



**Which concrete steps would facilitate the
Implementation of the
UN Convention against Corruption
into national legislation in Bahrain?**

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1) Introduction

The Kingdom of Bahrain signed the United Nations Convention Against Corruption (UNCAC) on the 8th of February 2005. It has yet to be ratified before entering into force. It is important for the Kingdom of Bahrain to join the international community by ratifying the UNCAC and taking the responsibility to fight and prosecute serious crimes of corruption and prevent the crippling of the country's growth and stability. Bahrain, as a developing country with a relatively new experience in concepts of civil and political freedoms, equality, and development of human capabilities advocated by international law and enshrined in its 2002 Constitution, is in pressing need to fight corruption.

In its campaign to promote and support the country's ratification of the UNCAC, as for any essential international convention or treaty, civil society needs to assess the strategies required for implementation of the UNCAC by way of enacting national legal instruments and administrative measures. It has also to assess the facing challenges and obstacles that contribute to the Kingdom of Bahrain's further delay in the ratification of the UNCAC. This research paper aims to make such assessment.

First, it is useful to briefly outline the constitutional and legal mechanisms for Bahrain's ratification and effective implementation of the UNCAC.

2) Constitutional and legal considerations for Bahrain's adoption of the UNCAC

Article (37) of the Constitution of The Kingdom of Bahrain of 2002 states: "1) The King shall conclude treaties by Decree, and shall communicate them to the Consultative Council and the Chamber of Deputies forthwith accompanied by the appropriate statement. A treaty shall have the force of law once it has been concluded and ratified and published in the Official Gazette. (2) However, peace treaties and treaties of alliance, treaties relating to State territory, natural resources, rights of sovereignty, the public and private rights of citizens, treaties pertaining to commerce, shipping and residence, and treaties which involve the State Exchequer in non-budget expenditure or which entail amendment of the laws of Bahrain, must be promulgated by law to be valid. (3) Under no circumstances may a treaty include secret clauses which conflict with those openly declared."¹

Whereas the ratification of the UNCAC is required to be promulgated by law because it relates amongst other issues to State sovereignty, citizens' rights, expenditure of national budget, and amendment to the laws, it is mandatory to be passed by the National Assembly to ratify it by enactment of a law.

¹ The Constitution of The Kingdom of Bahrain (The Kingdom of Bahrain, 2002)

It is therefore important for the national coalition to direct its efforts towards involving members of both Chambers of the National Assembly (The Consultative Council and the Chamber of Deputies) together with the government in its campaign for ratification and implementation of the UNCAC.

It is worth mentioning that in accordance with the provisions of Bahrain's Constitution, international conventions are self-executing. It shall suffice for the National Assembly to pass the Convention and for the King to ratify it and promulgate it by law decree published in the Official Gazette for the provisions of the Convention to become a part of the national body of laws. The provisions of the Convention shall have precedence over national law in case of conflict. Still, national laws in force in the Kingdom of Bahrain relating to the provisions of the UNCAC will need to be amended and, where necessary, new laws for the implementation of its provisions will need to be made to ensure compliance with the standards set under the UNCAC.

This paper sheds light on the criminal offences linked to corruption as set out under the UNCAC on the extent to which they are covered under the laws currently in force in the Kingdom of Bahrain. Suggestions shall be made towards promoting and strengthening legislative and administrative measures to prevent and combat corruption more efficiently and effectively, which is the first and core purpose of the UNCAC².

3) Crimes of corruption and related offences under UNCAC and Bahrain Laws and Regulations

UNCAC does not give a specific definition of corruption but provides a comprehensive list of all acts that qualify as crimes of corruption or related offences. It includes crimes of corruption involving the private sector, natural and corporate persons, and public officials. Bahrain legislation does not define corruption as any one specific crime. Provisions on crimes of corruptions are found scattered in the general body of laws and in special laws. It is found primarily in the Bahrain Penal Code of 1976 as amended³, and in relatively recent laws against money-laundering⁴.

