Secretariat

Integrity and Accountability: Saudi Arabia's Anti-Corruption Drive

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Introduction

Saudi Arabia's Vision 2030, a blueprint for economic transformation and long-term prosperity, strongly emphasises accountability and combating corruption. Nazaha, the authority tasked with leading the fight against corruption in Saudi Arabia, reported the arrest of more than 1,700 individuals on corruption charges in 2024, underscoring the seriousness with which Saudi Arabia is pursuing its anti-corruption agenda.

The introduction of the Nazaha Law in 2024 marked a significant milestone in these efforts. The law enhances transparency, accountability, and public participation in combating corruption. Key areas of progress include strengthened governance frameworks, expanded corporate liability, and improved whistleblower protections. This focus on accountability is essential to foster a more transparent and fair business environment, attract crucial foreign investment, and ensure the efficient allocation of public resources — all vital components of Vision 2030.

For all these components to work, the Kingdom will need to overcome several key challenges, namely improving public and investor perceptions of corruption, fostering a pervasive culture of accountability to reduce the number of corruption cases ultimately, and ensuring that the private sector actively participates by strengthening compliance and ethical practices.

This whitepaper outlines the connection between Saudi Arabia's anti-corruption efforts and Vision 2030, detailing the role and activities of Nazaha (including statistics on Nazaha caseloads, reporting channels, and providing examples of high-profile cases) and the Kingdom's legal framework for combating corruption, focusing on the Nazaha Law of 2024 and the Anti-Bribery Law amendments of 2021. Finally, we look ahead to future progress and remaining challenges.

2024 Corruption Cases: *Nazaha investigated multiple criminal and administrative cases, arresting 1,708 individuals on corruption charges — a significant increase from prior years.*

2020-2023 Corruption Trends: *25,633 cases were reported over this period, with bribery and abuse of influence as leading offences, followed by embezzlement, money laundering, forgery, and misuse of public funds.*

Reporting Growth: *Reports rose from 6,482 in 2016 to 47,167 in 2023, leveraging channels like phone, email, in-person visits, apps, and messenger services.*

