



**Pakistan-India Legislators and Public Officials Dialogue
on Sharing of Experiences on Governance and Democracy**

Dubai, UAE

December 12, 2015

Background Paper

Anti-Corruption Mechanisms and Institutions to Address the Problem of Corruption in Pakistan



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Preface

Anti-Corruption Mechanisms and Institutions to Address the Problem of Corruption in Pakistan is a background paper authored by Mr. Shahid Hamid, former Governor of the Punjab, Pakistan and Senior Advocate, Supreme Court of Pakistan for the benefit of participants for the Pakistan-India Legislators and Public Officials Dialogue on Sharing of Experiences on Governance and Democracy, scheduled to be held in Dubai, UAE on December 12, 2015.

The paper outlines the evolution of the legal and regulatory framework setup in Pakistan to fight corruption. Mr. Hamid identifies institutions and mechanisms put in place in Pakistan to combat corruption, the challenges faced by them since their inception and the role the National Accountability Bureau (NAB) has played in this process. To give an international perspective Mr. Hamid has also touched upon Pakistan's ranking as compared to other countries on the perception of corruption indices over the years to-date.

Disclaimer

The views expressed in this paper belong to the author and do not necessarily represent the views of Pakistan Institute of Legislative Development and Transparency (PIL DAT).

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Abbreviations and Acronyms

PPC	Pakistan Penal Code
NAB	National Accountability Bureau
NAO	National Accountability Ordinance
NACS	National Anti-Corruption Strategy
KPECA	Khyber Pakhtunkhwa Ehtesab Commission Act
KP	Khyber Pakhtunkhwa
PML-N	Pakistan Muslim League- Nawaz
PPPP	Pakistan Peoples Party Parliamentarians
EBDO	Electoral Bodies Disqualification Orders
CPI	Corruption Perception Index
FIA	Federal Investigating Agency

About the Author



Mr. Shahid Hamid received his B.A. (Hons) and M. A. Economics degrees from the University of Cambridge, U.K and Barrister-at-Law from the Honourable Society of the Inner Temple, London. Mr. Shahid Hamid joined the Civil Services of Pakistan in 1964 and during his career from 1964-1976, he held many portfolios ranging from district administration to provincial finance department and later as Secretary to the Chief Minister, Punjab, Pakistan. He has practiced as an Advocate of the High Court from 1978 onwards and now serves as a senior and renowned advocate of the Supreme Court of Pakistan. He has also served as Federal Minister for Defence, Establishment & Law from Nov. 1996 - February 1997 and as Governor of the Punjab Province from March 1997 to August 1999.

Introduction

The cancer of corruption predates the Independence of Pakistan. In his address to the first Constituent Assembly on August 11, 1947 the Founder of our Country Quaid-e-Azam Muhammad Ali Jinnah had this to say:-

“The second thing that occurs to me is this. One of the biggest curses from which India is suffering — I do not say that other countries are free from it, but, I think, our condition is much worse — is bribery and corruption. (Hear, hear.) That really is a poison. We must put that down with an iron hand and I hope that you will take adequate measures as soon as it is possible for this Assembly to do so.

Black-marketing is another curse. Well, I know that black-marketers are frequently caught and punished. According to our judicial notions sentences are passed, and sometimes fines only are imposed. Now you have to tackle this monster, which today is a colossal crime against society, in our distressed conditions, when we constantly face shortage of food and or the essential commodities of life. A citizen who does black-marketing commits, I think, a greater crime than the biggest and most grievous of crimes. These black-marketers are really knowing, intelligent and ordinarily responsible people, and when they indulge in black-marketing, I think they ought to be very severely punished, because they undermine the entire system of control and regulation of food-stuffs and essential commodities, and cause wholesale starvation and want and even death.

The next thing that strikes me is this. Here again is a legacy, which has been passed on to us. Along with many other things good and bad, has arrived this great evil -the evil of nepotism and jobbery. This evil must be crushed relentlessly. I want to make it quite clear that I shall never tolerate any kind of jobbery, nepotism or any influence directly or indirectly brought to bear upon me. Wherever I find that such a practice is in vogue, or is continuing anywhere, low or high, I shall certainly not countenance it.”

