

April 23, 2026

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Attn: Joint Committee of the Committee on Defence and Internal Affairs and the
Committee on Legal and Parliamentary Affairs

**RE: Submission of Comments on The Protection of Sovereignty Bill, 2026 (Bill
No. 13)**

The International Bank for Reconstruction and Development (“IBRD”), the International Development Association (“IDA”), the International Finance Corporation (“IFC”), the Multilateral Investment Guarantee Agency (“MIGA”), and the International Centre for Settlement of Investment Disputes (“ICSID”) (together, the “World Bank Group” or “WBG”) welcome the opportunity to provide comments on the **Protection of Sovereignty Bill, 2026** (the “Bill”).

The WBG recognizes the sovereign right of the Republic of Uganda (“Uganda”) to enact legislation in furtherance of its national interests, including to regulate the conduct of foreign actors within its territory. These comments are submitted in a spirit of partnership and constructive engagement, with a focus on seeking clarification regarding the Bill’s scope of application as it relates to the WBG’s legal status and its ability to operate in Uganda. Specifically, we would like to draw to the attention of the Committee that the Bill could materially affect how the World Bank Group - and other multilateral development banks (“MDBs”) - operate in Uganda.

We note that the Bill seeks to address the protection of the sovereignty of the people of Uganda, including through, registration and regulation of agents of *foreigners*, as defined by the Bill, and regulation of funding or other assistance to agents of foreigners.

I. Overview of the WBG Institutions and Uganda’s International Obligations

The WBG institutions are public international organizations established by their member countries pursuant to their Articles of Agreement, for IBRD, IDA and IFC, or their Conventions for MIGA and ICSID (“Constitutive Documents”). Pursuant to their Constitutive Documents, the WBG institutions are endowed with certain privileges and immunities which enable their ability to function internationally without undue interference from governments or individuals, including, *inter alia*, immunity of Bank assets from seizure, inviolability of its archives, immunity of officers and employees from legal process in connection with official acts, immunity of Bank assets and income from all taxation and from all customs duties, and tax immunity for the salaries and emoluments of Bank officials and employees. As specialized agencies of the United

Nations, IBRD, IDA and IFC also enjoy privileges and immunities by virtue of the *United Nations Convention on the Privileges and Immunities of the Specialized Agencies* (“SA Convention”), which accords, *inter alia*, additional archival immunity, the inviolability of their premises, exemption from taxation, facilities in respect of official communications and correspondence, and additional privileges and immunities granted to officials of the specialized agencies.

The Republic of Uganda is a member of all five WBG institutions.¹ As a signatory to the Constitutive Documents of those institutions, the Republic of Uganda has recognized and is obligated to take all necessary steps to give effect to the status, privileges and immunities of the WBG and its staff members. In addition, on August 11, 1983, the Republic of Uganda acceded to the SA Convention with respect to IBRD, IDA and IFC.²

In making the below submissions, we identify aspects of the Bill that have consequences for the legal obligations accepted by the Republic of Uganda as signatory to the WBG Constitutive Documents and the SA Convention. We also note that the draft provisions do not reflect consideration of the operational model of development institutions such as the WBG, or the potential implications of the Bill on such operations.

The WBG’s operations in Uganda, as is in other member countries, is carried out through an interconnected ecosystem that includes government counterparts, implementation units, development partners, civil society organizations, consultants, contractors, researchers, journalists, and beneficiary communities. These interactions depend on, among others, information-sharing, policy dialogue, project implementation activities, institutional engagement, and the receipt of foreign funds.

As drafted, the Bill may give rise to legal or operational implications across each layer of this ecosystem.

II. Status of the World Bank Group under the Bill

The Bill defines a “*foreigner*” to include international and multinational organizations, and an “*agent of a foreigner*” as “ a person who acts as an agent, representative, employee or servant, or any person who acts in any other capacity at the order, request, or under the direction or control of a foreigner or of a person, any of whose activities are directly or indirectly supervised, directed, controlled or financed, or subsidized by a foreigner. (Part I, 1). These definitions together capture the WBG, its employees and would, in practice, extend to a wide range of Ugandan actors engaged in WBG-financed activities, including civil servants seconded to Project Implementation Units, non-government organizations, consultants, contractors, community organizations, and journalists participating in WBG-supported programs. Such actors would be required to register as agents of a foreigner, obtain ministerial certification, disclose funding sources, submit returns, and comply with the enforcement regime under the Bill - requirements that may have implications for engagement with the WBG, as well as for development activities in Uganda more broadly.

¹ The Republic of Uganda became a member of (i) IBRD, IDA, and IFC on September 27, 1963, (ii) MIGA on June 10, 1992; and ICSID on October 14, 1966.

² SA Convention: (i) Annex VI, IBRD, (ii) Annex XIII, IFC, and (iii) Annex XIV, IDA.

While the Bill purports to apply subject to the Diplomatic Privileges Act (Section 2(3)), this clause appears limited to a “representative or agent of an embassy, high commission or consulate,” and does not expressly acknowledge representatives or agents of international organizations, such as the WBG, who similarly enjoy certain privileges and immunities in their operations that derive from a different legal basis. It remains unclear whether individuals and entities interacting with the WBG in the course of delivering its mandate would be protected from classification as a ‘foreigner’ and its employees and partners would be protected from classification as ‘agents of a foreigner’.

