



INDEPENDENT AUTHORITY AGAINST
CORRUPTION OF MONGOLIA

ANNUAL REPORT 2025





FOR JUSTICE
AND
DEVELOPMENT

ANNUAL REPORT 2025



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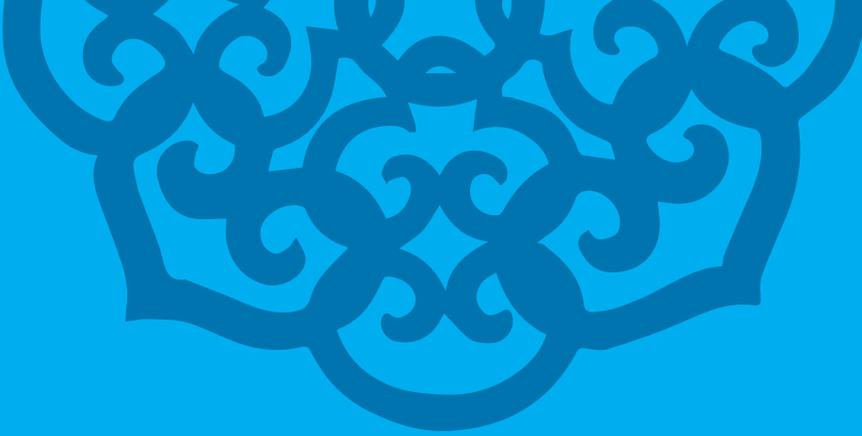


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HIGHLIGHTS OF 2025

Mongolia was elected as the Chair of the 10th Annual General Meeting of the Asset Recovery Inter-Agency Network – Asia Pacific (ARIN-AP) and successfully hosted the meeting in Mongolia from 23 to 26 September 2025.

The meeting was attended by 150 participants and delegates, including representatives of ARIN-AP member countries, international, regional, and national law enforcement and anti-corruption agencies, as well as three international organizations, namely the United Nations Office on Drugs and Crime (UNODC) and the Asset Recovery Network of the Middle East and North Africa (MENA-ARIN).

The participants comprised 60 delegates from 13 foreign countries and 90 representatives from 13 law enforcement agencies of Mongolia.



The primary objective of the meeting was to strengthen regional cooperation in combating corruption, upholding justice, and disrupting illicit financial flows. The meeting was convened under the overarching theme, “Asset Recovery of Digital Assets and the Legal Framework for Asset Management.” Within this framework, participants discussed methods and good practices for using AI technologies in digital asset recovery, legal frameworks for non-conviction-based asset confiscation, regional cooperation, and emerging trends in asset management. As part of these discussions, representatives from Australia, Thailand, Malaysia, the Philippines, Papua New Guinea, India, and New Zealand delivered presentations and engaged in discussions, sharing international best practices and practical experiences.

A Memorandum of Understanding on Cooperation was signed with the Malaysian Anti-Corruption Commission.

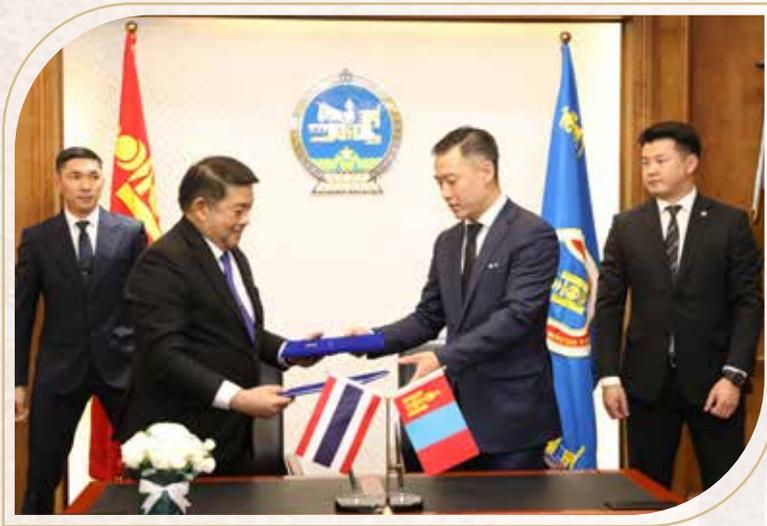


At the invitation of Commissioner General Zandraa Dashdavaa, Director of the Independent Authority Against Corruption (IAAC), a delegation led by Tan Sri Dato' Sri Azam bin Baki, Chief Commissioner of the Malaysian Anti-Corruption Commission (MACC), paid a working visit to Mongolia from 24 to 28 February 2025.

Within the framework of the visit, the two sides expressed a shared commitment to comprehensive cooperation in the field of prevention and fight against corruption and signed a "Memorandum of Understanding on Cooperation in Corruption Prevention and Combating Corruption between the Independent Authority Against Corruption of Mongolia and the Malaysian Anti-Corruption Commission."



A Memorandum of Understanding on Cooperation was signed with the National Anti-Corruption Commission of the Kingdom of Thailand.



A delegation led by Mr. Phattarasak Vannasaeng, Deputy Commissioner of the National Anti-Corruption Commission of the Kingdom of Thailand, paid a working visit to Mongolia from 9 to 13 June 2025.

During the visit, the two sides held official meetings and agreed to further strengthen and deepen friendly inter-institutional relations, enhance capacity building and professional training of officials, promote mutual exchange of experience, and pursue active and sustained cooperation in the future. In this context, the Independent Authority Against Corruption of Mongolia and the National Anti-Corruption Commission of the Kingdom of Thailand signed a Memorandum of Understanding on Cooperation in Corruption Prevention and Combating Corruption

A request for Mutual legal assistance was submitted.