Evolution of Legal and Regulatory Framework to Fight Corruption

The Penal Code enacted by the British in 1860 contained an entire Chapter, with as many as 11 separate sections defining, and providing for punishment of, offences relating to bribery, illegal

gratification and the like. This was not enough and consequently the Prevention of Corruption Act 1947 was enacted to make more effective provision for the prevention of bribery and corruption. Its focus was on public servants of the Federal Government.

The Sindh Province passed a similar law in 1950. Then in 1958, after promulgation of the first Martial Law, the provisions of the Prevention of Corruption Act 1947 were extended to the whole of the Province of the West Pakistan. This was followed by further laws setting up Anti-Corruption Establishments for the effective enforcement of the Anti-Corruption Laws. Simultaneously the concerned governments enacted good conduct rules to be observed by their employees alongwith efficiency and discipline rules providing for departmental action to punish violations of the good conduct rules.

In this overview of the state of affairs preceding the adoption of the 1973 Constitution mention may also be made of the summary dismissal of large numbers of allegedly corrupt government servants soon after the Martial Laws imposed in 1958 and 1969 and the disqualification and punishment of alleged corrupt politicians under the Electoral Bodies Disqualification Orders (EBDO) and other similar laws.

After adoption of the 1973 Constitution, the Federal Government proceeded to enact the Federal Investigation Agency Act 1974 to further strengthen the anti-corruption regime. Three years later came the third Martial Law and the trial of (some of) the offenses relating to illegal gratification were transferred to the Military Courts. Simultaneously Tribunals were set up to disqualify and punish allegedly corrupt politicians under the Holders of Representative Offices (Punishment for Misconduct) Order 1977 and the Parliament and Provincial Assemblies (Disqualification for Membership) Order 1977.

Martial Law was lifted in 1985 and the country returned to a limited degree of civilian democratic governance. It does not appear that the various legislative measures and prevention mechanisms, whether during the periods of military rule or the civilian dispensations, had any significant effect detailed hereinabove in reducing corruption.

Pakistan's Ranking on Corruption Perception Index

In the first Corruption Perception Index brought out by

Transparency International in 1995, Pakistan ranked 39th out of 41 countries included in the survey. Its position was 87th out of 99 countries in the year 1999, the start of the fourth period of Military rule.

Musharraf's tenure saw a number of new laws to tackle corruption including Special Powers Ordinances enacted by both the Federation and the Provinces for summary removal of (corrupt) government servants and, more importantly, the National Accountability Ordinance (NAO), 1999.

Musharraf's tenure ended in 2008. In that year Pakistan's ranking in the Corruption Perception Index (CPI) was 134 out of 180 countries. In the past two years 2014-2015 it has marginally improved. It is now 126 out of 175 countries.

Institutions and Mechanisms to Combat Corruption and Challenges

The laws are there. There is the Pakistan Penal Code (PPC), the Prevention of Corruption Act, and the National Accountability Ordinance.

The institutional mechanisms are also in place. There is the constitutional office of the Auditor-General of Pakistan supported by Public Accounts Committee of the National Assembly. There are the public procurement regulatory authorities to implement the public procurement rules both in the Federation and the Provinces. There are the offices of the Federal and Provincial Ombudsmen to provide relief to the citizens against maladministration. There is the National Accountability Bureau (NAB), the Federal Investigating Agency (FIA) and there are the Anti-Corruption establishments.

The question arises why we continue to suffer from a high degree of corruption, nepotism and jobbery despite identification of these diseases from even before the dawn of independence and despite the laws enacted and mechanisms put in place by both the civilian and the military governments.

One reason is undoubtedly the lack of public trust in the watchdogs established for tackling corruption. A PILDAT survey conducted in June 2015, for example, found that only 30% of the general public had (some or more) confidence in the National Accountability Bureau. It would only be fair to add that an even larger number, 39%, expressed no opinion. Public confidence in Police and the Tax and Public Finance

Administrations is much lower than the level of public trust in the Bureau.

Yet another reason is that the general public does not recognize corruption as a major societal issue. In the same PILDAT survey, corruption was identified as the biggest issue by only 3% of the interviewers – much after the Energy Crisis 25%, Unemployment 19%, Security Issues 14%, Poverty 12%, Inflation 10%, Drinking Water 6% and Education 4%. At all income levels the average citizen voices support for selections and appointments and decisions on merit except unfortunately, with honourable exceptions, when the matter relates to his own person or to his own relative or to his own case.

