MAPS | Methodology for Assessing Procurement Systems

ASSESSMENT OF THE REPUBLIC OF ZIMBABWE PUBLIC PROCUREMENT SYSTEM

2026

MAPS APPROVED

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Assessment of the Republic of Zimbabwe Public Procurement System

VOLUME 1: MAIN REPORT

MAPS | Methodology for Assessing Procurement Systems

Republic of Zimbabwe

Assessment of the Public Procurement System

APRIL 2026

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The MAPS Assessment team was led by Mr. Amilcar Bilale, supported by the following team of experts from the AfDB: Ms. Mei Ling Lee, Ms. Nderr Geneviève Angoran, Mr. Fenwick Kamanga, Mr. David Munemo, Mr. Jonathan Nyamukapa, Mr. George Honde, and Mr. Rees Mpofu. The Lead Assessor for this assessment was Ms. Susan Penelope Smith, supported by Ms. Allison Anthony and Mr. Denias Kagande.

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Assessment data

ASSESSED JURISDICTION	Republic of Zimbabwe	
FRAMEWORK APPLIED	MAPS MAIN	N/A
ASSESSED LEVEL	National	
ASSESSMENT TIMEFRAME	08/2025-03/2026	
LEAD ASSESSOR	Ms. Susan P Smith	
ASSESSORS	Pillar I/legal analysis - Dr. Allison Anthony Pillars II-III/e-Procurement - Ms. Nderr Geneviève Angoran Pillar III - Dr. Denias Kagande	

Acronyms

AfCFTA	African Continental Free Trade Area
AfDB	African Development Bank
AG	Attorney General
AI	Artificial Intelligence
APP	Annual Procurement Plan
ASC	Assessment Steering Committee
ATAG	Assessment Technical Advisory Group
CCC	Citizens Coalition for Change
CIC	Community Information Centre
CGU	Corporate Governance Unit in the Office of the President and Cabinet
CIFA	Country Integrated Fiduciary Assessment
COMESA	Common Market for Eastern and Southern Africa
CPAR	Country Procurement Assessment Review
CSO	Civil Society Organisation
CSV	Comma-Separated Values
DoI	Declaration of Interest
eGP	Electronic Government Procurement System
GDP	Gross Domestic Product
GPA	Agreement on Government Procurement
HIV	Human Immunodeficiency Virus
ICT	Information and Communication Technology
IMF	International Monetary Fund
IPP	Individual Procurement Plan
M&E	Monitoring and Evaluation function of PRAZ
MAPS	Methodology for Assessing Procurement Systems
MIF	Mutapa Investment Fund
MDAs	Ministries, departments and agencies
MoFEDIP	Ministry of Finance, Economic Development, and Investment Promotion
MSME	Micro, Small and Medium Enterprises
NACS1	National Anti-Corruption Strategy (2020-2024
NANGO	National Association of Non-Governmental Organisations
NDS1	National Development Strategy 2021-2025)
NDS2	National Development Strategy 2026-2030
NPA	National Prosecuting Authority of Zimbabwe
OAG	Office of the Auditor-General
OCDS	Open Contracting Data Standards
OPC	Office of the President and Cabinet
PAC	Public Accounts Committee
PBO	Parliamentary Budget Office
PE	Procuring Entity
PECOG	Public Entities Corporate Governance Act
PFM	Public Finance Management
PFMA	Public Finance Management Act
PMU	Procurement Management Unit
PPDPA Regs.	Public Procurement and Disposal of Public Assets (General) Regulations

PPDPAA	Public Procurement and Disposal of Public Assets Act
PPP	Public Private Partnership
PRAZ	Procurement Regulatory Authority of Zimbabwe
RBZ	Reserve Bank of Zimbabwe
RMC	Regional Member Country
SADC	Southern African Development Community
SAP	System Applications and Products accounting system
SDG	United Nations Sustainable Development Goal
SME	Small and Mediums-sized Enterprises
SPOC	Special Procurement Oversight Committee
SPP	Sustainable Public Procurement
ToT	Training of Trainers
UN	United Nations
USD	United States Dollar
VfM	Value for Money
WB	World Bank
WTO	World Trade Organization
ZACC	Zimbabwe Anti-Corruption Commission
ZANU-PF	Zimbabwe African National Union–Patriotic Front
ZiG	Zimbabwe Gold
ZRP	Zimbabwe Republic Police
ZWG	Zimbabwe Gold
ZWL	Zimbabwean Dollar