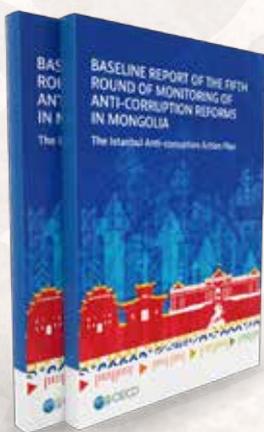
In 2025, within the framework of international treaties on mutual legal assistance, the IAAC submitted requests for legal assistance to the competent authorities of the French Republic, the Republic of Kazakhstan, the United States of America, the People's Republic of China, the Hong Kong Special Administrative Region of the People's Republic of China, and the Office of the Attorney General of the British Virgin Islands.

In addition, in connection with a request submitted to the Republic of Austria in 2024 concerning the freezing of assets derived from criminal activities, information exchange and investigative cooperation continued in 2025. The IAAC also received a mutual legal assistance request from the Ministry of Justice of Japan, carried out specific investigative actions, and transmitted the response to the requesting authority.

Restrictions were imposed on account transactions on Binance.

During criminal investigations, cryptocurrency assets derived from criminal activities were identified, and measures were taken through the competent authorities to restrict transactions on the related account on the Binance platform. The case was referred to the prosecutor with a recommendation for transfer to court, and further steps are being taken to transfer the seized cryptocurrency assets to the state budget.

The monitoring report on the implementation of the Anti-Corruption Action Plan was received.



The IAAC received the 5th round monitoring report of the Istanbul Anti-Corruption Action Plan, which was presented at the Plenary Meeting of the Anti-Corruption Network for Eastern Europe and Central Asia (ACN) of the Organisation for Economic Co-operation and Development (OECD).

Joint task force

Based on Resolution No. 4/02 dated 29 May 2023 of the Prosecutor overseeing inquiry and investigation activities of the Prosecutor General's Office, a joint order No. A/34 and A/134 dated 31 May 2023 of the IAAC and the National Police Agency established a joint task force. The investigation is ongoing into allegations that individuals connected to high-ranking civil servants unlawfully received scholarships from the Education Loan Fund under the Ministry of Education and Science, failed to repay them, misappropriated scholarship funds through personal accounts, and may have been involved in money laundering.

Investigations were conducted in a total of 103 “coal” cases.

Based on Resolution No. 4/04 dated 5 December 2022 of the Office of the Prosecutor General, a joint task force comprising 21 investigators was established pursuant to Joint Orders No. A/101, A/119, and A/326 dated 6 December 2022 issued by the heads of the IAAC, the General Intelligence Agency, and the National Police Agency to conduct investigations into cases related to coal mining, exports, coal transportation at border checkpoints, and associated payments.

The task force has conducted investigative proceedings in 103 cases, of which 59 cases have been resolved. Among these, 15 cases involving 83 suspects have been resolved by the courts. Investigations are ongoing in 36 cases.

A total of 3,034 complaints and information reports were received

In 2025, the IAAC received a total of 3,034 complaints and reports from citizens, business entities, organizations, and public officials, which were reviewed and processed by the relevant departments as follows:

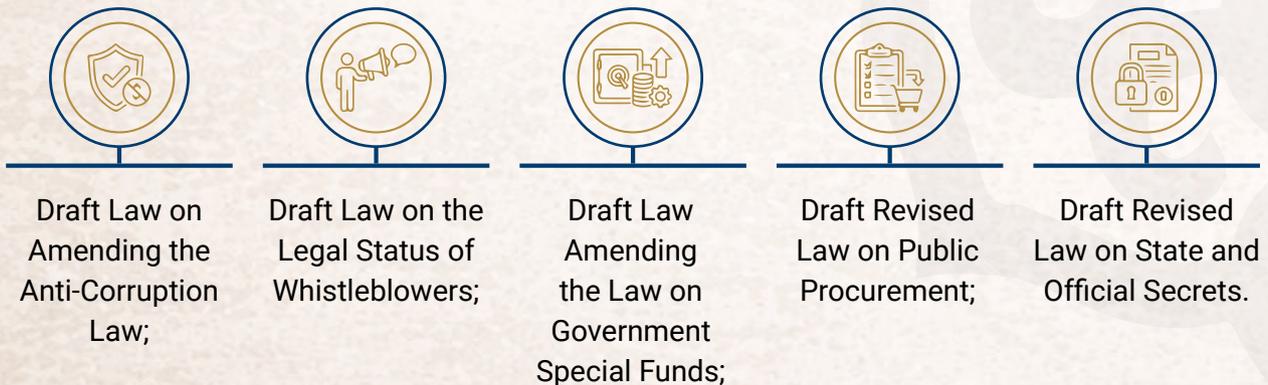


Reporting Period vs. Same Period Previous Year



Officials of the Independent Authority Against Corruption (IAAC) participated in and contributed to the working groups tasked with drafting amendments to the Criminal Code and the Criminal Procedure Code.

Proposals were prepared and formally submitted to the relevant legislative initiators and competent authorities on the following draft laws:



Proposals related to these draft laws and associated regulations were conveyed to the Cabinet Secretariat of the Government, the Ministry of Justice and Internal Affairs, and other authorized institutions and officials.

Crime statistics were submitted to the National Statistics Office

In accordance with the Law on Combating Corruption and the Law on Regulating Public and Private Interests in Public Service and Preventing Conflicts of Interest, information on the 2024 declaration submission process of officials required to file asset and interest declarations, as well as data on the updated registration of 2024 declarations of personal interests and assets and income, was submitted to the Standing Committee on Legal Affairs of the Parliament.

Pursuant to the Procedure for Providing Information to the National Security Council of Mongolia, approved by Presidential Decree No. 73 of 2024, relevant information was submitted to the National Security Council.

