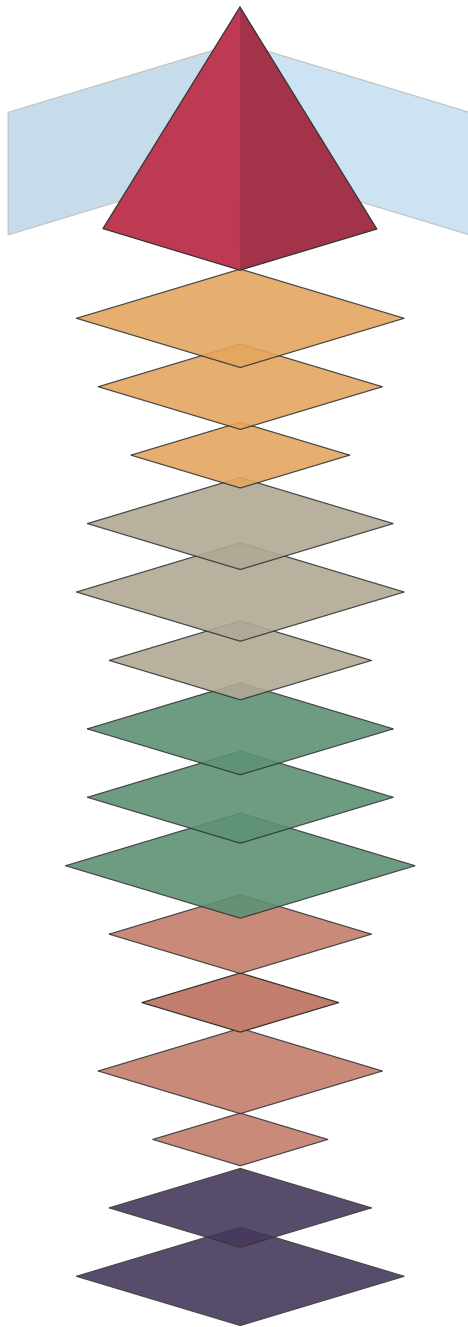




# UGANDA



## 6.55 CRIMINALITY SCORE

29<sup>th</sup> of 193 countries  
7<sup>th</sup> of 54 African countries  
2<sup>nd</sup> of 9 East African countries



### CRIMINAL MARKETS 6.40

HUMAN TRAFFICKING	7.50
HUMAN SMUGGLING	6.50
EXTORTION & PROTECTION RACKETEERING	5.00
ARMS TRAFFICKING	7.00
TRADE IN COUNTERFEIT GOODS	7.50
ILLICIT TRADE IN EXCISABLE GOODS	6.00
FLORA CRIMES	7.00
FAUNA CRIMES	7.00
NON-RENEWABLE RESOURCE CRIMES	8.00
HEROIN TRADE	6.00
COCAINE TRADE	4.50
CANNABIS TRADE	6.50
SYNTHETIC DRUG TRADE	4.00
CYBER-DEPENDENT CRIMES	6.00
FINANCIAL CRIMES	7.50



### CRIMINAL ACTORS 6.70

MAFIA-STYLE GROUPS	5.50
CRIMINAL NETWORKS	6.50
STATE-EMBEDDED ACTORS	8.00
FOREIGN ACTORS	7.00
PRIVATE SECTOR ACTORS	6.50



## 3.88 RESILIENCE SCORE



Funding provided by the United States Government.