Other information

Fiscal year: 01 January to 31 December

Executive summary

This MAPS Assessment has taken place at a particularly good point in the ongoing development of the procurement system in Zimbabwe. A new modern public procurement law, the Public Procurement and Disposal of Public Assets Act, was adopted in 2018, with supporting Regulations. Proposed amendments to the PPDPAA are currently being discussed by Parliament, and review of the general Regulations is planned. Draft Regulations are being prepared including to address use of eGP, monitoring, evaluation and compliance and professionalisation and licensing. The PPDPAA established the Procurement Regulatory Authority for Zimbabwe (PRAZ). PRAZ has, since its establishment in 2018, led on the implementation and monitoring of the new law as well as capacity building of stakeholders and has been responsible for the introduction of the new eGP system which was rolled out during 2024/2025.

The MAPS Assessment has allowed for detailed investigation of the impact of these developments to date and identification of areas from improvement in the public procurement to deliver greater transparency, efficiency and value for money (VfM). Ongoing improvements will also strengthen the public procurement ecosystem for use as a strategic lever and practical tool to deliver national objectives described in Zimbabwe's National Development Strategy (NDS2), in line with regional, continental and global frameworks, including the United Nations Sustainable Development Goals (SDGs) 2015-2030.

The MAPS Assessment for Zimbabwe was launched in August 2025 with the main assessment period running from September 2025 to January 2026, concluding with validation in February 2026. Information for the MAPS Assessment was collected using a combination of an initial desk-based review substantially enhanced by a series of extremely helpful and informative in-person in-country meetings, forums, workshops and online meetings with a diverse group of stakeholders. Data sources included the eGP system and published eGP data, PRAZ monitoring and evaluation datasets with the standard period used for the quantitative data analysis being the financial years 2022 to 2025. Another valuable source of qualitative and quantitative data is found in responses to the anonymous on-line survey questionnaires completed by the private sector (449 responses) and civil society organisations (10 responses). Analysis was further strengthened using data from the sampling of 108 procurement files at the premises of 19 procuring entities.

The Zimbabwean procurement system is built on a well recorded and organised legal hierarchy, primarily governed by the Public Procurement and Disposal of Public Assets Act and supporting Regulations and circulars. This presents a comprehensive framework for conduct of public procurement which is generally good. There are a few areas identified for improvement in the legal and regulatory framework, in particular to better align that framework with eGP as it continues to be rolled out in practice for comprehensive use by all procuring entities. It is also recommended that to enhance competition, transparency and value of money outcomes, provisions permitting use of direct award are reviewed and strengthened to ensure that they are applied only in exceptional cases. Practical measures to improve record keeping at procuring entity level in the transition to full eGP will further enhance efficiency and transparency. It will also be beneficial to fully embed economic, social and environmental sustainability at all stages in the procurement cycle, in the context of a comprehensive sustainable public procurement strategy.

In a number of cases, Gaps identified in the MAPS Assessment reflect wider systemic problems which will require high levels of broad inter-institutional cooperation and investment. These Gaps create vulnerabilities that cannot be resolved solely through actions in the public procurement sphere. For example, weak budgetary and financial controls impact negatively on the public procurement system. NDS2 acknowledges the need for enhanced expenditure and commitment control and identifies remedial measures to be taken including by Government, Treasury, MDAs and internal audit, which will need to align with ongoing developments in public procurement led by PRAZ. Similarly, procurement specific measures are part of a wider agenda and inter-institutional effort to deliver a fully functioning and robust anti-corruption framework which the second National Anti-Corruption Strategy will look to address.