Below, texts from the provisions relating to crimes of corruption outlined under Chapter III of UNCAC shall be extracted to examine the extent to which Bahrain laws are compatible with the Convention's provisions.

² United Nations Convention Against Corruption (Article 1: Statement of Purpose).

³ Bahrain Penal Code promulgated by Amiri Decree No. 15 of 1976, as amended.

⁴ Bahrain Money Laundering Regulation issued by the Bahrain Monetary Agency on 14/10/2001.

1. Bribery as a criminal offence (Articles (15), (16), and (21) of UNCAC)

UNCAC qualifies bribery, committed by national public officials, foreign public officials, officials of public international organizations, and persons in the private sector, as a criminal offence.

UNCAC's definition of public officials is the same as Bahrain Penal Code's definition. Article (107) of the Bahrain Penal Code states a civil servant shall be defined as one of the following:

1. "Persons in a position of authority, staff of government ministries and local administrative units.
2. Persons in the armed forces and service.
3. Members of councils and public representative units whether elected by general ballot or appointed by Royal Order.
4. Persons nominated by a public authority to perform task(s) entrusted thereto.
5. Chairmen, members of boards of directors, managers, and all staff of public institutions and organizations.
6. Chairmen, members of boards of directors, managers, and all staff of units belonging to public institutions and organizations."

Article (108)⁵ identifies persons appointed by a public authority to perform task(s) of public service, as any persons not included in the preceding list who perform task(s) relating to public service by way of authorization issue from a public official acting within the scope of his/ her mandate under the laws and regulations.

Further, Bahrain's legislation does not differ from UNCAC qualifying acts giving rise to crimes of bribery by public officials. Articles (186- 193) of the Bahrain Penal Code outline all the crimes of bribery committed by public officials and those authorized to perform public service, and the prescribed punishments, reaching imprisonment for up to a period of ten years. In addition, Article (190) of the law punishes persons making any offer of bribery by imprisonment for up to a period of one year or by payment of a fine.

However, The Bahraini Penal Code needs to be amended to include crimes of bribery committed by officials in public international organizations. With the ongoing globalization and increase in the number of international organization, this is crucial to ensure a safe and legal environment for the international organizations in relation to the Kingdom of Bahrain.

The Bahraini Penal Code remains silent on bribery in the private sector. It can be implied however from texts governing "breach of trust". The Bahraini Penal Code needs to be amended to include crimes of bribery in the private sector. This is important in light of the highly increased role of the private sector in investment and economic growth.

⁵ Bahrain Penal Code promulgated by Amiri Decree No. 15 of 1976, as amended.

2. Crimes of embezzlement, misappropriation, or other diversion of property (Article (17) of the UNCAC)

Bahrain's legislation is in compliance with UNCAC in qualifying embezzlement, misappropriation, or other forms of diversion of property or any other possession entrusted to a public official by virtue of his/ her position as a criminal offence. Articles (194- 201) of the Bahraini Penal Code prohibit all acts of “embezzlement and misappropriation of funds”⁶ and impose strict penalties of imprisonment up to a life sentence, and/ or payment of a fine and the liability to return property and pay a fine equal to the value of the property acquired⁷.

3. Trading in influence as a criminal offence (Article (18) of the UNCAC)

Looking at the Bahraini Penal Code, Article (202) prohibits the use by public officials, or persons assigned to a public service, of their influence, whether real or supposed to provide an undue advantage of any kind. "Exploitation of office or influence"⁸ is punishable by a prison sentence of up to ten years.

4. Abuse of functions as a criminal offence (Article (19) of the UNCAC)

Article (203) of the Bahraini Penal Code provides for a prison sentence not exceeding ten years for any public official who commits a breach of his/ her duties with the aim to obtain an undue advantage for himself or another person. Articles (204-206) go further to outline other particular acts of abuse of function committed by a public official for the purpose of obtaining an undue advantage for himself or another person.