High-Risk Sectors: *Sectors with most cases are the Interior, Health, Education, and Municipalities & Housing.*
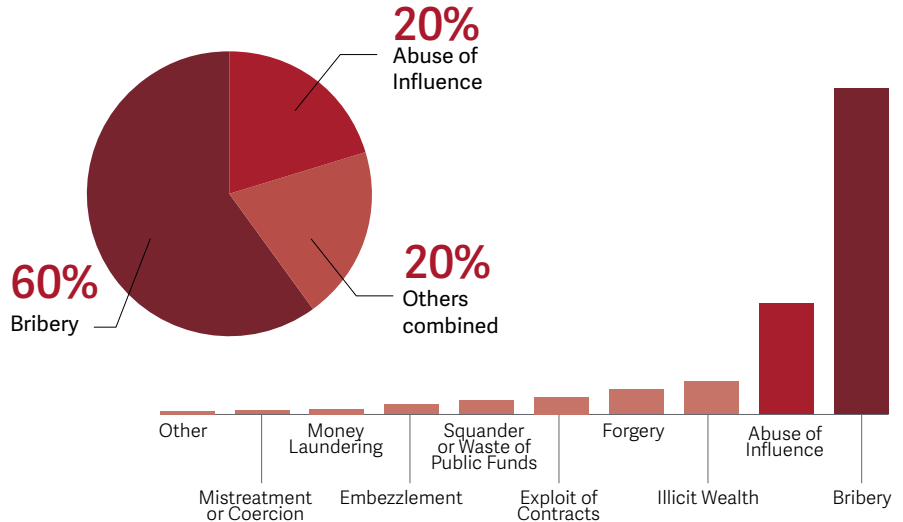
Nazaha Law (2024): *Enhanced governance and accountability through expanded powers, such as reverse burden of proof, settlement enforcement, and updated anti-corruption measures.*
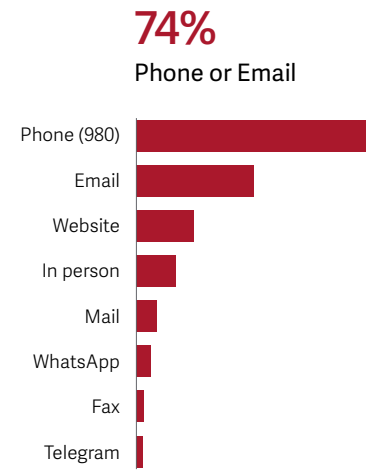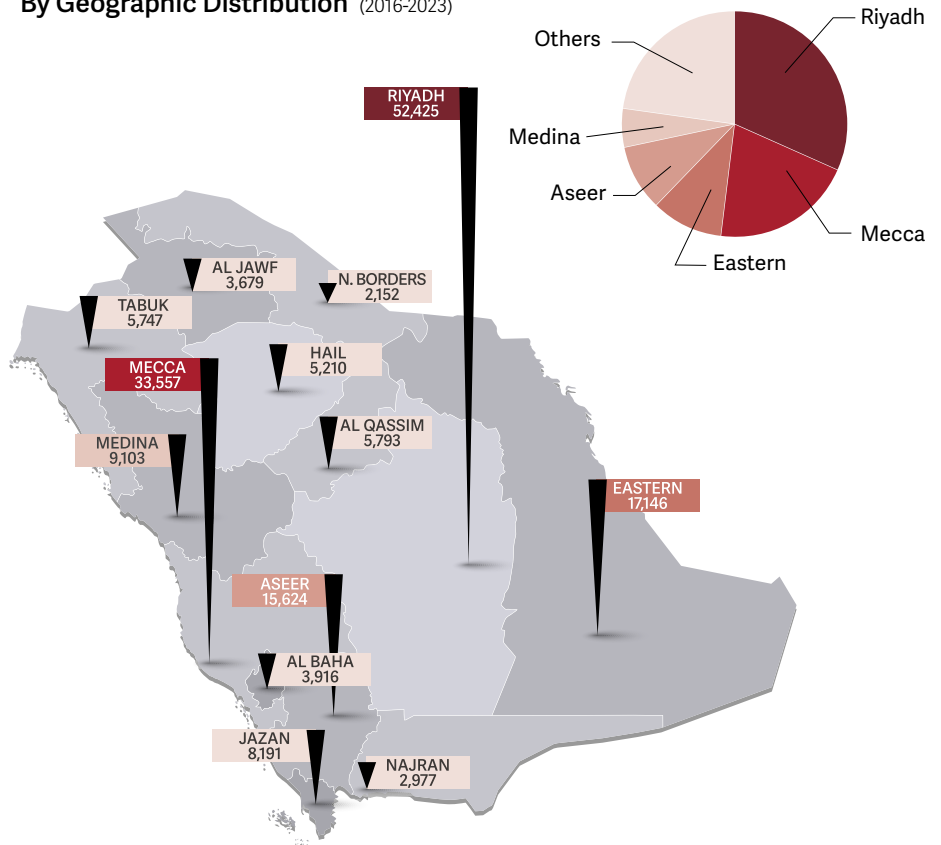
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Infographic of Nazaha Statistics
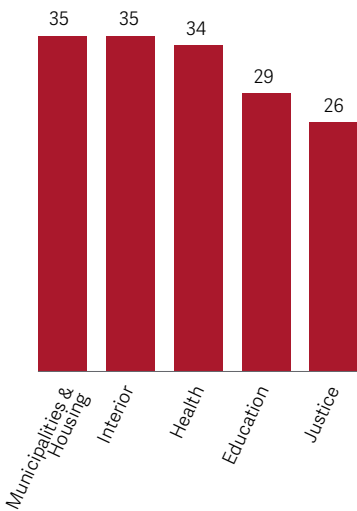
By Type of Offence (2020-2023)