The introduction of the eGP system represents a significant leap forward for the procurement ecosystem in Zimbabwe, already delivering increased transparency and heralding greater efficiency for the conduct of procurement processes. This MAPS Assessment flags current limitations with the eGP system and includes recommendations for improved eGP data collection and data analytics so that the eGP system may be used in the most effective way as a driver for effective analysis, strategic change and greater accountability. In parallel with technical advancements, strengthening procurement as a profession and delivering targeted capacity building for all stakeholders — including procuring entities, the private sector (especially MSMEs), and civil society — will enhance the functioning of and confidence in the public procurement system.

A high-level Strategic Action Plan, prepared jointly by PRAZ and the MAPS Assessment Team, is presented in this Report. The Strategic Action Plan lists ten Proposed Actions as comprehensive thematic initiatives, with timelines for implementation. Responsible institutions are named, including to indicate where inter-institutional cooperation will be essential for effective delivery of the Proposed Actions. The ten Proposed Actions are listed below. Implementation of several of the Recommendations is already underway:

1. Implement legislative improvements to address observed gaps or overreach in the procurement framework
2. Institute oversight frameworks to strengthen accountability systems and coordination of oversight bodies
3. Review and consolidate procurement guidelines and operational manuals to address gaps observed in operational processes
4. Develop a capacity-building and professionalisation strategy to address competency gaps informed by the assessment
5. Incorporate enhanced information repositories and transparency tools within the PRAZ portal and eGP platform
6. Implement eGP system enhancements to strengthen automation, data integrity and procurement monitoring.
7. Integrate the Public Finance Management System with the eGP system to enhance information exchange, strengthen expenditure control and planning.
8. Develop and implement a national sustainable public procurement policy framework.
9. Institute convenient regulatory support mechanisms for procuring entities and suppliers.
10. Strengthen transparency, open data, and stakeholder participation.

Overview of compliance

The following table provides an overview of the findings of the assessment on the level of sub-indicators. For each sub-indicator the table shows whether gaps were identified and at which risk level. The table also shows red flags raised.

PILLAR I		Gaps identified: None	Only low or medium risk	High risk	Red flags
1. The public procurement legal framework achieves the agreed principles and complies with applicable obligations.	1(a) – Scope of application and coverage of the legal and regulatory framework		**X**		
	1(b) – Procurement methods			**X**	
	1(c) – Advertising rules and time limits		**X**		
	1(d) – Rules on participation		**X**		**X**
	1(e) – Procurement documentation and technical specifications	**X**			
	1(f) – Evaluation and award criteria	**X**			
	1(g) – Submission, receipt, and opening of tenders		**X**		
	1(h) – Right to challenge and appeal		**X**		
	1(i) – Contract management		**X**		
	1(j) – Electronic Procurement (e-Procurement)			**X**	
	1(k) – Norms for safekeeping of records, documents and electronic data.		**X**		
	1(l) – Public procurement principles in specialised legislation	**X**			
2. Implementing regulations and tools support the legal framework.	2(a) – Implementing regulations to define processes and procedures		**X**		
	2(b) – Model procurement documents for goods, works, and services		**X**		
	2(c) – Standard contract conditions		X		
	2(d) – User's guide or manual for procuring entities	X			
3. The legal framework reflects the country's secondary policy objectives and international obligations	3(a) – Sustainable Public Procurement (SPP)			X	X
	3(b) – Obligations deriving from international agreements			X	

PILLAR II		Gaps identified: None	Only low or medium risk	High risk	Red flags
4. The public procurement system is mainstreamed and well integrated with the public financial management system.	4(a) – Procurement planning and the budget cycle			**X**	**X**
	4(b) – Financial procedures and the procurement cycle			**X**	**X**

