii). The ADB will	
also assist us in publishing CERP progress reports."	
Additional commitments in the second request,	Letter of
which apply also to spending financed by the first	
<i>request:</i> "While continuing to implement the	<u>Intent</u>
measures outlined in our June 12 LOI, we reiterate	5
our strong commitment to ensuring that crisis	Pages
	31 - 33
resources are used transparently and effectively,	
including from the RCF/RFI disbursement and DSSI.	
We have made progress in this regard and will	
continue to strengthen public financial	
management as follows:	
• Fiscal accounts and budget monitoring. We have	
published on the MOPFI website the first	
quarterly budget monitoring report (FY2019/20	
Q3) identifying COVID-19 related spending with	
the agreed upon timeliness (3 months of the	
end of the quarter) along with consolidated GFS	
accounts. We will continue to work with the	
World Bank and Fund CD to improve the	
coverage of COVID-related spending and track-	
expenditures on a more timely basis through	
technological solutions and adopt a new chart of	
accounts in FY2021/22.	
Strengthening procurement transparency. We	
have published on the MOPFI website	
information on procurement contracts on	
COVID-19 related spending above MMK 100	
million, including the names of the awarded	
companies and their beneficial owners, the	
specific nature of the goods and services	
procured, their price per unit where available	
and overall contract amount along with the ex	
post delivery reports.	
Enhancing auditing. We have reached an	
agreement with the Office of the Auditor	
General for Myanmar (OAGM) to conduct a	

Namihia	DE1	financial audit of COVID-19 related spending and are on track to disseminate a report within 6 months of the end of the fiscal year by March 2021. The Office of the Auditor General is benefiting from CD from ADB, WB and Norway, and will also undertake risk-based audits of broader spending from FY2020/21. The external audit will be assisted by existing internal audit teams monitoring such expenditure through the implementation of the draft Internal Audit Manual with Fund CD. [] 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."	Lotter of
Namibia	RFI	"In line with our public finance governance mechanisms, we will ensure the appropriate use, monitoring and reporting of COVID-19 related spending. All COVID-19 spending was appropriately budgeted, and we have presented a progress report on the execution of COVID-19 spending as of end-October 2020 in the FY20/21 mid-year budget review. Furthermore, we will publish a further progress report on the execution of COVID-19 spending in the FY21/22 budget and a final execution report of COVID-19-related spending on the website of the Ministry of Finance by the beginning of September 2021. We will also publish online, on the website of the Ministry of Finance, all awarded COVID-19 related procurement contracts, including the names of awarded entities and their beneficial owners, in accordance with Namibia's Financial Intelligence Act of 2012. Furthermore, the Auditor General will conduct an independent audit of COVID-19 spending, including ex-post validation of goods and services procured, as a part of our annual auditing of budgetary spending, within 12 months of the end of	Letter of Intent Page 38

		FY20/21. We will further strengthen our public	
		financial management system by finalizing the draft	
		Public Financial Management bill by end-2021	
		and adopting it by end-2022."	
Nonal	RCF		Letter of
Nepal	KCF	"We recognize the importance of good governance,	Letter of
		transparency and accountability, and tackling	Intent
		corruption and related money laundering. We	_
		commit to ensure that the funds provided by the	Pages
		IMF will be effectively used to safeguard public	22-23
		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 frameworks. The allocation details will be	
		made public on the Ministry of Finance website."	
Nicaragua	RCF/RFI	"We are committed to follow the highest standards	Letter of
_		for fiscal transparency, to mitigate any risks related	<u>Intent</u>
		to governance and corruption vulnerabilities, and to	
		ensure that emergency spending reaches the	Page 46
		intended population. We have already enacted	U
		regulations that enable the online publication of	
		beneficial owner(s) of all public procurement	
		contracts (prior action, Table 1). The publication of	
		contracts (under bidding and tender processes),	
		which began October 15, 2020, contains contract	
		amounts, the specific nature of the goods or	