The problem is deep-seated because, as noted in the decisions of the Supreme Court reported at 1997 SCMR 353 and a number of subsequent cases, Pakistan is faced with systemic, i.e., institutional, apart from individual, corruption.

If the police, the tax administrations, and the subordinate judiciary amongst other institutions, are corrupt then there can be no short-term cure. It will require substantial and sustained efforts over years and years, to restructure these institutions and to restore public trust in them.

In the recent past both the electronic media and the social media have become more active in exposing acts of corruption, bribery and nepotism. The Right to Information Laws being enacted by the Federation and the Provinces under the aegis of Article 19A will surely help in the efforts to unearth corruption. All stakeholders have to play a role. Patriotism should be invoked.

The motto could be “If you love your country say **NO** to corruption”. However, there is a need to remain realistic.

Petty bribery to grease the system is so wide spread that it is not likely to be eliminated any time soon because the majority of our people simply do not regard it as anything other than a necessary nuisance.

Faced as we are with high levels of corruption it is not sufficient to enact stiffer laws. We have to look at root causes. When this is done, and study also made of similar situations in other developing countries, we find that corruption is a symptom of governance failures.

Governance standards require for their improvement, amongst other things, procedures for making government servants more accessible and accountable to the average citizen, bringing decision-making in regard to local issues especially health, education, sewerage, drinking water, streets and gas and electricity, closer to the citizens through empowered local governments and simplifying and reducing procedures for performance of simple tasks such as issue of licenses, permits, bills and the like.

Article 140A of the Constitution, re-enacted by the 18th Amendment, mandates each Province to establish a local government system and to devolve political administrative and financial responsibility and authority to local governments. Article 140A has to be made a vibrant reality. Elections to local governments have to be held with even greater regularity than those for the National and Provincial Assemblies. Control of the Provincial Governments over the local governments cannot be altogether removed but if governance standards are to be improved and citizens given a meaningful role in dealing with their local issues through their elected councillors, Provincial Government controls must not be allowed to stifle local initiatives.

Note has already been made of the importance of the Right of Information laws. According to the World Bank's legal department over 50 countries have passed freedom of information laws. Other international examples of efforts to disseminate information, to improve transparency and to promote accountability include Uganda's experiment with expenditure tracking surveys that publish data on government expenditures in delivering services, participatory budgeting in some cities of Brazil, Citizens Charter in some cities of the Philippines, report card on government services in Bangalore, India and the Citizens Charter in Malaysia which empowers citizens to demand accountability of government servants if specified service standards are not met.

Role of the National Accountability Bureau (NAB) to Combat Corruption

International experience indicates that while anti-corruption agencies and mechanisms have an understandable appeal for dealing with the abuse of public office for private gain, such approaches mostly succeed where the levels of corruption are relatively modest. Where corruption is wide-spread much greater effort has to be given to address the dysfunctional

governance environment.

International experience also indicates that raising salaries of poor paid government servants does not always reduce corruption levels. Quite often it simply raises the price paid to obtain government jobs, to persons in a position to secure these jobs for the applicants.

The premier watchdog organization in Pakistan is the National Accountability Bureau (NAB) established under the National Accountability Ordinance (NAO) 1999. The idea of an empowered national accountability organization was conceived and put in place by the Caretaker Government appointed by the late Sardar Farooq Ahmad Khan Leghari, the then President of Pakistan, in 1996. The Caretaker Government promulgated the Ehtesab Ordinance 1997 which was later re-enacted, with some amendments, as the Ehtesab Act 1997. Regrettably these amendments proved to be controversial because of the transfer of powers from the Chief Ehtesab Commissioner appointed under the Ordinance to an Ehtesab Bureau headed by a political appointee.

The National Accountability Ordinance repealed the Ehtesab Act 1997 as also the Holders of Representative Offices (Punishment for Misconduct) Order 1997 and the Parliament and Provincial Assemblies (Disqualification for Membership) Order 1977. The Ordinance applies to all persons in Pakistan including residents of the federally and provincially administered tribal areas. The NAB established under this Ordinance is designed both to prevent corruption and to hold accountable those against whom corruption is proved.