By classifying international organizations as "foreigners" without qualification, the Bill subjects them — and by extension, their operations, staff, and funding — to all of its substantive restrictions, registration requirements, financial reporting obligations, and criminal penalties, unless an exemption applies. As noted above, the only savings or exemption clause in the Bill (Clause 2(3)) does not appear to exempt international organizations from its application.

As drafted, the Bill may introduce restrictions affecting the WBG that do not clearly reflect the treaty obligations set out in its Constitutive Documents, and SA Convention, as well as provisions under applicable national law. We also remain concerned that the definition of "foreigner" grants the Minister of Internal Affairs residual power to declare any "person, institution or body" to be a foreigner by statutory instrument. Without adequate safeguards, this provision may allow for changes to the status of an international organization in a manner that may be inconsistent with Uganda's existing treaty commitments (Part I, Section 1(f)).

III. Criminalization of Core WBG activities

A significant concern is that the Bill criminalizes conduct that closely aligns with the WBG’s core work.

As part of its development mandate, the WBG, and those who are involved with carrying out its functions, regularly initiate dialogue on policy, develop policy options and comment on policy both in relation to its lending and non-lending products (**Section 2, 7; and Section 10(2)**). The Bill as currently drafted criminalizes the activities of agents of a foreigner where the activity seeks to influence the development of the policy of the Government. The Bill also criminalizes the organization of a meeting or other function to promote foreign policy that has not been adopted by the cabinet as Government policy. This broad language could conceivably cover meetings and conferences that involve the discussion of policy options or engage in policy dialogue, including with development partners. The penalty for such offense is a fine in the case of a legal entity and a fine or imprisonment for up to 20 years in the case of an individual.

Similarly, the WBG, and those who are involved with carrying out its functions, including development partners, often publish information (including, for example, macroeconomic and fiscal assessments; creditworthiness, risk and financing constraints; governance, institutional and fiduciary findings; and policy reform conditionalities or triggers) that could be perceived by some as ‘weakening or causing insecurity’ with respect to Uganda’s economic standing (**Section 13**).

Technical assistance, analytical reports, and advisory engagements with government counterparts are among the WBG's most important functions. These activities are not political interference — they are undertaken at the request of and in partnership with Uganda and are essential to the fulfilment of Uganda's own development objectives. As it stands, the Bill could potentially criminalize activities such as country diagnostic work, economic and sector work, debt reporting, macroeconomic assessments and the B-Ready initiative (which is the WBG's flagship data collection and analysis project assessing the business and investment climate of members worldwide).

The Bill also restricts the receipt of funds from foreigners within a twelve-month period without approval from the Minister of Internal Affairs and requires banks to report and seek authorization for related transactions (**Section 22, 25**). These limitations could directly affect project grants and disbursements. Each qualifying disbursement would require separate approval, raising serious feasibility concerns.

Accountability mechanisms would also be affected, as communities engaging with the Inspection Panel or similar processes could be deemed agents of a foreigner and exposed to criminal liability.

As drafted, the scope of these provisions may extend to routine development activities, potentially exposing such activities to criminal liability, with penalties of up to twenty years' imprisonment. This is likely to impact the ability of the WBG to operate in Uganda. Moreover, the Bill includes provisions that run counter to the WBG's privileges and immunities. These include but are not limited to immunity of assets from seizure, immunity of archives, freedom of assets from restriction, and immunities and privileges of officers and employees from legal probes with respect to acts performed by them in their official capacity, as well as the WBG's free expression in official communications. In this regard we also highlight **Section 28** which authorizes a person appointed by the Minister of Internal Affairs, at any reasonable time, to enter and inspect the premises of an agent of a foreigner and request any information or records that appear necessary to him or her to give effect to the Act, which would stand in conflict with the inviolability of the WBG premises and archives.

IV. The World Bank Group submits that it should be explicitly excluded from the definition of 'foreigner' under the Bill.

Rather than relying solely on Clause 2 (3) — which, as currently drafted, does not extend to international organizations — the Bill would benefit from a dedicated exemption provision to confirm that the Bill does not apply to international and multinational organizations, such as the WBG. Moreover, the exemption should clarify that staff of such organizations — both local and international — acting within the scope of their official duties are not "agents of a foreigner" for the purposes of the Bill and expressly provide that the exercise of Ministerial powers under the Bill shall not be exercised in a manner inconsistent with Uganda's existing international obligations. With this exemption, the official activities of such organizations, including policy discussions, advisory work, operational financing, and engagement with civil society in the course of their mandates, would proceed unfettered by the registration, reporting, funding cap, or inspection provisions of the Bill.

V. Conclusion

The WBG is committed to operating in full respect of Ugandan law and in close partnership with the Government. We do not oppose the principle of legislative oversight of foreign actors operating in Uganda. However, the Bill, as currently drafted, does not adequately distinguish between international organizations operating under treaty-based frameworks and other foreign actors whose activities may warrant the regulatory attention the Bill is designed to provide.

The refinements and clarifications proposed in these comments are modest and narrowly focused. They would preserve the core objectives of the Bill while ensuring alignment with Uganda's existing international obligations and providing greater certainty for the continued operations of international organizations engaged in supporting Uganda's development priorities.

We remain available for dialogue with the relevant authorities and would welcome the opportunity to discuss these comments further.