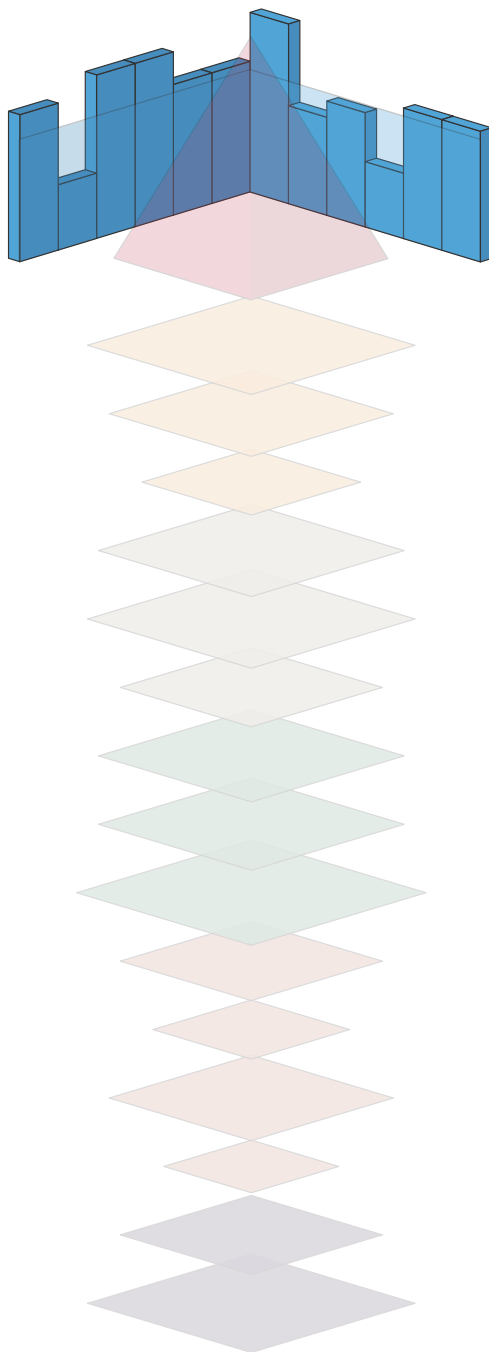


Funded by the European Union

ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.



# UGANDA



3.88

## RESILIENCE SCORE

138<sup>th</sup> of 193 countries  
27<sup>th</sup> of 54 African countries  
5<sup>th</sup> of 9 East African countries

POLITICAL LEADERSHIP AND GOVERNANCE	4.50
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	2.00
INTERNATIONAL COOPERATION	5.00
NATIONAL POLICIES AND LAWS	5.00
JUDICIAL SYSTEM AND DETENTION	4.00
LAW ENFORCEMENT	4.00
TERRITORIAL INTEGRITY	5.50
ANTI-MONEY LAUNDERING	3.00
ECONOMIC REGULATORY CAPACITY	3.50
VICTIM AND WITNESS SUPPORT	2.00
PREVENTION	4.00
NON-STATE ACTORS	4.00



6.55

## CRIMINALITY SCORE



CRIMINAL MARKETS **6.40**



CRIMINAL ACTORS **6.70**



Funding provided by the United States Government.



Funded by the European Union

ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

# CRIMINALITY

## CRIMINAL MARKETS

### PEOPLE

Uganda is an origin, transit and destination country for human trafficking, primarily for forced labour and sexual exploitation. Most adult victims are subjected to domestic servitude or forced labour in various sectors, including agriculture, fishing, forestry, mining and street vending, and are often trafficked to the Middle East or other parts of East Africa. Fake recruitment agencies render migrants more vulnerable to human trafficking. Women and young girls are the most vulnerable to transnational trafficking, with many of them being fraudulently recruited for employment before being exploited through sex trafficking. Children in Uganda are also vulnerable, with child traffickers often subjecting them to prostitution and forced begging. Child traffickers are often individuals from transport or recruitment agencies, bar owners, rebels or strangers that steal children from their families. Traffickers also compel some children from the Democratic Republic of the Congo (DRC), Rwanda, Burundi, Kenya, Tanzania and South Sudan into forced agricultural and sex trafficking in Uganda. The financial struggles of care givers increased the vulnerability of children to human trafficking. Currently, the easing of COVID-19 restrictions and free cross-border human flow (for both the criminals and victims) is fueling the crime.

Uganda serves as a source, transit and, to a lesser extent, destination country for men, women and children. Human smuggling within Uganda is more prevalent than transnational smuggling and the majority of victims are children. The country's strategic location and high levels of state corruption make it a safe haven for smugglers, with many internationally wanted smugglers based in the country. While most labour migration recruitment agencies are legitimate and subject to government oversight, many cooperate with migrant smuggling networks and engage in document falsification, bribery or other criminal acts. Uganda is one of the largest refugee hosting nations in Africa and, with international borders opening up, smuggling is increasing. Extortion and protection racketeering are also prevalent in Uganda. Outside of Kampala, gangs known as 'iron bar gangs', periodically extort businesses, residents and visitors. Although cases are widespread, most of them are not linked to organized crime.