The holders of public offices against whom NAB can proceed include former Presidents and Governors and former and serving Prime Ministers, Chairman Senate, Speakers of the National and Provincial Assemblies, Chief Ministers, Federal and Provincial Ministers and Chairmen of Local Governments. The list does not include serving Judges of the Superior Courts or serving members of the Armed Forces.

The Chairman of the NAB is appointed by the President of Pakistan in consultation with the Leader of the House and the Leader of the Opposition in the National Assembly for a non-extendable period of four years. A person cannot be appointed as Chairman NAB unless he is a retired chief justice or retired judge of the Supreme Court or a retired Chief Justice of a High Court or a retired 3-star officer of the Armed Forces or a retired Federal Government officer in BPS-22 or

equivalent.

The Prosecutor-General of the NAB is appointed by the President in consultation with the Chairman NAB and can be so appointed only if he is qualified to be a judge of the Supreme Court.

Section 9 of the 1999 Ordinance prescribes the very large number of offences constituting corruption and corrupt practices. They include illegal gratification, bribery, dishonest or fraudulent misappropriation, holding assets disproportionate to known sources of income, misuse of authority, willful default of loans, cheating, criminal breach of trust and criminal conspiracy. Offences under the Ordinance are non-bailable though concession of bail can be and has been obtained by large number of accused under the constitutional jurisdiction of the Superior Courts. Trial of offences under the Ordinance is entrusted to accountability courts who take cognizance on the basis of references filed by the Chairman NAB or an officer authorized by him.

The NAB initiates action on the basis of references received from an appropriate government or on receipt of complaints from the public or *suo moto* on its own accord. There are three stages; inquiry, investigation and filing of reference. At the inquiry stage an accused person has the option of voluntary return. After the inquiry has been converted into an investigation a plea bargain is possible only with the approval of the competent court. In cases of willful default of loans the permission of the Governor State Bank of Pakistan is required before any inquiry or investigation is initiated by NAB, or reference filed, by the NAB.

A person convicted of an offence under the Ordinance can be punished by the accountability courts for imprisonment upto fourteen years and with fine and with forfeiture of assets acquired through corruption and corrupt practices. Further, such convicted person stands disqualified for a period of ten years from holding public office and is also disentitled to grant of any financial facility from a bank or financial institution in the public sector for the said period.

The convicted persons can appeal against convictions and sentences to the High Court within 30 days. The NAB also has a right of appeal against acquittals.

All ministries, divisions and departments and authorities of the Federal and Provincial Governments are required to furnish to NAB a copy of any contract in which the monetary value is Rs. 50.00 million

(Pakistani Rupee) or more. The NAB is required to take various measures specified in section 33C of the Ordinance for the prevention of corruption. The Chairman NAB is also required to furnish an annual report to the President of Pakistan, which is to be made public.

The NAB has power to liaise with foreign states and to seek their co-operation for the prevention and detection of corruption and corrupt practices and for tracing out the foreign assets of accused and convicted persons. It would be appropriate to note here that in 2001 Pakistan endorsed the ADB-OECD Anti-Corruption Plan and in 2007 Pakistan ratified the UN Convention against Corruption. Since then Pakistan has also signed the Convention against Transnational Organized Crime.

All banks and financial institutions are required to report to NAB suspicious financial transactions, which have no apparent genuine economic or lawful purpose. The failure to furnish such information is an offence punishable with five years imprisonment.

The NAB's annual report for 2014 reveals that out of 93 decided cases in that calendar year it secured convictions in 44. Pending cases in the accountability courts at the end of the year 2014 were 675. Although the conviction rate is higher than that in other criminal courts the fact remains that it is less than 50% and pace of decisions is decidedly slow.

In its annual report the NAB also highlights that it recovered as much as Rs.2.793 billion from 375 accused persons through voluntary returns and plea bargains. Number of suspicious transactions reported to the NAB by banks and financial institutions was 19 only. Requests for assistance to foreign countries numbered 25 to which there were 16 responses. Number of inquiries pending with NAB at the end of 2014 was 932, number of investigations 279. Evidently much work needs to be done to speed up the pace of inquiries and investigations and trials.