In addition, reports on asset and income declarations, data on complaints and information related to crimes subject to investigative activities, and crime statistics were compiled and submitted to the National Statistics Office, thereby ensuring compliance with the relevant legal requirements.

“Mongolian Institutional Integrity and Transparency (MINT)” project Phase II

Within the framework of the Project “Mongolian Institutional Integrity and Transparency (MINT)”, the opening ceremony for Phase II, to be implemented by the International Development Law Organization (IDLO), took place at IAAC on 12 December 2025. Mr. Richard Buangan, U.S. Ambassador to Mongolia, and Mr. Charles Bolland, Resident Representative of IDLO attended the opening ceremony. The phase II is designed to strengthen systems for the investigation,

detection, and prevention of corruption offenses, enhance oversight mechanisms, and improve financial investigation capacities including the monitoring of assets, income, and expenditures, as well as mutual legal assistance. The project also aims to build the professional capacity of investigators, and to increase public knowledge and awareness of corruption prevention and anti-corruption efforts.



NATIONAL ANTI-CORRUPTION STRATEGY

Recommendations Issued to 128 Implementing Institutions under the National Anti Corruption Strategy.

In accordance with Resolution No. 46 of 16 May 2024 of the State Great Khural /Parliament/ of Mongolia approving the Action Plan for the Implementation of the National Anti-Corruption Program, activities are being carried out to organize implementation, coordinate the actions of responsible institutions nationwide, provide recommendations and professional and methodological support, conduct oversight, consolidate reports, and perform monitoring and evaluation.

Under the Action Plan for Implementing the National Anti-Corruption Strategy (2023–2030), a total of 122 measures were planned for implementation in 2024. In cooperation with the Cabinet Secretariat of the Government, monitoring and evaluation of the implementation status were conducted in accordance with the General Procedure for Monitoring and Evaluation of Policy Document Implementation and the Activities of Administrative Bodies, approved by Government Resolution No. 206 of 2020, resulting in an overall implementation rate of 66.1 percent for 2024.

Based on the monitoring and evaluation findings, and with a view to strengthening result-oriented implementation and ensuring performance, recommendations on further actions were delivered to 128 institutions responsible for implementing the National Program, and follow-up oversight of implementation is being carried out.

A Special Action Plan for Improving Integrity Assessment Scores was approved.

Within the framework of Measure 2.6 under Objective 2 of the Program, meetings were held with authorized officials of institutions that received the lowest scores in the 2024 Integrity Assessment, including the Ministry of Education and Science, the Ministry of Mining and Heavy Industry, the Mineral Resources and Petroleum Authority, the National Agency for Meteorology and Environmental Monitoring, the National Geological Survey, and the Governor's Offices of Bayankhongor, Dornod, Zavkhan, Khovd, and Sukhbaatar aimags.

As a result of these meetings, a Special Action Plan for Improving Integrity Assessment Scores was approved by the respective institutions. Throughout the implementation process, professional and methodological support, advisory assistance, and oversight were provided.

The anti-corruption standard is being introduced in 45 state-owned legal entities.

Under the plan to introduce the ISO 37001 Anti-Corruption Management System in 45 state-owned legal entities by 2030, the standard has been implemented by Erdenet Mining Corporation SOE, Darkhan Metallurgical Plant SOE, Cement Lime LLC, Information and Communication Network LLC, State Housing Corporation LLC, MIAT Mongolian Airlines SOE, and the National Power Transmission Center SOE.

Monitoring Corruption Risks in the Budgeting, Financing, Expenditure, and Implementation of Construction Projects

To prevent corruption risks and disrupt corrupt practices, independent oversight was exercised over the budgeting, financing, expenditure, and implementation of construction and infrastructure projects planned under national development policy and planning frameworks. Preventive measures were implemented to mitigate potential corruption risks.

Recommendations on preventing corruption and conflicts of interest were provided to the management of the Erdeneburen Hydropower Plant Project, and an online meeting was held with relevant officials of Khovd aimag. In addition, recommendations were submitted to the Chairperson of the Khovd Aimag Citizens' Representative Khural to ensure compliance with anti-corruption legislation, including prohibitions against undue influence on project staff and granting preferential treatment to

specific legal entities.

Meetings and training sessions were conducted with authorized officials of the Metro Construction Project Unit, during which guidance and information were provided on preventing corruption and conflicts of interest.

A series of meetings were also held with managers and staff of the following projects: "Construction of Additional Two Lanes on the Ulaanbaatar-Darkhan Road," "Green Lake-1,008 Housing Units," "Ulaanbaatar Metro," "Ulaanbaatar Tram," "Tuul Expressway," "New Ring Road," "Cable Transport System," "Bus Rapid Transit," and the "Energy Package Project." During these meetings, regular guidance and information on corruption risk prevention were provided. Relevant recommendations were submitted to the respective project units and to the Governor of the Capital City and Mayor of Ulaanbaatar.