PILLAR II		Gaps identified: None	Gaps identified: Only low or medium risk	Gaps identified: High risk	Red flags
5. The country has an institution in charge of the normative/regulatory function.	5(a) – Status and legal basis of the normative/regulatory function	X			
	5(b) – Responsibilities of the normative/regulatory function	X			
	5(c) – Organisation, funding, staffing, and level of independence and authority	X			
	5(d) – Avoiding conflict of interest	X			
6. Procuring entities and their mandates are clearly defined.	6(a) – Definition, responsibilities and formal powers of procuring entities		X		
	6(b) – Centralised procurement body	X			
7. Public procurement is embedded in an effective information system.	7(a) – Publication of public procurement information supported by information technology			X	
	7(b) – Use of e-Procurement			X	
	7(c) – Strategies to manage procurement data			X	
8. The public procurement system has a strong capacity to develop and improve	8(a) – Training, advice and assistance		X		
	8(b) – Recognition of procurement as a profession	X			
	8(c) – Monitoring performance to improve the system	X			

PILLAR III		Gaps identified: None	Gaps identified: Only low or medium risk	Gaps identified: High risk	Red flags
9. Public procurement practices achieve stated objectives.	9(a) – Planning			X	
	9(b) – Selection and contracting			X	
	9(c) – Contract management in practice			X	
10. The public procurement market is fully functional.	10(a) – Dialogue and partnerships between public and private sector			X	X
	10(b) – Private sector's organisation and access to the public procurement market		X		
	10(c) – Key sectors and sector strategies	X			

PILLAR IV		Gaps identified: None	Only low or medium risk	High risk	Red flags
11. Transparency and civil society engagement strengthen integrity in public procurement.	11(a) – An enabling environment for public consultation and monitoring			X	X
	11(b) – Adequate and timely access to information by the public			X	
	11(c) – Direct engagement of civil society	X			
12. The country has effective control and audit systems.	12(a) – Legal framework, organisation and procedures of the control system			X	X
	12(b) – Coordination of controls and audits of public procurement		X		
	12(c) – Enforcement and follow-up on findings and recommendations			X	X
	12(d) – Qualification and training to conduct procurement audits		X		
13. Procurement appeals mechanisms are effective and efficient.	13(a) – Process for challenges and appeals			X	
	13(b) – Independence and capacity of the appeals body	X			
	13(c) – Decisions of the appeals body		X		
14. The country has ethics and anti-corruption measures in place.	14(a) – Legal definition of prohibited practices, conflicts of interest, and associated responsibilities, accountabilities and penalties			X	X
	14(b) – Provisions on prohibited practices in procurement documents	X			
	14(c) – Effective sanctions and enforcement systems	X			
	14(d) – Anti-corruption framework and integrity training			X	X
	14(e) – Stakeholder support to strengthen integrity in procurement			X	X
	14(f) – Secure mechanisms for reporting prohibited practices or unethical behaviour			X	X
	14(g) – Codes of conduct/codes of ethics and financial disclosure rules			X	X

1. Introduction

1.1 Context

On 16 July 2024, the Government of Zimbabwe (Government), represented by the Procurement Regulatory Authority of Zimbabwe (PRAZ) wrote to the African Development Bank (AfDB) formally requesting AfDB's support to lead the assessment of the public procurement system of Zimbabwe in collaboration with the Government. Prior to this MAPS Assessment there had been no comprehensive country-level procurement assessment carried out in Zimbabwe.

This MAPS Assessment has taken place at a particularly good point in the ongoing development of the procurement system in Zimbabwe. A new modern public procurement law, the Public Procurement and Disposal of Public Assets Act [Ch:22:23] ("PPDPAA") was adopted in 2018, with supporting Regulations. Proposed amendments to the PPDPAA are currently being discussed by Parliament and review of the general Regulations is planned. Draft Regulations are being prepared including to address use of eGP, monitoring, evaluation and compliance and professionalisation and licensing. The PPDPAA established the Procurement Regulatory Authority for Zimbabwe (PRAZ). PRAZ has, since its establishment in 2018, led on the implementation and monitoring of the new law as well as capacity building of stakeholders and has been responsible for the introduction of the new eGP system which was rolled out during 2024. The MAPS Assessment has provided an opportunity, in particular, to: investigate in detail how the PPDPAA has been interpreted and applied in practice over several years and recommend areas for improvement; observe development of the procurement system in Zimbabwe including the impact of increased transparency, monitoring and evaluation by PRAZ, and identify further measures to enhance system performance, and; assess the current state of play on availability and use of the eGP system to inform the ongoing transition to full use of eGP at all stages of the procurement cycle.