### TRADE

Uganda has become a hub for arms trafficking across East, Central and West Africa, with one of the highest rates of gun violence in the region. Historical conflicts with neighbouring countries, such as Tanzania, the DRC, South

Sudan and Kenya, have contributed to the problem, with large numbers of weapons remaining in civilian possession. While licenses are required to acquire and possess firearms, illegal gun ownership is widespread, with the government struggling to secure its own stock of weapons. Small arms trafficking thrives alongside cross-border cattle theft, with inter-ethnic conflict between farmers and pastoralists in northern Uganda posing a major challenge to disarmament. Ethnic connections between pastoral groups across borders also facilitate cross-border arms trafficking. Ammunition and small arms manufacturers also operate domestically and obtain trafficked supplies from Somali and Congolese militias. However, most illegal guns are imported from Russia, the US or Ukraine. Despite being a regional arms trafficking hub, Uganda has taken measures to address the problem, such as an amnesty programme and voluntary surrender of arms, as well as awareness-raising campaigns in the media. Arms trafficking is believed to have increased over the last two years due to the growing influence of the Allied Democratic Forces-National Army for the Liberation of Uganda (ADF-NALU).

Uganda is a hub for counterfeit goods, and this is a huge burden on the country's economic growth. Uganda's borders with Kenya make it a hotspot for counterfeit goods trading. The authorities admit that counterfeiters are taking advantage of the inadequate surveillance, due to limited resources, to monitor the country's borders. Counterfeit drugs, particularly fake anti-malarial medicine, are rampant, with over a third of drugs sold being fake. The lack of intellectual property rights legislation in Uganda feeds a vast black market for smuggled and counterfeit goods. Uganda has also experienced illicit trading in excise goods, particularly cigarettes. Illicit cigarette trading accounted for almost one quarter of the Ugandan cigarette market. More than a half of illicit cigarettes are produced locally, while the rest are smuggled from neighbouring countries.

### ENVIRONMENT

Uganda remains a key source for charcoal and timber destined for Kenya and the international market. The charcoal business has become a magnet to transnational organized crime because it remains unregulated and unrestricted. Ineffective law enforcement coupled with corruption along borders allows Ugandan and DRC timber to cross into Kenya, with some of it onward to Middle East and Asian markets. At least one third of the timber production in Uganda is illegal, leading to a loss in taxes and hundreds of thousands of hectares of forests lost annually. Illegal tree felling for charcoal is exacerbated by a moratorium imposed on logging in neighbouring Kenya. Uganda currently supplies more than one half of Kenya's charcoal, despite a ban on the charcoal trade. As a transit

country, more than two thirds of illegal timber originating in the DRC, and destined for other markets in East Africa, crosses Uganda. Both national and foreign criminals involved in the illicit charcoal trade simultaneously engage in gold and ivory smuggling. Wildlife trafficking syndicates are known to conceal contraband destined for international markets in illicit timber entering Uganda from neighbouring countries such as South Sudan and the DRC. Locals from poor communities, brokers who purchase timber, and corrupt authorities alike, profit from this.

Uganda is also a notable transit hub for wildlife trafficking, particularly for ivory, rhino horn and pangolin. Entebbe airport is a known hub for wildlife smuggling, due to high levels of corruption. Corruption in the judiciary system also fosters impunity for these crimes. Most wildlife products from the region are destined for China or elsewhere in Asia, the Middle East or Kenya and Tanzania for re-export. The traditional medicine and exotic pet trades also pose a considerable risk to endangered species, such as reptiles and birds. Poaching of lions and chimpanzees also occurs. Uganda is among the top-ten most prominent transit hubs for ivory in both East and Central Africa, as it is for pangolin trafficking.

Uganda's natural resource industry, particularly gold, has seen a significant rise in illegal activity in recent years. Despite limited mining activity and few domestic reserves, gold has become Uganda's most important export product, as high volumes enter the country to be refined. Discrepancies between the volumes of gold produced domestically and exported suggest widespread illegality, with the gold often being flown to the UAE to be mixed with legally sourced gold. Corruption and patronage play a role in mining licenses being granted, and criminal syndicates comprising Ugandan, Congolese and Kenyan criminals smuggle gold into Uganda from neighbouring DRC and South Sudan. The Ugandan military and armed groups are also involved in these smuggling activities. Illicit sand mining occurs in rural districts around Lake Victoria by state-embedded actors, state-affiliated institutions and powerful individuals with political connections. Sand mining cartels pose as investment agencies and sell shipments of illegally mined sand through established black markets, primarily for use in mega infrastructure projects in Africa and globally.