20% Abuse of Influence

20% Others combined

60% Bribery

Bar chart categories (left to right):
Other · Mistreatment or Coercion · Money Laundering · Embezzlement · Squander or Waste of Public Funds · Exploit of Contracts · Forgery · Illicit Wealth · Abuse of Influence · Bribery

By Reporting Channel (2020-2023)

74% Phone or Email

- Phone (980)
- Email
- Website
- In person
- Mail
- WhatsApp
- Fax
- Telegram

By Sector (2022-2024)

Number of months sectors named in Nazaha updates:

Municipalities & Housing	Interior	Health	Education	Justice
35	35	34	29	26

By Geographic Distribution (2016-2023)

Pie chart: Others · Medina · Aseer · Eastern · Mecca · Riyadh

Map labels:
- RIYADH 52,425
- N. BORDERS 2,152
- AL JAWF 3,679
- TABUK 5,747
- HAIL 5,210
- MECCA 33,557
- AL QASSIM 5,793
- MEDINA 9,103
- EASTERN 17,146
- ASEER 15,624
- AL BAHA 3,916
- JAZAN 8,191
- NAJRAN 2,977

Visits/Investigations/Arrests (2022-2024)

Oversight Visits

2022	2023	2024
44,871	28,933	28,430

Investigations

2022	2023	2024
3,308	3,124	4,000

Arrests

2022	2023	2024
1,255	1,511	1,708

Data Source: www.nazaha.gov.sa

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The Oversight and Anti-Corruption Authority (Nazaha)

Nazaha (meaning 'integrity' in Arabic) is the independent body tasked with leading the fight against corruption in Saudi Arabia. Established in 2011, it plays a critical role in supporting Vision 2030 by:

Handling complaints by providing a safe, confidential, and transparent mechanism for individuals to report corruption and ensure their concerns are addressed.

Combating corruption by actively investigating financial and administrative corruption allegations, taking appropriate action against any misconduct identified.

Raising public awareness by educating the public about the consequences of corruption and its impact on society.

Providing administrative oversight by overseeing public entities and safeguarding government operations.

Driving international cooperation by collaborating with international organisations to align Saudi Arabia's anti-corruption standards with global best practices.

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Anti-Corruption Legislation

Anti-Bribery Law

The primary legal framework for combating corruption is the Anti-Bribery Law, initially issued by Royal Decree No. M/36 on 30 June 1992.[1,2] There have been several amendments to the 1992 decree, the most recent in 2021. The 2021 amendment was significant because it aimed at strengthening the country's anti-corruption framework to further support Vision 2030. Some of the key updates included:

- Broadened scope to include the private sector: The term 'any public servant' under Article 5 was replaced with 'any person'. This meant the expansion to include persons outside of public positions in the private sector.

- Focus on foreign officials: Article 8 (Clause 7) was updated to include provisions for 'foreign public servants', extending the law's reach to bribes involving international officials and organisations.

- Corporate liability: Article 9 was amended to establish corporate liability. Corporations can now be held accountable if their employees commit bribery for the company's benefit.

Enhanced asset recovery: Article 15 was amended to include not only the bribe or benefit involved in the crime but also its equivalent value when confiscation is not possible, as well as any proceeds generated from those assets. This change enhances the government's ability to recover illicit assets more effectively.

The Nazaha Law

Alongside the Anti-Bribery Law, the new Nazaha Law took effect in November 2024. The law significantly expands the authority's powers and signals a move towards greater transparency and accountability across the public and private sectors. Key provisions include:

- Broader Definition of Corruption: The law expands the definition of corruption to encompass a wider range of offences, such as misuse of public funds and abuse of power.

- Expanded Investigative Powers: Nazaha can now establish specialised units reporting directly to the highest levels of government, allowing for more targeted and efficient investigations.

- Reverse Burden of Proof: For public officials whose wealth appears disproportionate to their declared income, the onus is now on them to explain the discrepancy. This strengthens efforts to deter corruption.

- Enhanced Whistleblower Protection: The Nazaha Law strengthens legal safeguards for whistleblowers, encouraging them to report corruption without fear of reprisal. This is critical for uncovering wrongdoing and holding individuals accountable.