FOREIGN RELATIONS AND COOPERATION

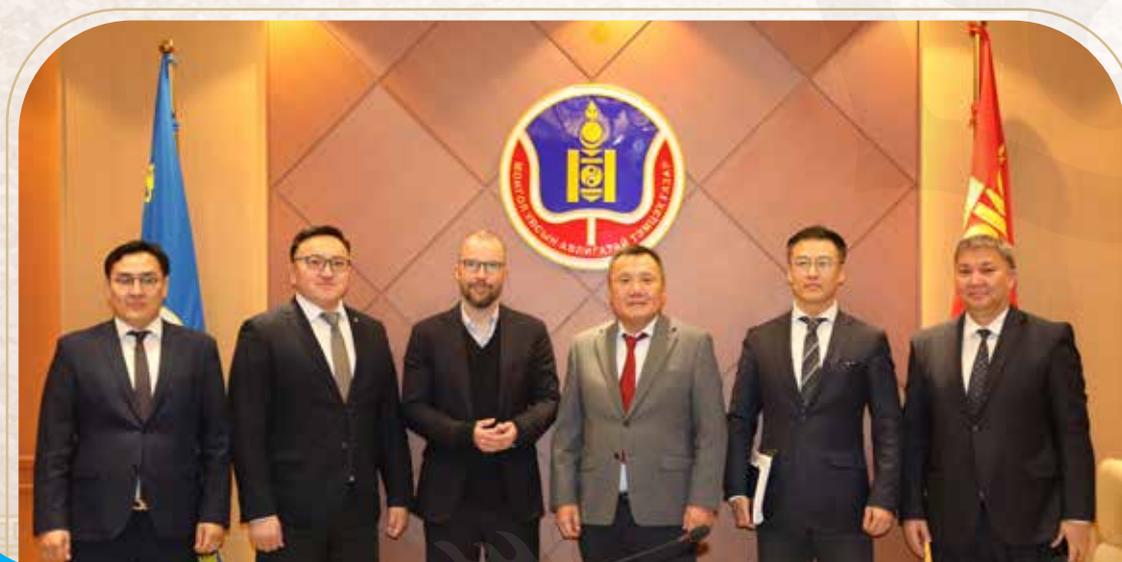
In 2025, the IAAC expanded and strengthened its foreign relations and international cooperation, successfully fulfilled its international obligations, and collaborated closely with international and foreign counterpart institutions to facilitate the effective implementation of the United Nations Convention against Corruption.

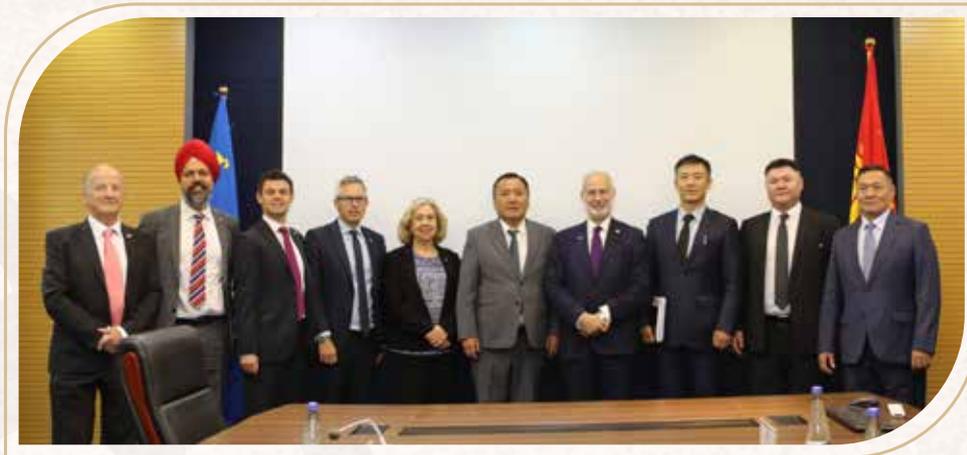
Strengthening Cooperation with the Anti-Corruption Agency of Uzbekistan

The IAAC worked to advance cooperation with the Anti-Corruption Agency of the Republic of Uzbekistan in the areas of corruption prevention and public awareness; ensuring transparency and openness in the activities of public service and state institutions; exchange of best practices; and enhancement of the professional capacity of officials. In this context, the IAAC undertook collaborative preparatory efforts to conclude a Memorandum of Understanding in these areas.

On 1 April 2025, Mr. Ben Buckland, Senior Advisor of the Association for the Prevention of Torture (APT), was welcomed by Commissioner General Zandraa Dashdavaa, Director of the IAAC, Deputy Commissioner General Azjargal Gavaasuren, and Head of the Administration Department and Chief Commissioner Baasannyam Zagraa.

During the meeting, the parties discussed bilateral cooperation and the introduction of the PEACE model, a framework for conducting effective and ethical interviewing during investigative procedures, into IAAC operational practice.





On 25 June 2025, a delegation led by Commissioner General Zandraa Dashdavaa, Director of the IAAC, welcomed Mr. Fabian Hamilton, Chair of the British Group of the Inter-Parliamentary Union (IPU) of the UK Parliament along with his delegation.

During the meeting, the IAAC presented information on its anti-corruption policies and activities, international cooperation, and the legal and regulatory framework for combating corruption.



On 31 January 2025, Mr. Andrew Berryman, Deputy Head of Mission, and Mr. Haidar Arshad, Political Officer of the Embassy of Australia, On 18 March 2025, Mr. David Sutcliffe, International Liaison Officer of the National Crime Agency of the United Kingdom of Great Britain and Northern Ireland based in Beijing, on 20 March 2025, Mr. Jeff Kokles, Liaison Officer of the Australian Federal Police in Beijing visited IAAC and were welcomed by Chief Commissioner Azjargal Gavaasuren, Deputy Director of the IAAC.

During these meetings, the IAAC's mandate and operational activities were presented, and matters of cooperation were discussed.

On 16 June 2025, Chief Commissioner Azjargal Gavaasuren, Deputy Director of the IAAC welcomed representatives of the International Monetary Fund (IMF). During the meeting, information was provided on the policies and activities implemented within the framework of the “Year of Combating Corruption,” the legal and regulatory environment, and the implementation of the National Anti-Corruption Strategy, as well as on issues related to budgetary and financial oversight and the governance of state-owned enterprises.



On 5 August 2025, representatives of the IAAC met Ms. Sara Beth Mashl, Regional Security Officer, and Mr. Shawn Hsiang, Assistant Legal Attaché of the Embassy of the United States of America, and discussed strengthening future cooperation.