## DRUGS

Uganda is a transit country and a destination for drug smugglers, particularly for heroin and cocaine. Heroin primarily enters the country via drug mules or building materials, having been trafficked from Pakistan, Afghanistan and India through Kenya or Tanzania. Drug barons recruit youths as couriers once the drugs enter the country. Porous borders, weak security systems and rampant corruption exacerbate the issue of drug trafficking. Heroin consumption is primarily among urban street youths; this, in turn, contributes to petty crime. While the punishment for drug

trafficking can be up to decades in prison, in practice, this rarely occurs. With the easing of COVID-19 restrictions, the market has expanded, with both demand and supply flourishing. Criminals have cashed in on international trade to rebuild their pandemic-battered economies. The illicit drug trade in Uganda is controlled by foreign nationals, but the transnational trade easily compromises key institutions such as law enforcement agencies, and customs and immigration departments.

The domestic cocaine market in Uganda is expanding, with powder and crack cocaine consumption on the rise. Although Uganda does not play a prominent role in the regional cocaine market, it serves as a transit country for overland cocaine trafficking to larger consumer destinations such as Kenya, and for cocaine trafficked out of Kenya and Tanzania to Europe. Entebbe airport has become a significant node in the transit of illicit drugs from African transit points to European and other international destination markets. The cocaine and heroin trades in Uganda are fueled by the country's weak security systems, high border porosity and rampant levels of corruption. There have been cases of suspected drug traffickers vanishing from custody.

Uganda is recognized as a considerable cannabis exporter in the region, with cultivation occurring in several districts throughout the country. It is also a transit country for cannabis trafficked to southern and western African destinations and a destination country for the regional market. Since the approval of cannabis exports for medicinal purposes, companies have acquired licenses for the drug's cultivation. However, allegations of military involvement in cultivating and trafficking DRC cannabis across the border persist, and some originating in the DRC has been mistaken for Ugandan cannabis when transiting the country.

On the other hand, Uganda serves primarily as a transit country for synthetic drugs, including methamphetamine and ephedrine, which are too expensive for the local drug market. Most criminals involved in the synthetic drug market operate from Kenya, utilizing Ugandans as drug couriers. Other synthetic drugs detected in Uganda include synthetic opioids such as pethidine, entonox, fentanyl and morphine. Methamphetamines are also reportedly sold while transiting through Entebbe airport to Cameroon or India. Despite the small size of Uganda's synthetic drug trade, the country remains a potential transit point for drug trafficking due to its location and relatively lax law enforcement.

## CYBER-DEPENDENT CRIMES

The most common cyber-dependent crimes in Uganda are unauthorized access to computer systems, the exploitation of new tele-working infrastructures, and malware distribution. It has been reported that start-up companies are often victims of cybercrime originating from insider threats. These often go unreported, or their financial impact is

not assessed, since law enforcement agencies do not investigate most of them.

## FINANCIAL CRIMES

Key Ugandan government agencies lose billions of US dollars to corruption and financial crimes annually, as well as hundreds of millions lost in fraudulent procurement deals. Cyberfraud has also been flagged as a concern as billions of Ugandan shillings were lost in 2021. Tax evasion in the country has been described as 'massive', with millions of people evading taxes according to authorities.

## CRIMINAL ACTORS

High-level Ugandan officials have been implicated in organized crime, and the country's presidential elections are allegedly influenced by vote-buying and security services suppressing opposition activities. State-embedded actors control Uganda's non-renewable resource crimes market, and police, customs and judiciary officials accept bribes in cases related to drugs, flora and fauna crime. Uganda's military is highly involved in organized crime, with military officials reportedly facilitating the smuggling of illicit goods throughout the region. Racketeering also occurs within revenue authorities and land registries.