- Settlement Process: The new law introduces a framework for accused individuals to settle corruption cases, potentially avoiding lengthy legal proceedings while ensuring accountability.

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A Closer Look at Nazaha's Recent Activities

Based on data published by Nazaha, the authority has seen significant growth in caseload in recent years (for a more detailed analysis, refer to pages 9–13):

- In 2024, Nazaha brought several criminal and administrative cases, leading to investigations involving officials from various government departments and the arrest of 1,708 individuals on corruption charges. The number of arrests has grown from previous years and shows the determination to hold individuals accountable.

- Between 2020 and 2023, Nazaha reported 25,633 corruption cases, with bribery and abuse of influence being the most significant types of offence. Embezzlement, money laundering, and forgery also represented substantial issues, while categories like mistreatment, squandering public funds, and exploitation of contracts further contributed to the overall caseload.

- Nazaha maintains numerous reporting channels; from 2016 to 2023, there was considerable growth in the reporting of allegations (from 6,482 in 2016 to 47,167 in 2023). The most prominent reporting channels are phone, email, and in-person reporting, followed by newer digital platforms like Nazaha's app and social messenger services.

- Government departments such as Interior, Health, Education, and Municipalities & Housing show the most frequent corruption cases, which Nazaha closely monitors.

- On 7 November 2024, the Nazaha Law took effect, marking the next step in Saudi Arabia's efforts to improve governance, accountability, and transparency. The law substantially enhances Nazaha's powers to investigate, prosecute, and prevent corruption in Saudi Arabia. Some of these powers include reporting directly to HRH King Salman and HRH Crown Prince Mohammed bin Salman, applying a 'reverse burden of proof' for unexplained wealth, enforcing a settlement process, and proposing and updating preventative anti-corruption measures.

- Also in November 2024, Nazaha and SAMA entered into an agreement to bolster cooperation between the two organisations. The collaboration leverages SAMA's role in overseeing financial institutions and Nazaha's mandate to combat financial and administrative corruption. It aims to ensure seamless integration of their roles, safeguard the stability of the financial sector, and boost public and investor confidence.

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Notable Examples of Corruption Cases

Medical Procedure Fraud

— *from publication 28 December 2022*

Two doctors were arrested for fraudulently billing hospitals SAR 87,336,296 by claiming they personally performed 18,953 surgeries. These consultants hired unauthorised doctors to carry out the operations, then demanded payment as if they themselves had conducted the procedures.

Source: https://gulfnews.com/world/gulf/saudi/saudi-arabia-two-doctors-held-over-absentee-surgeries-1.92946922

Notary Land Deed Fraud

— *from publication 8 November 2023*

A notary public was arrested for illegally issuing land deeds and registering them under relatives' names. His brother then sold these fraudulently obtained properties for a total of SAR 65,000,000. The scheme involved manipulating official property records and abusing the notary's position of trust.

Source: https://www.zawya.com/en/legal/crime-and-security/saudi-nazaha-arrests-several-persons-over-corruption-s3k86ip4

493 Million SR Bank Financing Fraud

— *from publication 7 November 2024*

A citizen and a bank employee were arrested for securing SAR 493,000,000 in financing through fake property deeds and forged investment contracts. Of this amount, SAR 100,000,000 was transferred abroad to purchase property, hiding the assets under relatives' names. Additional arrests included General Directorate of Passports personnel who accepted money to facilitate the suspect's unlawful entry and exit from the Kingdom.

Source: https://nazaha.gov.sa/News/Details?q=IVJvUv8hIh8TEdbkHmhYCQ==

Royal Commission for AlUla CEO Corruption

— *from publication 29 January 2024*

The CEO of the Royal Commission for AlUla and his associates were arrested for abuse of authority and money laundering. Before entering the government sector, he illegally secured SAR 206,630,905 worth of contracts for National Talents Company, which he co-owned. After joining the government, he continued to direct projects totalling SAR 1,298,923 to the same company. Profits were then funnelled back to him through relatives and co-conspirators.