On 31 October 2025, the IAAC received a delegation led by Mr. Benedict Hofmann, Deputy Regional Representative for Southeast Asia and the Pacific of the United Nations Office on Drugs and Crime (UNODC), together with Mr. Duc Long Nguyen, Head of the UNODC Office in Mongolia. During the meeting, the parties held in-depth discussions and exchanged views on training to enhance the professional capacity of officials and on future areas of cooperation.



Authorized officials participated in the sessions held from 8 to 14 March 2025 for the consideration and defense of Mongolia's Seventh Periodic Report on the implementation of the International Covenant on Civil and Political Rights (ICCPR) and provided information on relevant issues.

On 11 April 2025, Ms. Nadiya Sirenko, Legislative Support Officer, Mr. Goran Petrov, Election Adviser, and Mr. Fernando Casal Bértoa, Member of the OSCE Office for Democratic Institutions and Human Rights (ODIHR), were welcomed by Chief Commissioner D. Dulamsuren, Head of the relevant IAAC department, and Senior Commissioner B. Bayarsaikhan.

During the meeting, information was provided on the legal and regulatory framework and oversight mechanisms related to political party financing, and views were exchanged on international good practices in this area.

IAAC officials participated in a number of international anti-corruption forums and meetings held abroad, including the Partnerships Anticorruption Global Forum, the Southeast Asia Anti-Corruption Conference: Recalling the Jakarta Statement, Camden Asset Recovery Inter-Agency Network (CARIN) Annual General Meeting, the 6th Plenary Meeting of the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE), the Asia Regional Meeting on Corruption and Tax, the Plenary Meeting of the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN), the 2025 Annual Meeting and Technical Assistance and Training Forum of the Asia/Pacific Group on Money Laundering (APG), the Plenary Meeting of the Middle East and North Africa Asset Recovery Inter-Agency Network (MENA-ARIN), the OECD Anti-Corruption Network Law Enforcement Network (ACN-LEN) Meeting, and the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC).

PREVENTION AND PUBLIC AWARENESS

Within the mandate to organize nationwide anti-corruption public awareness and prevention activities, coordinate implementation efforts, develop integrated programs, provide methodological guidance, and monitor execution, the following activities were carried out.

Public Awareness Activities Reached 57,772 Participants

To ensure the implementation of anti-corruption legislation and the National Anti-Corruption Program, and to strengthen corruption prevention and public awareness efforts, cooperation was carried out with 107 non-governmental and civil society organizations. Within this framework, the following campaigns, programs, and activities were organized, reaching a total of 57,772 participants:



Anti-corruption training programs



“Being Honest Is the Best” public awareness event



“Mock Trial 2025” moot court competition



“Justice Club” training activities



Activities in the social protection sector



Training of trainers programs



“Teamwork & Teamplay Mongolia” program



“Together for a Just Society” awareness event and training



Joint training programs implemented in cooperation with non-governmental organizations

85 recommendations were issued to 79 organizations

Review of Regulatory Frameworks

Eliminating Conditions Conducive to Corruption

SCOPE OF REVIEW

TOTAL ACTS REVIEWED:
244 DECISIONS, RULES,
AND REGULATIONS.

SECTOR COVERAGE:
CONDUCTED ACROSS
17 DIFFERENT
SECTORS.

OBJECTIVE:
IDENTIFYING AND
ADDRESSING
CONDITIONS THAT
CREATE CORRUPTION
RISKS.

LEGAL OUTCOMES

FULLY ANNULLED

101

Administrative normative acts
completely removed.

PARTIALLY ANNULLED

6

Specific provisions of acts
revised or annulled.

In addition, to prevent corruption-related crimes and violations, address underlying causes and conditions of corruption, halt corrupt practices, mitigate their consequences, reduce bureaucratic obstacles in public service delivery, and lower corruption risks, 85 recommendations were issued to 79 institutions on a cumulative basis, and follow-up monitoring of implementation is ongoing.

Furthermore, on-site reviews were conducted at 156 public institutions to identify corruption risks, causes, and enabling conditions, as well as to prevent corrupt practices and mitigate their consequences. Based on these reviews, recommendations were issued to 40 institutions, mandatory requirements to 10 institutions, and methodological guidance to 12 institutions.

RESEARCH AND ANALYSIS

The Integrity Assessment

The Integrity Assessment is an evaluation based on a total of **62 sub-indicators across** three main indices: the External Fairness Assessment, the Internal Fairness Assessment, and the Policy Participant Evaluation of each institution. These indices are defined as follows:

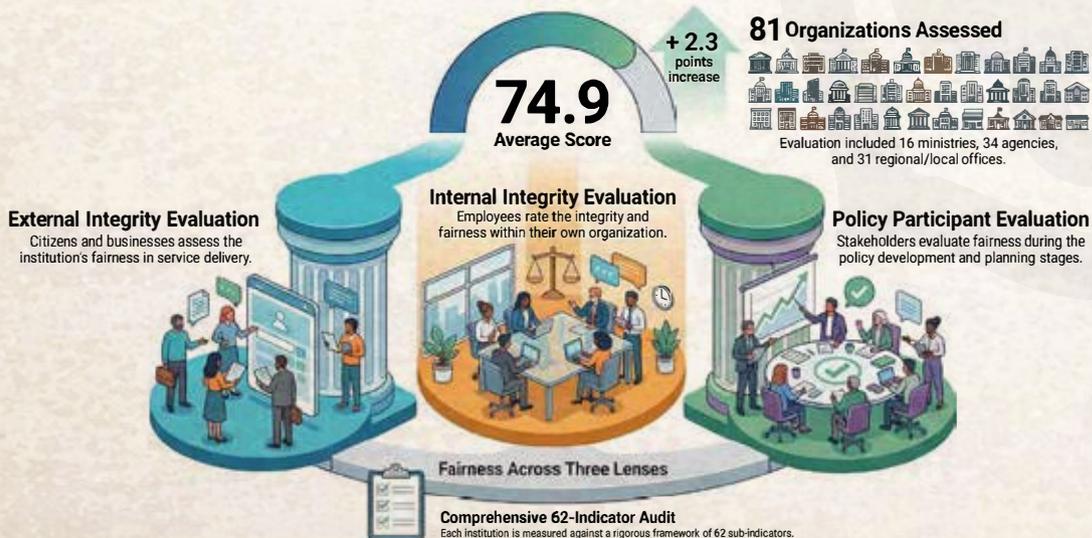
External Integrity Evaluation: This reflects the assessment of the institution's fairness by external stakeholders, including citizens, businesses, and organizations that have received services from the institution.