5. Illicit enrichment as a criminal offence (Article (20) of the UNCAC)

The Shura Council is considering a Draft Bill for Financial Integrity Law⁹ that considers illicit enrichment to be a particular criminal offence. The Draft has been passed by the Chamber of Deputies, but it remains questionable whether it will be passed by the Shura Council. The purpose of the law is to require public officials, or persons assigned to a public service to disclose their income and properties as well as their direct family's income and properties. Accordingly they may be charged in case they fail to provide reasonable justification for their enrichment. Illicit enrichment can lead to a prison sentence for a minimum of five years and payment of a fine. In addition, the properties shall be confiscated and the offender shall be removed from his/ her position¹⁰.

⁶ Bahrain Penal Code promulgated by Amiri Decree No. 15 of 1976 (Chapter II).

⁷ Bahrain Penal Code promulgated by Amiri Decree No. 15 of 1976 (Article 201).

⁸ Bahrain Penal Code promulgated by Amiri Decree No. 15 of 1976 (Chapter III).

⁹ www.shura.gov (www.shura.gov.bh/default.asp?action=categoryandid=288)

¹⁰ (www.shura.gov.bh/default.asp?action=categoryandid=288) (Bahrain Shura Council, 02/07/2006)

6. Embezzlement of property in the private sector as a criminal offence (Article (22) of the UNCAC)

There is no text in the Bahraini laws that defines or criminalizes acts of embezzlement in the private sector as required in the UNCAC. However, description of this crime is intertwined with the standard crimes of theft and breach of trust.

7. Laundering of proceeds of crimes as a criminal offence (Article (23) of the UNCAC)

Bahrain places great importance on the growth and development of its financial sector. Therefore, it has adopted legislative measures to prevent money laundering¹¹. The Ministry of Industry and Commerce also aims to raise awareness to comply with anti-money laundering legislation and mechanisms for reporting suspicious transactions amongst non-financial businesses operative in Bahrain¹².

Article (1) of the Law¹³ defines general "criminal activity" that results in offence of money-laundering as "any activity which is a crime whether in the State of Bahrain or in any other State" and defines "property" to be "property of every kind, nature and description, whether movable or immovable, tangible or intangible..." Thus, the Law with Respect to the Prevention and Prohibition of Laundering Money is capable to include all acts that are crimes under the Bahraini Penal Code and other laws and regulations that constitute crimes of corruption, as well as other acts under UNCAC that are criminalized under the laws of other States.

Article (2)¹⁴ of this law criminalizes all acts that result in legitimization of any proceeds of crime. Thus it is in compliance with the UNCAC requirement that the State Party has expanded law to cover money laundering and give effect to the Article. It is in agreement with the UNCAC range of criminal offences established, committed within and outside the jurisdiction of the State Party.

8. Concealment as a criminal offence (Article (24) of the UNCAC)

The Bahraini Penal Code criminalizes concealment of proceeds of crime under Article (398). It does not provide any definition to the act(s) giving rise to criminal offence of concealment. But Article (398) goes further to provide that where the offender has no knowledge that the property is a proceed of crime, but has retained it under circumstances that would lead an ordinary person to believe that such property is from an illegitimate source, he shall be liable for imprisonment for a period not exceeding six months and the payment of a nominal fine¹⁵.

¹¹ Decree Law No. (4) Of 2001 With Respect to the Prevention and Prohibition of the Laundering of Money.

¹² Ministry of Commerce Infrastructure Support Publication "Anti-Money Laundering Guidelines" (Kingdom of Bahrain, 2003).

¹³ Decree Law No. (4) Of 2001 With Respect to the Prevention and Prohibition of Laundering of Money.

¹⁴ Decree Law No. (4) Of 2001 With Respect to the Prevention and Prohibition of Laundering of Money.

¹⁵ Bahrain Penal Code of 1976, (Article 398).