Source: https://www.arabnews.com/node/2449851/saudi-arabia

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Data on Nazaha's Reported Activities 2020-2024

By Geographic Distribution

The geographical distribution of corruption reports allows Nazaha to evaluate where resources are being utilised efficiently and where additional focus is required. Through targeted interventions in underreported regions, Nazaha can work towards a more equitable and transparent system across the country.

Riyadh, the main urban conglomeration and centre of government, remains the region with the highest number of reports, consistently accounting for a significant proportion (32%) of the total (52,425 reports by 2023). This is expected given Riyadh's status as the Kingdom's capital and administrative centre.

Mecca and **Eastern** regions also show high levels of reports, with a steady increase in the number of reports year-on-year, reaching 33,557 and 17,146 reports, respectively, by 2023.

Aseer, **Medina**, and **Jazan** have witnessed steady growth in the number of reports, indicating broadening coverage and increasing awareness in these areas.

Northern Borders, **Al Jawf**, and **Najran** are the regions with the fewest reports. These regions represent areas where targeted interventions could be made to ensure better reporting mechanisms and resources.

	2016	2017	2018	2019	2020	2021	2022	2023	Sum
Riyadh	1,073	1,093	2,944	4,319	6,542	8,202	13,787	14,465	**52,425**
Mecca	711	726	1,843	2,442	3,770	5,205	8,735	10,125	**33,557**
Eastern	417	384	828	1,569	1,770	2,643	4,363	5,172	**17,146**
Aseer	432	493	1,174	1,283	1,877	2,401	4,049	3,915	**15,624**
Medina	225	166	508	728	998	1,477	2,236	2,765	**9,103**
Jazan	240	196	539	581	1,007	1,087	2,562	1,979	**8,191**
Tabuk	120	95	260	433	660	817	1,484	1,878	**5,747**
Alqassim	148	119	246	442	703	985	1,470	1,680	**5,793**
Hail	129	147	372	505	552	802	1,285	1,418	**5,210**
Al Jawf	79	64	142	284	458	550	930	1,172	**3,679**
Al Baha	102	85	204	253	573	693	917	1,089	**3,916**
Najran	86	36	138	224	367	458	848	820	**2,977**
Northern Borders	40	32	108	139	224	404	516	689	**2,152**
Sum	**3,802**	**3,636**	**9,306**	**13,202**	**19,501**	**25,724**	**43,182**	**47,167**	**165,520**

Source: https://www.nazaha.gov.sa/PageDetails/?q=jC1GK1E8G177v///ptw2Lw==

By Type of Offence

From 2020 to 2023, data from Nazaha reveals that **bribery** consistently represented the largest category of crime, accounting for an average of 50%-60% of total corruption reports. The second most prevalent category, **abuse of influence**, averaged around 20% of the total reports during the same period.

Other crime types, such as **embezzlement**, **money laundering**, and **illicit wealth**, make up a smaller share but still reflect significant corruption issues.

These trends underline the dominance of bribery and abuse of influence as the primary corruption offences in Saudi Arabia during this period. Understanding these patterns is crucial for refining anti-corruption efforts and enhancing the effectiveness of enforcement strategies.

Type of Offence	2020	2021	2022	2023*	Sum
Bribery	4,291	3,175	2,646	5,170	15,282
Abuse of influence***	1,350	1,316	658	1,872	5,196
Illicit wealth	165	468	269	624	1,526
Exploit of contracts	130	262	153	267	812
Forgery	508	229	162	267	1,166
Squander or Waste of public funds**	188	193	94	178	653
Mistreatment or coercion	17	24	31	89	161
Money laundering	25	56	72	89	242
Embezzlement	120	131	101	89	441
Other	35	118			153
Sum	**6,829**	**5,972**	**4,186**	**8,646**	**25,633**