Internal Integrity Evaluation: This represents the evaluation provided by the institution's employees regarding its integrity and fairness within the organization.

Policy Participant Evaluation: This refers to the assessment given by those involved in the stages of policy development and planning, reflecting their views on the institution's fairness in the policy-making process.

The 2025 Integrity Assessment involved 81 organizations, including 16 ministries, 34 agencies, the Governor's Offices of 21 provinces, the capital city, and 9 districts. The average score was 74.9, representing an increase of 2.3 points compared to the previous year.

2025 Institutional Integrity Assessment: Framework & Results



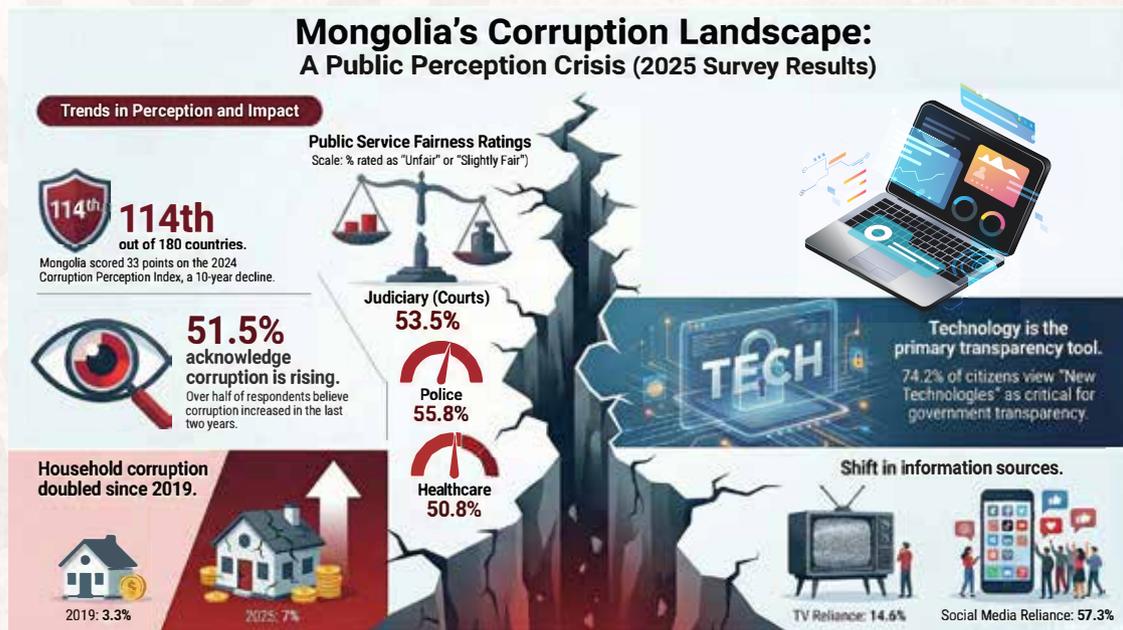
Public Perception and Awareness Survey on Corruption

The survey covered a total of 780 respondents, of whom 51.5 percent believed that the level of corruption had increased over the past two years. The findings also indicate limited optimism regarding improvements in the corruption situation in the near future.

According to respondents, high-level and systemic corruption is more prevalent than petty corruption, accompanied by a decline in public trust in state and law enforcement institutions. The main causes identified include the intersection of state and business interests, weak institutional accountability mechanisms, and the vulnerability of law

enforcement and oversight bodies to corruption.

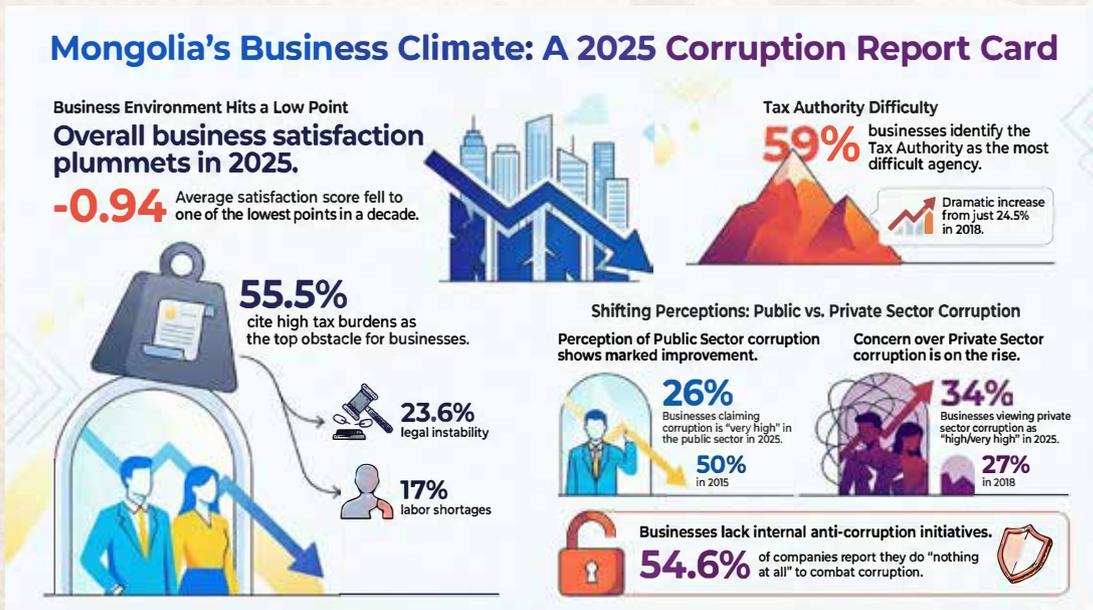
Public attitudes further suggest that strengthening the legal and regulatory framework, enhancing oversight and accountability of asset and income declarations, and expanding digitalization and transparency of public services are considered the most effective measures to reduce corruption. The survey results are intended to inform institutional policies and activities, particularly in efforts to improve legislation, reinforce accountability mechanisms, and increase transparency.