Uganda is also a magnet for foreign criminal actors due to widespread corruption, which eases the conduct of illicit business. This is further exacerbated by the country's proximity to Kenya's well-developed transport system and financial market. Various Ugandan politicians are allegedly bankrolled by foreign criminals seeking favours. Many organized criminal groups are multi-national, comprising both Ugandans and East Africans. Conversely, West Africans have been involved in kidnapping incidents and play an important role in the ivory/pangolin, drugs and minerals trade. Uganda's pangolin scale and ivory trafficking markets are also linked to Chinese and Vietnamese criminals. Indian criminals also engage in kidnapping other Indian

nationals in Uganda, often on the pretext of securing work for them abroad.

Criminal networks in Uganda operate across all criminal markets, thanks to rampant corruption and an abundance of resources. These networks are involved in small-scale precious metal mining, cattle rustling, diamond smuggling, uranium smuggling, human smuggling, ivory trafficking, timber smuggling, arms trafficking, cocaine trafficking, counterfeiting and other crimes. These criminal networks are facilitated by influential individuals with links to corrupt public and private sector officials.

The private sector is closely intertwined with politics, and corruption is central to its advancement. The revenue from illicit gold from the DRC and illicitly obtained South Sudanese oil and timber is laundered through the Ugandan banking system. Pastors, imams and local leaders at churches and mosques in Uganda have also assisted in the recruitment of domestic workers destined for abroad, mostly for Middle Eastern countries.

The ADF-NALU – which is based along the Ugandan-Congolese border in North Kivu in the east of the DRC – can be considered the most important mafia-style group in the country, although al-Shabaab is also present. These groups are involved in illicit gold mining, wildlife trafficking, timber smuggling and precious metal mining between Uganda and the DRC. They are also known to abduct children to serve as both child soldiers and wives. Moreover, recent suicide bombings and other violent attacks in Uganda have been attributed to the Allied Democratic Forces (ADF) and ISIS. It is difficult to distinguish between local groups and their alliances with other groups and organizations, making it challenging for authorities to curb their criminal activities. There are also more than a dozen lethal organized criminal gangs operating in Uganda, primarily in Kampala, engaging in kidnapping, murder, robbery, rape, various forms of trafficking, and home invasions. Gang members are also known to disguise themselves as taxi drivers throughout Kampala, so as to lure and kidnap victims.

# RESILIENCE

## LEADERSHIP AND GOVERNANCE

Uganda faces significant challenges in addressing organized crime due to a lack of implementation and law enforcement. The state, security and ruling party institutions have become so intertwined that the separation of powers is de-facto suspended. A bloated administration, costly system of patronage and corruption, as well as inconsistent policy implementation have weakened Uganda's otherwise

favourable economic prospects. Moreover, the grand-scale theft of public funds, often through the diversion of foreign aid and other resources towards corrupt officials, exacerbates already-existing issues regarding political patronage. A lack of transparency regarding government transactions also engenders corruption in the public procurement process. Corruption runs rampant in Uganda. Although most of it takes place among mid-level or low-level officials, several high-level Ugandan officials have also been

accused of being corrupt. As a highly militarized country, the Ugandan government is intolerant towards dissent and, even though it appears transparent and accountable on paper, in practice it is highly aggressive towards both media and opposition groups. Corruption runs especially high among police and judiciary officials, as well as in the public procurement sector where bribery and illicit payments are commonplace. Despite the existence of anti-corruption institutions, efforts are hindered by a lack of political will. Moreover, these institutions are understaffed, underfinanced and lack the capacity to effectively enforce anti-corruption legislation.

The Ugandan government has signed most of the international treaties and conventions relating to organized crime (except for the Arms Trade Treaty) and has extradition agreements with all the members of the Commonwealth. Uganda is also a member of the East Africa Community and has bilateral labour agreements with Saudi Arabia and Jordan, established in response to complaints regarding abuse towards Ugandan workers in the Middle East. The Ugandan government also expressed interest in expanding bilateral relations with other destination countries for its people, although enforcement remains a key challenge. Uganda has a powerful legislative framework against transnational organized crime, generated largely due to its long history of armed conflict, child kidnappings and abductions. However, implementation is lacking.

## CRIMINAL JUSTICE AND SECURITY

Uganda's judicial system faces multiple challenges, including a lack of independence, inadequate human resources, and corruption, with judges often accepting bribes in return for favourable judicial decisions. Many individuals in Uganda resort to other means to seek recourse for criminal acts due to widespread distrust towards formal justice institutions. The justice system allegedly favours criminals, including terrorists, at the expense of law enforcement. In general, the courts focus on sanctioning lower-level actors. The judiciary operates under poor infrastructural conditions, with judgments often delayed due to corruption. Uganda's prisons are overcrowded, underfunded and lack basic hygiene. Prisoners also lack basic rights.