1.2 Involved institutions, coordination and governance

Lead institutions and coordination: The lead institution for this MAPS Assessment is the African Development Bank. The lead country institution is PRAZ, which has provided proactive support and assistance to the MAPS Assessment team, providing extensive information and data as well as coordinating and facilitating the conduct of the MAPS Assessment. During the assessment period and validation, the MAPS Assessment team met with other key stakeholder institutions, including finance, audit and anti-corruption authorities.

See further information on institutional stakeholders in section 2.2 and wider stakeholder mapping in section 2.4. See also, Annex 2 for information on institutional and other stakeholders whom the MAPS Assessment team met.

Assessment Steering Committee: The MAPS for Zimbabwe Assessment Steering Committee (ASC) was established under the Chairmanship of the Chief Executive Officer of PRAZ. Membership of the ASC includes officials from the Ministry of Finance, Economic Development and Investment Promotion (MoFEDIP), Office of the President and Cabinet and other stakeholder institutions, including the Office of the Auditor General, Zimbabwe Revenue Authority and the Zimbabwe Anti-Corruption Commission.

Representatives of the private sector, including SMEs, education providers and civil society organisations, played an important role as active members of the ASC.

The MAPS Assessment team met in person with the ASC in Harare during the launch week in August 2025. The MAPS Assessment team also provided monthly written ASC updates to report on progress, and in December 2025/January 2026, in the run-up to validation, shared the draft Matrix with the ASC with briefing notes. The shared Matrix provided the basis for discussion and input from the ASC when the MAPS Assessment team met with the ASC in Harare for validation in February 2026.

The MAPS Assessment team had a dedicated AfDB email address to facilitate direct communication with ASC members and other stakeholders

See Annex 1 for the list of ASC members, dates of meetings, briefings and updates.

1.3 The MAPS Assessment team and supporting input

The core members of the MAPS Assessment team for Zimbabwe are:

Team Leader, AfDB	Mr. Amílcar Bilale
Lead Consultant	Ms. Susan Penelope Smith (Susie Smith)
Legal Consultant	Dr. Allison Anthony
Local Consultant	Dr. Denias Kagande
Senior System Information Officer, AfDB	Ms. Nderr Geneviève Angoran
Procurement Consultant, AfDB	Ms. Mei Ling Lee
Principal Procurement Officer, AfDB	Mr. David Munemo
Regional Financial Management Coordinator, AfDB	Mr. Jonathan Nyamukapa
Principal Governance Officer, AfDB	Mr. Fenwick Kamanga
Country Economist, AfDB	Mr. George Honde

The AfDB country office in Zimbabwe provided practical support.

The MAPS Assessment team was also able to benefit from the expertise of the World Bank led project to assess the eGP system which was being conducted at the same time as the MAPS Launch Mission in August 2025.

The MAPS Assessment team has had input from, and numerous helpful discussions with, the CEO of PRAZ, Dr. Clever Ruswa and his executive team. Invaluable support has been provided by the MAPS Assessment National Coordinator, Mr. Charles Gombiro. Director of Monitoring and Evaluation, PRAZ and Mr. Keith Chiroodza, Risk and Strategy Manager, PRAZ.

1.4 Objectives

The broad objective of this MAPS assessment is to comprehensively assess Zimbabwe's public procurement system to inform and support the ongoing reform programme that strengthens transparency, efficiency, integrity, and VfM, while enhancing the contribution of public procurement to sustainable development and economic recovery. Specific objectives are, in summary, to:

- Assess and benchmark Zimbabwe's public procurement system to identify strengths, weaknesses, and systemic gaps across the legal, regulatory, and institutional framework of public procurement, including the role and capacity of the PRAZ;
- Help inform ongoing legislative reform and support development of new Regulations, sustainable procurement guidelines and proposals for training and professionalisation;
- Assess the effectiveness of current mechanisms, with particular reference to the new eGP system;
- Support the Government in prioritising procurement reforms that strengthen accountability, improve risk management, promote sustainable public procurement, and enhance integration with public finance management systems.