Type of Offence by Percentage	2020	2021	2022	2023*	Sum
Bribery	63%	53%	63%	60%	60%
Abuse of influence***	20%	22%	16%	22%	20%
Illicit wealth	2%	8%	6%	7%	6%
Forgery	7%	4%	4%	3%	5%
Squander or Waste of public funds**	3%	3%	2%	2%	3%
Exploit of contracts	2%	4%	4%	3%	3%
Embezzlement	2%	2%	2%	1%	2%
Other	1%	2%	0%	0%	1%
Mistreatment or coercion	0%	0%	1%	1%	1%
Money laundering	0%	1%	2%	1%	1%
Sum	**100%**	**100%**	**100%**	**100%**	**100%**

*__*2023__ — This figure is estimated using the percentage breakdown of crimes presented in the 2023 Nazaha report. The total number of categorised cases (8,646) was not provided and was calculated by applying the 2016–2022 average proportion of categorised cases to the overall number of cases under the authority's jurisdiction.*

*__**Squander or Waste of Public Funds__ — This category unifies 'Squander of public funds', 'Waste of public funds' reported as two separate categories in 2021-2023 and 'Squander or Waste of public funds' reported as a single category in 2020.*

*__***Abuse of Influence__ — This category unifies 'Abuse of influence', 'Administrative abuse', and 'Abuse of power' reported from 2020 to 2023 under different categories.*

Source: https://www.nazaha.gov.sa/PageDetails/?q=jC1GK1E8G177v///ptw2Lw==

By Reporting Channel

The availability of diverse reporting channels plays a critical role in enhancing accessibility and encouraging the public to report corruption. By offering multiple channels, such as phone hotlines, emails, websites, and in-person reporting, Nazaha ensures that individuals from various backgrounds and technological capabilities can easily come forward with information. In addition, using secure platforms like the Nazaha website or app helps protect the confidentiality of whistleblowers, further promoting transparency and accountability.

Since 2020, **Nazaha's phone hotline (980)** and **email** have been the most widely used reporting channels, accounting for more than 74% of the total reports in 2023. Other channels, such as the **website**, **in-person reporting**, and **WhatsApp**, also play important roles in facilitating corruption reporting.

Reporting Channel	2016	2017	2018	2019	2020	2021	2022	2023	Sum
Phone (980)*	-	-	-	-	17,019	34,361	21,320	17,757	90,457
Email*	-	-	-	-	5,723	14,695	8,643	17,389	46,450
Website	1,851	3,900	4,545	6,220	4,456	7,000	2,546	1,891	32,409
In person	1,077	2,054	3,092	3,025	2,472	6,389	6,852	6,940	31,901
Nazaha's App	-	2,326	5,537	8,395	-	-	-	-	16,258
Mail	380	964	1,770	1,478	1,616	2,702	2,289	1,878	13,077
WhatsApp	-	-	-	-	5,976	-	-	-	5,976
Fax	440	682	731	776	685	1,233	713	355	5,615
Telegram	162	249	316	391	597	1,066	819	957	4,557
Investigation	1,389	227	-	-	-	-	-	-	1,616
Other	1,183	-	-	-	-	-	-	-	1,183
Sum	**6,482**	**10,402**	**15,991**	**20,285**	**38,544**	**67,446**	**43,182**	**47,167**	**249,499**

Data for Phone and Email is not available for the period 2016 – 2019.

Source: https://www.nazaha.gov.sa/PageDetails/?q=jC1GK1E8G177v///ptw2Lw==

By Sector

High-frequency sectors: The **Interior, Health, Education**, and **Municipalities & Housing** sectors consistently show up as the primary areas for corruption reports over the past three years. These sectors represent areas where both public service operations and public-facing interactions are frequent, and may be more vulnerable to misconduct due to their large scope and complex operations.

Defence and National Guard: While **Defence** and **National Guard** sectors have shown relatively high cases, the volume dropped in 2024. These sectors typically involve high levels of security, which could be prone to certain types of corruption, such as procurement fraud or resource mismanagement.

Emerging sectors: Zakat, Tax & Customs saw an increase in reports in 2023, suggesting increased vigilance or possible new sources of corruption. Similarly, **Environment, Water & Agriculture**, and **Transport & Logistics Services** sectors reported cases.