services procured and their price per unit (where
applicable), the names of the awarded entities and
their beneficial owner(s), and the names of the
public officials awarding the contracts (see website
www.gestion.nicaraguacompra.gob.ni/siscae/portal).
We recognize the importance of ensuring that
emergency spending is properly accounted for
and began publishing all COVID-19 related
contracts signed since June 2020 (see website
http://www.nicaraguacompra.gob.ni/contratos-
covid-19/Contratos%20Covid%2019). In addition,
we have consulted with IMF staff the terms of
reference for an external, independent firm to
audit all COVID-19 related expenditures, including
funds channeled through the UNOPS and the WFP
(prior action, Table 1).
To enhance fiscal transparency, we began to publish
the financial statements of the five largest
state-owned enterprises—namely ENATREL, ENEL,
PETRONIC, EPN, and ENACAL— covering the period
2015–19. We are determined to gradually expand
the annual reporting of financial statements to all
state-owned enterprises, including audit reports
from the Comptroller General (prior action, Table 1).
To achieve the highest standards of fiscal
transparency and accountability we have requested
IMF technical assistance to conduct a fiscal
transparency assessment exercise. In addition, we
are taking the necessary steps to ensure that the
use of emergency financing remains transparent
and accountable. In particular, we will: (1) hire, in
line with the agreed terms of reference, an external,
independent firm to audit all COVID-19 related
expenditures through July 2021 and to publish the
results of such audit on the government's website
within two weeks of its finalization; (2) adhere to
best practices in procuring and awarding contracts;
(3) facilitate the tracking and reporting of the use of
resources by channeling externally sourced
emergency assistance through a dedicated

		subscoupt of the transum single account	
		subaccount of the treasury single account.	
		We renew our commitment to implement swift	
		reforms to enhance governance and combat	
		corruption in line with the latest Article IV	
		recommendations. We plan to strengthen the	
		effectiveness of our anti-money	
		laundering/combating the financing of terrorism	
		framework in accordance with the action plan	
		already agreed with the Financial Action Task	
		Force."	
Niger	RCF	"The government will refrain from crisis measures	Letter of
-		that would permanently damage the revenue base,	Intent
		maintain fiscal transparency by enshrining fiscal	
		crisis measures in a supplementary budget,	Page 37
		centralize the costing and the keeping count of	. ege er
		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."	
Nigeria	RFI	"Our anti-corruption efforts will continue unabated.	<u>Letter of</u>
		We will strengthen the role of the Federal Audit	<u>Intent</u>
		Board in combating corruption and are committed	
		to strengthening the asset-declaration framework	Page 33
			- 5
		and fully implementing the risk-based approach to	- 5
		and fully implementing the risk-based approach to AML/CFT supervision while ensuring the	
		AML/CFT supervision while ensuring the	
		AML/CFT supervision while ensuring the transparency of beneficial ownership of legal persons. We fully recognize the importance of	
		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	
		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	
		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	
		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 and	
		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 and report funds released and expenditures incurred	
		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 and report funds released and expenditures incurred monthly on the transparency portal	
		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 and report funds released and expenditures incurred monthly on the transparency portal (http://opentreasury.gov.ng/); (ii) publish	
		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 and report funds released and expenditures incurred monthly on the transparency portal (http://opentreasury.gov.ng/); (ii) publish procurement plans, procurement notices for all the	
		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 and report funds released and expenditures incurred monthly on the transparency portal (http://opentreasury.gov.ng/); (ii) publish	

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		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."	
Pakistan	RFI	"To ensure the quality of the additional spending in	Letter of
		the health sector, we commit to subject the	Intent
		procurement of urgently needed medical supplies to	
		an ex-post audit by the Auditor General of Pakistan,	Page 30
		the results of which will be published on the website	5
		of the Ministry of Finance. [] We will continue to	
		strengthen governance by enhancing the	
		effectiveness of anti-corruption and AML/CFT	
		frameworks."	
Papua New	RCF	"Under recently implemented emergency COVID-19	Letter of
Guinea		directions, the government's State of Emergency	Intent
		Controller posts details of all procurements awarded	<u></u>
		on the government procurement website	Page 24
		(http://www.procurement.gov.pg/) within a week of	Tuge 24
		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	