The MAPS Assessment also aims to examine the extent to which procurement practices enable fair market access and private sector participation, fostering a transparent and efficient procurement environment aligned with national development goals.

1.5 Scope – procuring entities and subject matter

This MAPS assessment was carried out using the Methodology for Assessing Procurement Systems[1](MAPS Main), covering all four Pillars. The working language of the assessment is English. The MAPS assessment covers procurement of works, goods, services and consultancy services by all types of procuring entities (PEs), as defined in the PPDPAA. Defined procuring entities are government ministries, departments and agencies (MDAs); local authorities, provincial and metropolitan councils; parastatals and state-controlled companies/State-Owned Enterprises (SOEs) and other specified type of entities. In 2025, the total number of PEs registered with PRAZ was 372, comprising 29 ministries, 92 local authorities, 237 parastatals (SOEs fall within this category) and 14 commissions. According to data collated by PRAZ 206,445 procurement contracts were awarded in 2025, with a total value of USD 2.3 billion.[2]

1.6 Methodological decisions – sampling and data collection

Sampling - Data collection from representative samples of actual procurement transactions, from planning to contract management ("procurement files"), for assessment under indicator 9: The original proposal in the Concept Note was to sample approximately one hundred (100) public contracts from fifteen (15) procuring entities covering a minimum period of three (3) full financial years, drawing on available data from the eGP system from 2024 and procurement files provided by procuring entities for the entire period.

The approach was adjusted in August/September 2025, prior to starting the process of sampling physical files. This followed team discussions and advice from the team's local expert, in light of the analysis of the initial tranche of data made available from PRAZ databases on activities of procuring entities. It was decided to adjust the sampling to increase the number of procuring entities to twenty (20) in order to obtain more representative coverage of all types of procuring entities (central government (MDAs), local government, parastatals and state-owned enterprises) with a range of functions. As a result, the number of files to be sampled from each procuring entity was reduced. The sample was designed to be representative, taking into account the size, value and different categories of procurement (construction works, goods, consultancy and non-consultancy services). At an early stage in the process for sampling of

[1] MAPS Methodology Version 2018 as updated in 2025 and 2026.

[2] Derived from data submitted by procuring entities through monthly self-reporting to the PRAZ Monitoring and Evaluation team. See Qualitative Analysis at 7(a)(c) for further detail.

physical files, issues were encountered on the ground with one MDA procuring entity which had inadequate recording mechanisms. The MAPS Assessment team was unable to obtain the required files from that entity. The total number of files sampled from the 19 remaining procuring entities was 108, falling within four financial years, 2022 to 2025.

It was predicted in advance that data available from the eGP system for the purpose of assessment of actual procurement files would be limited. This was due to the recent introduction and phased roll out of the eGP system. In order to select procuring entities and files for sampling, the MAPS Assessment team used a combination of data collated by PRAZ through its monitoring and evaluation function, available eGP data and responses to data requests supplied by procuring entities on a provisional list of procuring entities to be sampled.

The procuring entities sampled and a summary of the number of files sampled (by category of procurement) from each procuring entity are listed in **Error! Reference source not found.** below.

Procuring Entities	Goods	Works	Consulting Services	Non-Consulting Services	Total
Local Authorities					
Bulawayo City Council	4	2		1	**7**
Chegutu Rural District Council	7			1	**8**
City of Harare	1	1	1	1	**4**
Ministries					
Ministry of Foreign Affairs and International Trade (MOFAIT)	3		1		**4**
Ministry of Lands, Agriculture, Fisheries Water and Rural Development	6	3		1	**10**
Ministry of Mines and Mining Development	3				**3**
Ministry of Public Works and Public Works	4			2	**6**
Ministry of Tourism and Hospitality Industry	5	1			**6**
Ministry of Transport and Infrastructural Development (MOTID)	3		2		**5**
Ministry of Women Affairs, Community, Small Medium Enterprises Development (MWACSMED)	3		1		**4**
Ministry of Health and Child Care	3		1	1	**5**
Parastatals/SOEs					
National Pharmaceutical (NATPHARM)	9			3	**12**
Parirenyatwa Group of Hospitals (PGH)	4	1			**5**
Parliament of Zimbabwe	3	3		2	**8**