9. Obstruction of justice as a criminal offence. (Article (25) of the UNCAC)

Bahraini legislation¹⁶ criminalizes obstruction of justice notwithstanding the motives of the offender. In compliance with UNCAC Article (25) Subsection (a), Articles (232) and (238) of the Bahraini Penal Code criminalize all such acts, whether by the using physical force, violence, or any threat thereof, or by giving, offering, or promising any undue advantage to interfere with the giving of testimony or production of evidence.

In compliance with UNCAC Article (25) Subsection (b), Article (211) of the Bahraini Penal Code provides that any public officials who in any way interferes or delays the commission of offences, or any judgment or verdict passed by the court or regulatory public authority.

As outlined above, Bahraini legislation provides for many isolated criminal offences that correspond to crimes of corruption under UNCAC. However, the provisions are in no way a substitute for the Convention provisions. The Convention deals with crimes of corruption in more detail in relation to both the wrongdoings and the wrongdoers. It provides a framework for decreasing such offences as well as tracking, exposing, and prosecuting these criminal offences.

10. Liability of legal persons. (Article (26) of the UNCAC)

UNCAC provisions also apply to legal persons guilty of corruption offences. Thus the application of the relevant Convention provisions is not limited to national public officials. It encompasses foreign public officials, officials of international organizations, and officials in the private sector.

In addition, Article (26) of UNCAC requires States Parties to implement effective, proportionate and dissuasive criminal or non-criminal sanctions. Many corruption offences and related criminal offences are committed through organizations and companies enjoying a separate corporate legal personality. This is verified among other instances in cases of money laundering and crimes of concealment. It is necessary to sanction legally such situations and take preventative steps by raising awareness.

The Bahraini Penal Code provisions apply only to natural persons and do not cover corporate entities guilty of corruption offences. However, the more recent anti-money laundering law provides in Article (3.3) for liability of corporate body by punishment of a fine of BHD 50,000.00 (USD 132,626.00)¹⁷ in addition to confiscation of the property which is the subject matter of the offence. This corporate liability does not leave out the responsibility of natural persons within the company fraudulently involved. From this perspective, it is necessary to amend the laws relating to crimes of corruption to include acts of corruption in the private sector and the sanctioning of corporate persons beyond money laundering in accordance with UNCAC.

¹⁶ Bahrain Penal Code of 1976, (Part IV: Crimes of obstruction of judicial proceedings, Articles 230-256)

¹⁷ At the exchange rate of 2.6525 (06/10/2006)

11. Measures of freezing, seizure, and confiscation of property. (Article (31) of the UNCAC)

The UNCAC places great emphasis on the need to pass laws enabling the identification, tracing, freezing, seizure, and confiscation of property derived from a crime of corruption.

The Bahraini legislation also accounts for that provision. For example, Article (192) of the Bahrain Penal Code provides for the “confiscation of any gift received by the public official or person authorized to carry out public service...” and Article (201) adds that the punishment shall include the "...return of equivalent value of the property which is the subject of embezzlement and misappropriation or any other property..." Regarding the offence of money laundering, Article (3.2) of the Anti-Money Laundering Law provides for the "(...) confiscation of the property which is the subject matter of the offence, or any other property owned by him or by his spouse or his children, equivalent in value to the property which is the subject matter of the offence." This punishment applies even where criminal prosecution ends because of death of the offender, unless his inheritors can prove the legitimacy of the property.

However, the provisions laid out by Article (31) of the Convention deal with further issues that would serve the procedure of tracing, freezing, seizure, and confiscation of the property by requiring States Parties to empower its courts and authorities to order that bank, financial or commercial records be made available or seized and preventing States Parties from declining to do so on the ground of bank secrecy. This is stressed upon in Article (40) of the Convention. Furthermore, Article (53) requires States Parties to provide for legal means which enable them to confiscate any property gained due to offences amounting to corruption. And Article (54) provides for mechanisms for recovery of property through international cooperation in the area of confiscation.

The above referred Articles of the UNCAC, amongst others, demonstrate that the Convention has turned the responsibility of fighting corruption for each State into a responsibility for the international community. Criminalizing acts of corruption in national State legislation is not sufficient. Looking at the devastating results of corruption, the responsibility on an international level is crucial and the Kingdom of Bahrain ought to take on its share of responsibility in the international community effort in fighting corruption. Such commitment towards the international community can only materialize through ratification of the UNCAC.