Corruption in the Business Environment

The survey indicates a decline in satisfaction with the business environment, with 40.2 percent of respondents expressing dissatisfaction, reflecting a more challenging business climate and weakened business confidence in Mongolia.

- ✓ The manufacturing and service sectors demonstrated the most negative perceptions. In particular, 67 percent of service sector enterprises and the majority of manufacturing companies reported being dissatisfied with the business environment.
- ✓ Small and large enterprises reported higher levels of dissatisfaction, while the construction and mining sectors expressed notably negative views regarding the corruption situation.
- ✓ Conversely, business representatives perceived a decline in corruption within civil services, while assessing that high-level corruption has increased.



INSPECTION AND ANALYSIS

Declaration Submission

Within the statutory deadline of 15 February 2025, a total of **48,841** public officials from 130 organizations nationwide submitted and confirmed their Declarations of Assets and Income (DPAI) on time. Of these, **45,630** declarations were submitted electronically and **3,211** were in printed form.

The summary of the 2024 asset and income declarations of state and local administrative officials was published on 30 June 2025 on

the website <http://www.xacxom.iaac.mn>, ensuring transparency and public access.

Under risk-based planned inspections, the declarations of **24** officials were reviewed and resolved. As a result, **9** officials were held liable in accordance with anti-corruption legislation, and potential cases of unjustified enrichment involving **3** officials were identified and referred to the Investigation Department of the Authority for further examination.

Resolution of Complaints and Information Related to Conflicts of Interest

A total of **945** complaints and information reports submitted by citizens, enterprises, and organizations were reviewed and resolved, achieving an overall resolution rate of **94.0** percent.

Of the complaints and information examined, violations involving **159** public officials were identified. **75** cases were assessed as potentially constituting criminal offenses and were referred to the competent investigative units.

Disciplinary measures were decided for **84** officials found to have committed violations.

With regard to timeliness, **94.7** percent of all complaints and information related to conflicts of interest were resolved within the statutory time limit, while **5.3** percent were resolved within an extended period permitted by law. No cases of overdue resolution were recorded during the reporting period.

Inspection and Review of Asset and Income Declarations of Public Officials

The asset and income declarations of 110 public officials were reviewed and resolved. As a result of the inspections, 29 public officials were held liable in accordance with anti-corruption legislation.

DISCIPLINARY MEASURES IMPOSED INCLUDED:



**REDUCTION
OF SALARY**
PERCENTAGES FOR
13 DECLARANTS



DEMOTION
FOR
10 DECLARANTS



**DISMISSAL
FROM
OFFICE FOR**
4 DECLARANTS



**OFFICIAL
WARNINGS**
ISSUED TO
2 DECLARANTS

Amounts Recovered through Inspection and Oversight Activities

In addition to imposing liability on responsible officials, inspection and oversight activities resulted in the recovery of damages incurred by certain organizations and individuals. As a result, losses amounting to **MNT 735,135,000 (USD 206,700)** were compensated by the officials at fault.

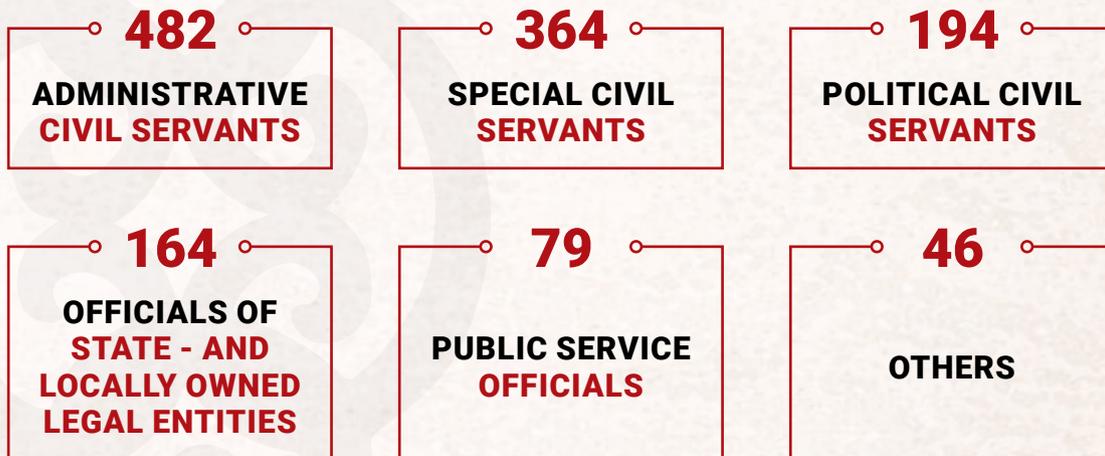
Furthermore, during the inspection of asset and income declarations circumstances indicating that **10** declarants may not have accurately reported the taxable income of their family members were identified. In accordance with Article **34** of the General Tax Law, information relating to **2** declarants was referred to the General Department of Taxation. As a result of the tax inspection, tax violations totaling **MNT 4,738,929,320 (USD 1.33 million)** were identified, and additional taxes, fines, and penalties amounting to **MNT 590,963,393 (USD 166,200)** were imposed.