Ugandan law enforcement officials are also corrupt, and both bribery and impunity are commonplace. Corruption among police is largely driven by institutional underfunding and low salaries for police officials. Despite known involvement in organized crime, police officials rarely face investigation, substantially hindering law enforcement capacity. There has been a strong militarization of law enforcement, including the appointment of military officials to various positions and fields. Many Ugandan law enforcement officials amass illegitimate wealth, with Ugandan law not allowing non-conviction-based asset recoveries. Additionally, human rights abuses and violence against opposition party

supporters were attributed to security forces during the last elections.

Uganda's borders are highly porous, providing opportunities for organized crime to flourish, including the trafficking of illicit timber, gold, minerals and drugs. Inadequate legislation, ineffective surveillance and screening procedures along the borders hinder the fight against organized crime. As such, individuals often bypass official border-crossing points to avoid formalities, long waiting times, surveillance measures and ad hoc taxation. Rebel groups and terrorist organizations operating in South Sudan and the DRC pose a notable threat to Uganda's territorial integrity. Currently, the Ugandan and Rwandan governments have been accusing each other of intervening in each other's affairs – high-profile Ugandan officials are suspected to have been murdered by Rwandan forces, while the Ugandan government is suspected to support Rwandan rebel groups. In relation to the DRC, the Ugandan army has intercepted and killed suspected ADF rebels crossing the border. The dispute between Kenya and Uganda regarding Migingo Island in Lake Victoria persists.

## ECONOMIC AND FINANCIAL ENVIRONMENT

The informal, cash-based economy in Uganda makes it an attractive environment for money laundering, with most of the money coming from domestic sources that are often linked to corruption. Real estate and casino operations are a concern. Uganda's inability to monitor formal and informal financial transactions, particularly informal trade along porous borders, could render it vulnerable to more advanced money laundering activities and potential terrorist financing. Uganda's anti-money laundering mechanisms are relatively new, rendering implementation an ongoing challenge. Administrative sanctions for money laundering offences remain extremely low, and many high-profile cases have stalled or been dropped due to a lack of evidence. Uganda remains grey-listed in anti-money laundering-related matters due to capacity issues and high financial integrity risks. Uganda has also been listed as one of four African countries posing financial risks to the European Union due to anti-money laundering and terrorism financing shortfalls.

Corruption also runs rampant among Ugandan land administration officials, with transparency in the land registry severely lacking, making land disputes common. Businesses engaged in natural resource trading are easily able to circumvent laws regarding the origin of goods, implicating legitimate private companies in criminal activity. A lack of transparency also renders businesses vulnerable when bidding for public contracts, with procurement officers often demanding bribes. The COVID-19 pandemic caused considerable economic disruptions, with a severe deceleration in growth in the real estate and information technology sectors. Nonetheless, economic growth is projected for the coming years.

## CIVIL SOCIETY AND SOCIAL PROTECTION

The role of non-state actors in victim support in Uganda is significant. NGOs provide care and advocate for the rights of drug users, including offering needle and syringe programmes and methadone replacement centres. However, assistance for human trafficking victims is limited. The government has yet to establish legislation for witness protection, but the Office of the Director of Public Prosecutions has formulated guidelines to assist prosecutors. Prevention policies exist, but implementation is often undermined by corruption. Public mistrust of police and judicial corruption has led to a focus on victim rehabilitation rather than prevention.

Ugandan civil society plays a prominent role in combatting organized crime, especially human trafficking, with the majority of support being provided by NGOs. Churches in Uganda have also been extremely vocal in speaking out against human trafficking. In 2021, the government halted, without prior notice, the activities of many civil society groups, including human rights and election-monitoring organizations. During the election campaign, internet access was also reportedly disconnected and social media access blocked. Self-censorship is apparent as intimidation and violence by state security forces against journalists and civil society groups working on governance and accountability occurs regularly. The media fears covering, airing and printing any views critical of the ruling elite. The Ugandan government also reportedly revokes journalist broadcasting licenses without due legal process.

---

*This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.*