Paraguay	RFI	spending within a year of the end of the emergency." "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 governance."	<u>Letter of</u> Intent Page 25
Rwanda (2 <sup>nd</sup> RCF)	RCF	"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: http://umucyo.gov.rw/index.do] 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."	Letter of Intent Page 22
Samoa	RCF	"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."	<u>Letter of</u> <u>Intent</u> Page 29

Sao Tome	RCF	"We will ensure proper monitoring of all expenditure	Letter of
and Principe		relating to the pandemic and improve transparency	Intent
		in public procurement. The government will ensure	
		adequate control of total pandemic-related	Page 17
		expenses and adopt measures by end-April 2020 to	5
		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."	
Senegal	RCF/RFI	"The government is committed to ensure	Program
5		transparency and accountability in emergency	Statement
		expenditures as follows: (i) publishing all related	(PCI 1 <sup>st</sup>
		tenders and clarifying procurement procedures; (ii)	review
		publishing the list of successful bidders on	that
		government contracts; (iii) establishing expenditure	occurred
		controls; (iv) ensure that the execution of	not long
		expenditure related to COVID-19 is officially	after the
		accounted for through quarterly budget execution	RCF was
		reports; (v) through the annual audit of government	
		contracts, verify the regularity of procurement	approved)
		procedures applicable to COVID-19-related	Page 49
		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."	
L	1		

Seychelles	RFI	"We are [] committed to ensure transparency of	Letter of
Seychenes		the COVID-19 related emergency fiscal spending	Intent
		and will submit monthly reports of the emergency	interit
		spending on wage subsidies, health, and social	Page 29
		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."	
Sierra Leone	RCF	"In addition to ongoing reforms to strengthen our	Letter of
		AML/CFT and anti- corruption frameworks, we will	<u>Intent</u>
		be putting in place strong and targeted measures.	
		More precisely, we are introducing mechanisms for	Page 27
		regular monitoring and reporting on the use of	
		funds. Our Anti-Corruption 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."	
		Additional commitments in the second request, which	<u>Letter of</u>

		apply also to spending financed by the first request:	Intent
		"In line with our Government's flagship agenda to	
		eradicate corruption and strengthen governance,	Page 38
		we are making concerted efforts to report on our	J
		emergency response, extend reporting to our	
		overall response, and address known vulnerabilities.	
		For instance: [] On February 25, we published key	
		details of all large procurement contracts relating to	
		crisis mitigation awarded as of December 31, 2020,	
		including information on the names of companies	
		awarded contracts and their beneficial ownership, on	
		the National Public Procurement Authority's (NPPA)	
		website (prior action). We commit to publishing this	
		information on a monthly basis going forward. In the	
		absence of a procurement contract in a particular	
		month, we will note "no new contracts as of	
		[month]" on the NPPA's website. We welcome the	
		Audit Service Sierra Leone's real-time audit of our	
		emergency response, its discussion report in	
		Parliament, and its online publication in December	
		2020. This report will be scrutinized by Parliament's	
		Public Accounts Committee, which will recommend	
		further steps if necessary. We will take actions to	
		sanction the irregularities and address the	
		weaknesses in procurement, HR and fiduciary	
		management identified by the audit exercise. We will	
		also provide documentary evidence as requested.	
		We will later facilitate the ASSL final audit of the	
		COVID-19 response and the publication of its report	
		within 12 months of the end of the fiscal year, as	
		required under the Constitution."	
Solomon	RCF/RFI	"We recognize the importance of good governance,	Letter of
Islands <sup>2</sup>		transparency and accountability, and tackling	<u>Intent</u>
		corruption and related money laundering. We	
		commit to ensure that the funds provided by the	Page 20
		IMF will be effectively used to maintain	
		macroeconomic stability, thus safeguarding public	

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

		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."	
South	RFI	"On governance, meaningful reforms are being	Letter of
Africa		implemented in the South African Revenue Service,	Intent
		the Public Investment Corporation, and other	
		institutions. New leadership has been appointed in	Pages
		various public entities; policies and procedures are	44-45
		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 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)."	