Rural Electrification Fund	1			4	**5**
University of Zimbabwe (UZ)	3			1	**4**
Zimbabwe Broadcasting Corporation (ZBC)	3		1		**4**
Zimbabwe Electricity Transmission and Distribution Company	4			1	**5**
Zimbabwe Revenue Authority (ZIMRA)	1			2	**3**
Total	**70**	**11**	**7**	**20**	**108**

Table 1: Procuring entities sampled procurement files

At the time of the sampling, procurement processes were (and they continue to be) in transition from paper-based procurement to electronic procurement. The eGP system is still primarily used by procuring entities to publish on a limited amount of information: Annual Procurement Plans; notices of opportunities to bid (tender notices), and bidding documents or information on how to obtain those documents. The conduct of procurement processes after advertisement is generally carried out off-line. Thus, the sampling of procurement files to assess the process from planning to contract delivery, was based on physical inspection of files held by procuring entities with some cross checking to data available from PRAZ/eGP system.

Lack of data or incomplete data, particularly data extracted from procurement files, was identified in the Concept Note as a possible risk, including risk of delay. In practice, thanks to the efforts of the local consultant and cooperation from procuring entities, the visits for data collection of sampled files were completed in a 5-week period, concluding on 14 October 2025. This was well within the planned 3-month timeline for this activity.

Results of the sampling process were presented as part of the validation process and were used to prompt useful and informative discussions at the Procuring Entity Discussion Forum in February 2026, which are reflected in this Report.

Qualitative and quantitative data from PRAZ: PRAZ provided both documents and statistical information to assist the qualitative and quantitative analysis. Data available from the eGP system is currently limited. Most of the quantitative analysis in this report relating to procurement activity thus relies on data collected by PRAZ from monthly reports submitted by registered procuring entities, as part of its well-established Monitoring and Evaluation function. PRAZ shared with the MAPS Assessment team both raw data and monthly and quarterly stakeholder reports. The standard period used for the quantitative data analysis is the financial years 2022 to 2025.

Qualitative and quantitative data from institutional stakeholders: Data from institutional stakeholders was obtained from (1) published online resources, where available, and (2) direct engagement with key stakeholders, using a mix of online and in-person meetings, with follow up requests for additional data and information as necessary.

Surveys and direct engagement with the private sector and civil society organisations: The MAPS Assessment team prepared online Jotform based anonymous survey questionnaires for (1) private sector/bidder community, including MSMEs; and (2) civil society organisations. Requests to participate in the survey were sent by the MAPS Assessment team from dedicated email address and links to the survey were also shared following engagement with stakeholders.

There were 449 responses to the private sector survey and 10 responses to the CSO survey. The results of the survey questionnaires were used to inform and support quantitative and qualitative analysis, including mandatory survey-based indicators. Aggregated results were presented to stakeholders and used to prompt discussions both during the verification week in November 2025 and validation in February 2026.

Other data and documents: Other data and documents were obtained online from publicly available data sources.

1.7 Process and revised (accelerated) timeline

The MAPS Assessment was conducted in three phases.

Phase 1 Planning and Preparation ran from May to July 2025 and involved activities including setting up the Assessment team, conducting stakeholder mapping and agreeing the composition of the Assessment Steering Committee. The Concept Note including the proposed timeline was prepared and submitted for external quality assurance by ATAG and MAPS secretariat with final approval given on 08 August 2025.

Phase 2 Conduct of the Assessment started in August 2025, with the launch mission in Zimbabwe from 18 to 22 August 2025. During the launch mission week, the MAPS Assessment team met in person with PRAZ and the ASC and had direct engagement with key institutional stakeholders and representatives of the private sector (including SMEs), civil society organisations and education/training providers.