	2022	2023	2024	Sum
Interior	11	12	12	35
Municipalities & Housing	12	12	11	35
Health	12	12	10	34
Education	9	11	9	29
Justice	9	9	8	26
Defence	9	11	4	24
National Guard	4	6	6	16
Zakat, Tax & Customs	1	8	5	14
Environment, Water & Agriculture	0	2	2	4
Human Resources & Social Development	1	1	2	4
Foreign Affairs	1	2	0	3
Transport & Logistic Services	2	0	1	3
Commerce	1	0	1	2
Energy	0	1	0	1
Culture	0	0	1	1
General Authority for Statistics	0	0	1	1
General Authority of Civil Aviation	1	0	0	1
Oversight & Anti-Corruption Authority	0	1	0	1
Islamic Affairs	0	1	0	1
Dawah & Guidance	0	1	0	1

Source: https://x.com/nazaha_en and https://www.nazaha.gov.sa/News

Visits/Investigations/Arrests 2022-2024

By providing transparent statistics on oversight visits, investigations, and arrests, Nazaha reinforces its commitment to addressing corruption and promoting accountability within government operations. Publicly available data plays a critical role in educating the public, building trust, and encouraging the reporting of misconduct. These figures, shared monthly on Nazaha's website and X account, illustrate the scale of action being taken against corruption.

Oversight Visits: The number of oversight visits initiated by Nazaha has gradually decreased from **44,871** in 2022 to **28,430** in 2024. Despite this decline, Nazaha's oversight activities have been robust, with a total of **102,234** visits over this three-year period, reflecting an ongoing commitment to monitoring and inspecting government operations.

Investigations: Investigations have remained consistent, with a slight increase in 2024 to **4,000**, up from **3,308** in 2022. Overall, **10,432** investigations were initiated across the three years, indicating a stable effort to probe allegations of corruption and other misconduct.

Arrests: The number of arrests rose from **1,255** in 2022 to **1,708** in 2024. This uptick suggests more effective enforcement and legal actions taken following investigations, resulting in more individuals being held accountable for corrupt activities.

	2022	2023	2024	Sum
Oversight visits initiated	44,871	28,933	28,430	**102,234**
Investigations Conducted	3,308	3,124	4,000	**10,432**
Arrests Made	1,255	1,511	1,708	**4,474**

Source: https://x.com/nazaha_en and https://www.nazaha.gov.sa/News

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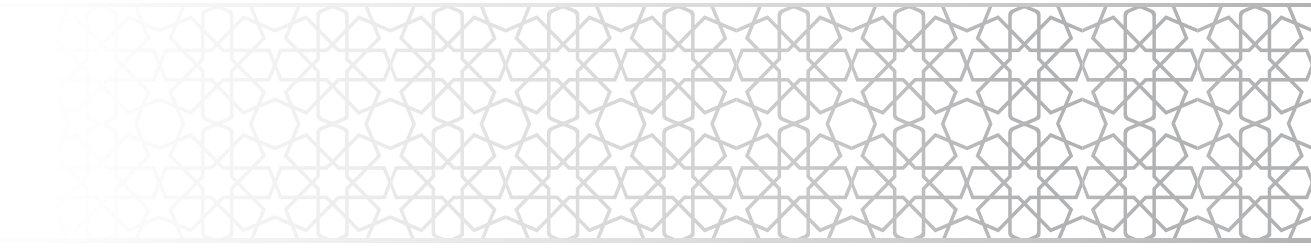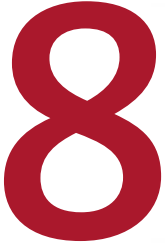
Outlook for 2025 and Beyond

As Saudi Arabia continues its Vision 2030 reforms, its anti-corruption efforts are expected to see significant progress in 2025. Here are some key areas to watch:

- Enhanced Transparency and Accountability: The Nazaha Law signals a new era of stricter enforcement for public and private sectors, fostering a more transparent business environment.