Sudanresources to support essential pandemic-related spending. We will ensure that all such transactions are recorded in the Integrated Financial Management Information System (IFMIS). We will publish all pandemic-related documentation, along with the names of awarded companies and their beneficial ownership information within three months after contract signing, and publish the ex-post validation of delivery of the contracts within one year after the contract signing. We will publish reports on pandemic-related spending on a monthly basis. In addition, the Auditor General will conduct and publish an audit of all spending from this account on a quarterly basis. All the information on the beneficial owners of including information on the beneficial owners of the kinistry of Finance and Planning as soon as they are completed."Letter of IntentSt. Vincent & the GrenadinesRCF"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."Letter of IntentAdditional commitments in the second request, which apply also to spending financed by the first request: "We are also committed to report monthly on COVID-related expenditures and undertake a full ex- post financial and operational audit."Letter of IntentTajikistanRCF"The Government is committed to enhancing governance and ensuring transparency and accountability in this process. We will ensure anyLetter of Intent	South	RCF	"We are committed to transparency in the use of these	Letter of
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Post financial and operational audit of COVID-19 spending at the time of the annual audit." Letter of   Tajikistan RCF "The Government is committed to enhancing governance and ensuring transparency and accountability in this process. We will ensure any Letter of				Page 51
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Tajikistan RCF "The Government is committed to enhancing governance and ensuring transparency and accountability in this process. We will ensure any Letter of Intent				
governance and ensuring transparency andIntentaccountability in this process. We will ensure any	Tajikistan	RCF		Letter of
accountability in this process. We will ensure any			5	
			funds provided for addressing the impacts of	Page 21
COVID-19 will be put to best possible use. We have				5
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 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."	
Tonga	RCF	"[] We are finalizing the public financial action plan, and strengthening procurement, cash management and internal audit processes to improve the monitoring of public service delivery. Given the increased spending on health, we are committed to producing financial reports on health spending and outcome. [] Given the importance of remittances for the economy and the financial system, we are strengthening the legal compliance and effectiveness of our AML/CFT framework as a matter of priority to address possible concerns raised by the ongoing draft mutual evaluation by the Asia Pacific Group, in particular, to amend the legal framework to establish risk-based supervision, and strengthen regulations and enforcement through increased awareness of AML/CFT risks by reporting entities, provision of adequate financial and human resources to the AML/CFT supervisor, and implementation of appropriate measures in relation to beneficial ownership and politically exposed persons, if possible prior to the final adoption of the report. We recognize the importance of good governance, transparency and accountability. We are committed to ensuring that the funds provided by the IMF will be	Letter of Intent Pages 61 – 62

		effectively used to safeguard public health, reduce poverty, and support the economic recovery. Toward that end, we will publish on the government's website (i) an audit of COVID-19 related expenditures by the Audit Department within 9-12 months and (ii) pandemic-related public procurement contracts and related documents, including owners of awarded companies. We will make every effort to identify beneficial owners of awarded companies. In line with the IMF's safeguards policy, we commit to undertaking a safeguards assessment of the NRBT, in collaboration with IMF staff, providing IMF staff with NRBT's most recently completed external audit reports, coordinating meetings of IMF staff with the staff in charge of these issues in the NRBT and authorizing IMF staff to hold discussions with NRBT's external auditors."	
Tunisia	RFI	"[] 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."	<u>Letter of</u> <u>Intent</u> Page 38
Uganda	RCF	"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 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	Letter of Intent Pages 26-27

-		include an ex-post validation of delivery of the large	
		procurement contracts, and publishing the results."	
Uzbekistan	RFI/RCF	"As part of Uzbekistan's five priorities for	Letter of
		development, we aim to improve governance and	Intent
		public management. The government is also	
		committed to combating corruption and improving	Page 26
		the efficiency of its anti-corruption efforts, including	- 9
		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 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 (www.mf.uz); (iii)	
		publish on the Ministry of Finance website (www.ini.uz), (iii)	
		(www.mf.uz) 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."	