INVESTIGATION

Complaints and reports on criminal offenses

In 2025, the Investigation Department reviewed a total of 1,847 complaints and reports concerning alleged criminal offenses. Of these, 463 complaints and reports were transferred to the competent authorities in accordance with applicable legislation.

THE CLASSIFICATION OF COMPLAINTS AND REPORTS BY CATEGORY OF PUBLIC OFFICIAL INVOLVED IS AS FOLLOWS:



Resolution of Criminal Cases

Within the legally prescribed jurisdiction, investigative and inquiry proceedings were conducted in **1,911** criminal cases, involving **2,259** criminal acts and **1,369** suspects. This represents an increase of **2.5** percent compared to the previous year.

Of the total cases examined, **367** cases were referred to the prosecutor with recommendations for transfer to court. The overall case resolution rate stood at **57.0** percent.

Criminal Cases

In 2025, investigative proceedings were conducted in **1,911** criminal cases involving **2,259** criminal acts and **1,369** suspects, representing a **2.5** percent increase compared to **1,863** cases investigated in 2024.

Of the total cases investigated:

**367 cases
(19.2%)**

were referred to the prosecutor with recommendations for transfer to court;



**543 cases
(28.4%)**

were submitted with recommendations for dismissal or closure;



**53 cases
(2.7%)**

were referred to the prosecutor with recommendations for transfer to court;



**88 cases
(4.6%)**

were consolidated;



**35 cases
(1.8%)**

were suspended.



When classified by articles of the Criminal Code, the cases subject to investigative proceedings are as follows:

1,419 cases (62.8%)

Article 22.1 (Abuse of power or official position)



237 cases (10.5%)

Article 22.4 (Receiving a bribe)



172 cases (7.6%)

Article 22.5 (Giving a bribe)



21 cases (0.9%)

Article 22.8 (Misuse of budget funds)



61 cases (2.7%)

Article 22.10 (Illicit enrichment)



43 cases (1.9%)

Article 22.12 (Abuse of power of a legal entity)



60 cases (2.7%)

Article 18.6 (Money laundering)



213 cases (9.4%)

Other offences



Criminal Cases Resolved by the Courts

In 2025, a total of **225** criminal cases were resolved by the courts, representing a **4.2** percent increase compared to the same period of the previous year.

Recovery of Damages from Corruption-Related Crimes

In 2025, criminal cases under investigation resulted in an estimated total damage of MNT **674.7** billion / USD **189.7** million/.

During investigative proceedings, MNT **163.1** billion /USD **45.9** million/ in damages was recovered, and immovable and movable property and cash valued at MNT **84.7** billion /USD **23.8** million/ were seized and secured.

IN ONE SENTENCE

- The National Audit Office concluded that the audit of the General Budget Governor's 2024 annual budget execution and consolidated financial statements was "without violations."
- Within the framework of the "Smart Government 2" project, the asset and income declaration submission system (meduuleg.iaac.mn) and the inspection system (iad.iaac.mn) have been fully upgraded, and preparations are underway to launch them into operation from 1 January 2026.
- To raise awareness of the harms of corruption and promote anti-corruption legislation, 51,746 declarants participated in 647 training sessions, representing a 13.9 percent increase compared to the previous year.
- In assessing the implementation of the Anti-Corruption Action Plan, the self-assessment average of 91 public institutions was 95.6 percent, while the average external assessment conducted by the IAAC was 66.6 percent.
- A risk-based analysis of declarations submitted by 45,630 public officials showed that officials from certain institutions recorded relatively higher average risk scores compared to others.
- By content, complaints and information related to conflicts of interest consisted of 24.8 percent granting undue advantages, 24.4 percent unlawful decisions involving conflicts of interest, 23.2 percent unlawful appointments, 18.4 percent abuse or excess of official authority, and 9.2 percent other issues.
- In accordance with the Criminal Procedure Law, 200 notices were issued to relevant legal entities to address causes and conditions contributing to crimes, of which 157 responses have been received.
- Of the 1,322 crime-related complaints and information subject to investigative activities, 194 involved political officials, 482 administrative officials, 364 special service officials, 79 public service officials, 164 officials of state- and locally owned legal entities, and 46 others.
- Of the 1,322 complaints and information reviewed through investigative activities, 688 (52.0 percent) originated from Ulaanbaatar, while 634 (48.0 percent) were from local areas.
- Of all cases examined, 19.2 percent (367 cases) were referred to prosecutors with recommendations for court transfer, 28.4 percent (543 cases) with recommendations to close or dismiss the case, 2.7 percent (53 cases) for transfer by jurisdiction, 4.6 percent (88 cases) were consolidated, 1.8 percent (35 cases) were suspended, and 825 criminal cases remain pending, including 783 inquiry cases and 42 investigation cases.
- Of the individuals investigated for corruption-related crimes, 8.5 percent were political officials, 17.8 percent administrative officials, 15.5 percent special service officials, 14.1 percent public service officials, 9.4 percent officials of state- and locally owned legal entities, and 34.7 percent other persons.
- Within the second phase of the "Institutional Integrity and Transparency of Mongolia (2024–2027)" project planned by the International Development Law Organization (IDLO), activities aimed at strengthening investigators' professional capacity in corruption investigation, financial investigations, asset, income and expenditure monitoring, mutual legal assistance, and enhancing public awareness on anti-corruption were planned, and the project launch event was held on 12 December 2025.