- Reducing Case Numbers: While the high volume of corruption cases indicates a strong focus on enforcement, deterrence should lead to a reduction in case numbers in the coming period. A cultural shift and enhanced preventative measures will further reduce the number of corruption cases in the longer term.

- Foreign Direct Investment: As anti-corruption measures strengthen, Saudi Arabia is poised to become more attractive to foreign investors, particularly in sectors aligned with Vision 2030.

- Improved Corruption Perceptions Index (CPI) Ranking: A noticeable improvement in Saudi Arabia's CPI score is crucial for boosting investor confidence. Over the last few years, there has not yet been a shift. The 2025 data release will be a key indicator of progress.

- Private Sector Compliance: As anti-corruption laws expand to cover the private sector, companies operating in Saudi Arabia will need to adopt stricter compliance protocols to mitigate risk.

- Whistleblower Protection: Stronger whistleblower protections under the Nazaha Law aim to encourage public participation in reporting corruption.

- Collaboration with Regulatory Bodies: Enhanced cooperation between Nazaha and the Saudi Central Bank (SAMA) will bolster financial integrity and combat money laundering and fraud.

ENDNOTES

1. Hijri calendar date: 29/12/1412
2. https://laws.boe.gov.sa/Files/Download/?attId=0f617e25-0191-40e1-bf4b-adbb010ed141
3. https://laws.boe.gov.sa/BoeLaws/Laws/Viewer/82434584-434c-462e-b663-adfd00c27a14?attachmentTitle=%D8%A7%D9%84%D9%85%D8%A7%D8%AF%D8%A9%20%D8%A7%D9%84%D8%AE%D8%A7%D9%85%D8%B3%D8%A9

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DISCLAIMER

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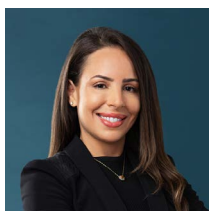UNITED KINGDOM
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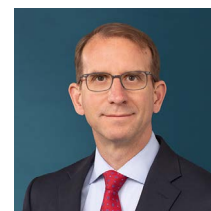## Greg Hallahan
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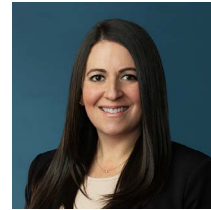*crichardson@secretariat-intl.com*

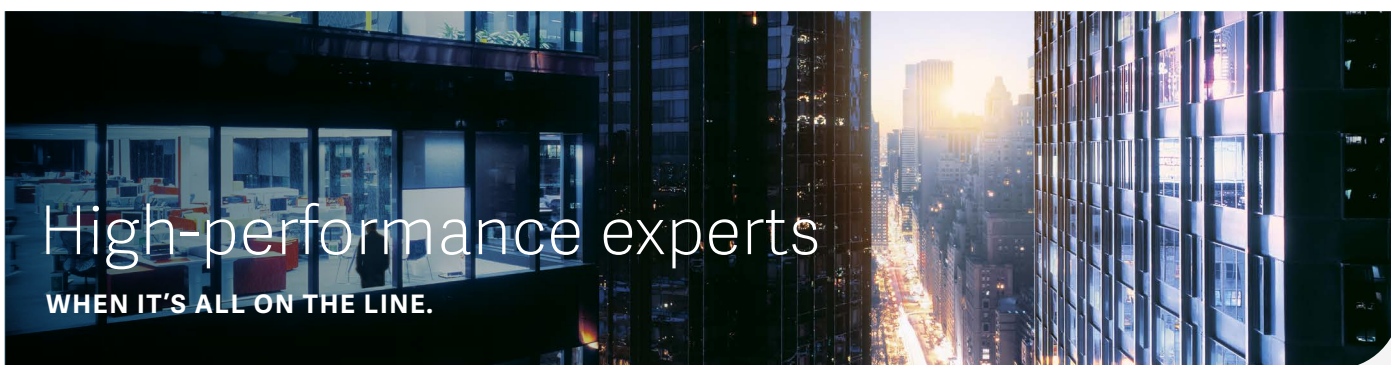## Bhavin Shah
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