4) Mechanisms for the prevention and prosecution of criminal offences of corruption

Success in applying UNCAC provisions lies in the provision of adequate and effective sanctions for crimes of corruption and related offences. Although most of the criminalized acts under UNCAC are unlawful in domestic legislation the latter does not succeed in fulfilling its purpose in many instances. Corruption is still widespread and

offenders continue to elude justice. Aside from many political and legal factors, a contributory factor is the absence of real democracy due to lack of true separation of the powers. The executive power is dominant at the expense of the legislative and the judicial powers. Under Article (32) of the Bahrain Constitution, the legislative authority is vested in the King and the National Assembly in accordance with the Constitution and judicial rulings are made in his name. Thus, according to the Economist Intelligence Unit, the King is the "ultimate arbiter"¹⁸. The King may amend the Constitution¹⁹ and has the power to appoint judges, and members of the Higher Judicial Council and the Constitutional Court.

Bahrain has a comprehensive Penal Code and other laws that govern crimes of corruption in place. Further, The National Charter of Action of 14/02/2001 provides for the establishment of public accountability committees to ensure the State's financial and administrative transparency, the return of parliamentary life, and the abrogation of State security laws. Further, his Majesty the King Hamad Bin Isa Al-Khalifa declared a general amnesty that led to the release of political prisoners, the return of exiles, and the legalization of political associations. The above reforms are not sufficient as such to put an end to corruption and to prosecute serious criminal offences of corruption and related criminal offences.

The extension of blanket amnesty to include all crimes perpetrated by public officials against prisoners, exiles, and other citizens has not helped to establish an environment conducive for fighting corruption.

Furthermore, the role of the Chamber of Deputies in some issues where corruption is rooted has been less than the minimum required. Article (65) of the Constitution provides "(...) any Minister may be questioned on matters coming within his sphere of competence" by the Chamber of Deputies. And Article (66), Subsection (a) provides that each Minister shall be responsible to the Chamber of Deputies for the business of his Ministry. Therefore, the matter of confidence in Ministers may be put to the Chamber of Deputies in accordance with the provisions of Article (66) of the Constitution titled "Responsibility, Vote of No-Confidence".

However, on 30/05/2006 the Chamber of Deputies voted to change the questioning of Ministers from public to closed questioning in private committees²⁰. This evidently goes against principles of State's real transparency²¹.

Furthermore, pending files are left unresolved and at times are closed without any clear reason. The same applies to some files that were handled by the Chamber of Deputies under the pressure of the civil societies in the Kingdom of Bahrain. By way of example, it is worth considering the scandal of abuse of administrative and financial powers by theft of pensions at the General Organization for Social Insurance ("GOSI"). The investigation

¹⁸ The Wall Street Journal "2006 Index of Economic Freedom", Bahrain

¹⁹ The Constitution of the Kingdom of Bahrain (Bahrain, 2002) (Article 35(a))

²⁰ Ali Al-Iliwat "...Investigation of Minister in the "Dark"" Al Wasat Newspaper (Bahrain, 31/05/2006).

²¹ Ali Al-Iliwat "Insisting on Closed Questioning of Ministers" Al Wasat Newspaper (Bahrain, 07/06/2006)

was eventually resolved by the Chamber of Deputies but all officials remained in their posts. Another important issue relates to the acquisition of lands in Bahrain other than under the law.

A recent example at the date of writing this Paper that is of great magnitude, is the report prepared by Dr. Salah Al-Bander, the Secretary-General of the Gulf Centre for Democratic Development ("GCDD"). The Public Prosecution Office investigated with Dr. Salah Al-Bander on 12/09/2006 and he was subsequently deported to the UK on the same night without trial and accused to cause public dissent and to tarnish the image of the government of Bahrain²². The report alleges dangerous acts of corruption perpetrated by named powerful officials and contains supporting documentation²³. The High Criminal Court of Bahrain issued a judgment on 04/10/2006 to prevent the publication of any news, comments, or information relating to Dr. Al-Bander's report²⁴. This issue needs to be thoroughly investigated, and thus the ruling to prevent publication of any information and the government censorship of this issue is highly criticized.