It is self-evident that the NAB has vast powers. The question arises why it has nevertheless not been able to make sufficient impact for preventing and punishing corruption and corrupt practices. The reason is that within a short time of its establishment, and notwithstanding the fact that it was headed by serving or retired 3-star officers, the NAB became politicized. Inquiries were stifled and “put on ice” for political and other reasons. References filed in Court were not properly pursued. Some of the damage done is at long last being repaired in the last year or so. However, as the

PILDAT survey referred to earlier indicates, it will take some time before public trust in the NAB rises to acceptable levels.

In 2002 the then military government came out with a National Anti-Corruption Strategy (NACS). Sadly there has been no effort to take stock of and/or to update this strategy either during the five years of the last PPP government or during the two and half years of the present PML-N government.

The NACS aimed at blocking corruption through a three-fold mutually reinforcing system based on prevention, monitoring and combating. The main elements of this strategy included Political Will, Transparency, Accountability, Meritocracy, Deregulation, Regularization of Discretionary Powers, Standardization and Automation, Efficiency of Service Delivery and Public Participation.

The torch bearer for implementation was to be the NAB. However, the NAB failed to play its assigned role and it is doubtful whether any of the other ministries, departments and authorities of the Federal and Provincial Governments even thought of any meaningful steps for its implementation. It may be added that the various elements of the strategy basically high-lighted the need for better governance standards without however spelling out the manner and time frames for achieving such reforms.

There is a perception that corruption levels are higher in the second largest province but in the absence of hard data it would be invidious to say more especially when none of the other governments are taint-free.

Note needs to be taken here of the extra effort made by the Khyber Pakhtunkhwa Government to combat corruption through enactment of the Khyber Pakhtunkhwa Ehtesab Commission Act (KPECA) 2014. To an extent the provisions of this Act run parallel to those of the National Accountability Ordinance. However, there are several points of departure including the establishment of a Provincial Assembly Legislative Committee to confirm nominations made by the Search and Scrutiny Committee for appointment of the 5 members of the Ehtesab Commission. Membership of the Search and Scrutiny Committee is itself subject to the approval of the Legislative Committee, which is also to review the reports of the Ehtesab Commission. In this manner the KP law provides for legislative oversight of the accountability mechanism. It would be premature to comment on the performance of this Commission as it has only recently

been constituted. It is to be hoped that it will complement and supplement, and not conflict, with the working of NAB.

For democracy to establish firm roots requires the unshakable determination of the people of Pakistan that they shall not tolerate or permit any violation of the Constitution.

Similarly, the reduction of corruption in our system requires ever-stronger affirmation by people that the rule of law shall prevail within the framework of the Constitution, that there shall be rigorous implementation of the plethora of anti-corruption laws on the statute books and that there shall be continuous strengthening of the accountability mechanisms already in place. It also requires a fundamental change in public attitudes. The national goal should aim at zero tolerance for corruption and corrupt practices.

End Notes

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 - (iv) The Criminal Law Amendment Ordinance, 1944.
 - (v) The Prevention of Corruption Act, 1947.
 - (vi) The Sindh Prevention of Bribery & Corruption Act, 1950.
 - (vii) The Removal from Service (Special Powers) Sindh Ordinance, 2000.
 - (viii) Sindh Civil Servants (Efficiency and Discipline) Rules, 1973.
 - (ix) Sindh Police (Efficiency and Discipline) Rules, 1988.
 - (x) Pakistan Criminal Law Amendment Act, 1958.
 - (xi) Punjab Employees Efficiency, Discipline and Accountability Act, 2006.
 - (xii) The Prevention of Corruption Act (West Pakistan Extension) Ordinance, 1958.
 - (xiii) The West Pakistan Departmental Enquiries (Powers) Act, 1958.
 - (xiv) The West Pakistan Anti-Corruption Establishment Ordinance, 1961.
 - (xv) The Punjab Anti-Corruption Establishment Ordinance, 1961.
 - (xvi) The Anti-Corruption Laws (Application to Tribunal Area) Regulation, 1965.
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 - (xxii) Pakistan Criminal Law Amendment (Punjab) Rules, 1985.
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 - (xxxi) Pakistan Railways Police Act, 1977.
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 - (xxxiii) North-West Frontier Province Police Rules, 1975.
 - (xxxiv) North-West Frontier Province Removal from Service (Special Powers) Ordinance, 2000.
 - (xxxv) North-West Frontier Province Government (Efficiency & Discipline) Rules, 1973.
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