The Law with Respect to Organization of Tenders and Government Purchases²⁵ organizes the operation of tenders and purchases for products, constructions, and services. Article (2) Subsection (a) provides the Law aims to protect public property from acts of corruption and Subsection (d) provides the Law aims to achieve transparency in all the stages in the procedure of government purchases. Still, according to the US Department of Commerce "...there is still occasional high-level corruption in contract bidding and the management of successful investments."²⁶ Thus, the importance does not solely lie in having a law in place, but it lies in taking effective legal and administrative mechanisms to enforce the provisions of the law and fight the crimes of corruption and related offences.

5) Proposed steps to facilitate the implementation of the UNCAC provisions into national legislation

Corruption is a complex phenomenon and has the ability to appear in all aspects of life. An international strategy is required and there must be a common understanding of the various forms of corruption, its reasons, and how to detect it upon its occurrence. Action must be taken to minimize the chances or circumstances that may lead to its existence or give its perpetrators immunity, protection, or legitimacy and tolerance from the community and the law. Thus, comprehensive deterring sanctions should be put in place.

Fighting corruption requires political will and public awareness. The community plays a significant role in monitoring and supporting the political leadership in its mission. Therefore it is vital to educate the public on the nature of the acts that amount to criminal

²² Al Waqt Newspaper, www.alwaqt.com (Bahrain 14/09/2006)

²³ Kanwal Hameed "BanderGate: "Unanswered Questions" Gulf Daily News (Bahrain, 27/09/2006).

²⁴ "Prevention of Publication in Al Bander Matter", Al Waqt Newspaper (Bahrain 05/10/2006).

²⁵ The Legislative Decree No (36) For 2002 With Respect to Organization of Tenders and Government Purchases.

²⁶ The Wall Street Journal "2006 Index of Economic Freedoms", Bahrain.

offences of corruption or criminal offences related to corruption. And to further educate it on the laws and administrative measures to fight acts of corruption. Thus, it is essential for the civil societies to take proactive initiatives and promote UNCAC and to have a community that is knowledgeable on crimes of corruption and is perseverant to prosecute offenders, be it natural persons or corporate entities. The civil societies should encourage the full translation of the provisions into national legislation and administrative measures and grasp in full, the amendments required to the present body of laws and regulations to bring it up to the standards of UNCAC.

In conclusion fighting corruption requires the existence of a suitable legal, political, and social environment. It is imperative for that environment to feed on the following:

- The clear definition of all unlawful acts that constitute crimes of corruption and crimes related to corruption.
- The enforcement of true principles of democracy, rule of law, transparency and the separation of legislative, executive, and judicial authorities.
- The enhancement of the role of the National Assembly elected Chamber of Deputies in relation to publicity of information and investigation of abusive conduct, for holding Ministers and the Government accountable.
- The creation of an independent judicial body (judges, courts, public prosecution, experts, arbitrators...) specialized in crimes of corruptions and crimes related to corruption with the authority to issue and execute judgments thereof.
- The setting-up of a national coalition to promote and support Bahrain's ratification of UNCAC and other international or regional treaties and conventions aimed at fighting corruption and related offences. The coalition shall aim to push forth for the amendment of the laws and regulations and the harmonization of the laws and regulations with the standards required under the conventions or treaties.
- The enhancement of the role of existing supervisory and regulatory authorities and institutions such as the Central Bank of Bahrain and establishment of new supervisory and regulatory authorities to ensure Bahrain's financial and administrative transparency.
- The enhancement of the "watchdog" role of the civil societies and the media as key actors in the fight against corruption within Bahrain and raising public awareness.

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