The original timeline planned for the MAPS Assessment and described in the Concept Note envisaged formal launch of the Assessment in August 2025, validation in April/May 2026 and submission of the final Report for external quality assurance by ATAG and MAPS Secretariat in August 2026. During the course of the Launch Mission, following discussions between PRAZ, AfDB and the MAPS Assessment team, it was agreed to accelerate the process by 4 to 5 months to better support budget and reform agenda timelines. This resulted in moving the validation forward to early February 2026 and submission of the Report for external quality assurance by the end of March 2026. The revised project timeline, as presented to stakeholders at the Launch Workshop, is at Figure 1 below.

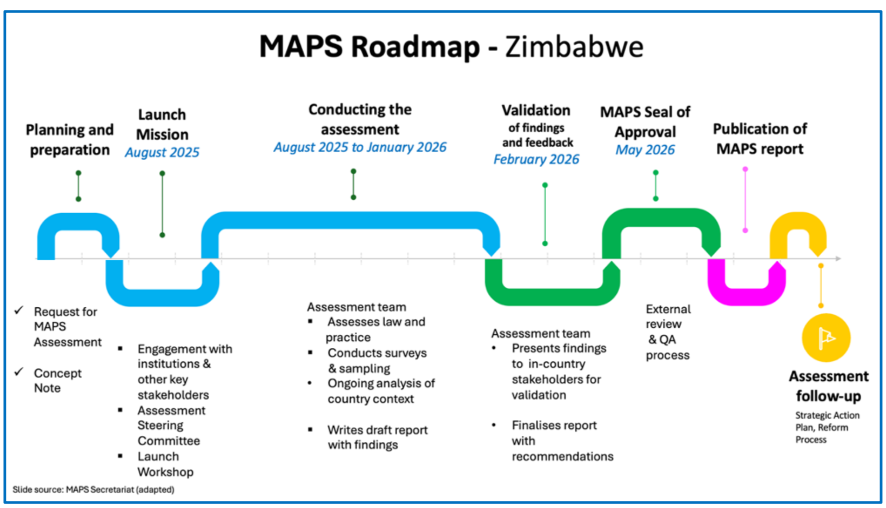

Figure 1: MAPS Zimbabwe revised timeline - August 2025

The Launch Workshop was held on 20 August 2025 with 150-plus participants in person and additional attendees online. Online anonymous surveys were launched in September 2025, with 449 responses to the private sector survey and 10 responses to the civil society survey received. Sampling of procurement files from 19 procuring entities was undertaken in a 5-week period in September/October 2025, led by Dr Denias Kagande (local expert consultant). In November 2025, Susie Smith (Lead Consultant) and Mei Lee (Procurement Consultant) returned to Zimbabwe and were joined by Dr. Denias Kagande, to verify interim findings and engage further with stakeholders including exploring initial analysis of survey responses with CSOs and private sector representatives. During Phase 2, the MAPS Assessment team had regular weekly online meetings with PRAZ. The MAPS Assessment team provided monthly updates/briefings to the ASC and shared the draft Matrix (with provisional Gaps identified) with the ASC and with PRAZ in December 2025/January 2026. Phase 2 concluded at the end of January 2026.

Phase 3 Validation, finalising report and external quality assurance – As noted under Phase 2, preparation for validation commenced in December 2025/January 2026 when the MAPS Assessment team shared the draft Matrix with the Assessment Steering Committee and PRAZ. There was a validation week in Harare from 2 to 6 February 2026 with wide stakeholder engagement. The MAPS Assessment team then finalised the report and submitted it for external quality assurance and approval. Further detail on the Phase 3 process from validation to approval is set out in section 5.

1.8 Limitations encountered in the assessment

Public Finance Management data: Procuring entities subject to the PPDPAA include central government (ministries, departments and agencies (MDAs)) local authorities, parastatals and many state-owned enterprises. The analysis of public finance management systems and data under Indicator 4 focuses on MDAs and the public finance management and SAP system used by Treasury. This is because in the case of local authorities, parastatals and state-owned enterprises the public finance management picture is extremely fragmented. Local authorities in Zimbabwe use different/diverse accounting systems which are generally not integrated or linked in with the Treasury System Applications and Products (SAP) accounting system. Local authority systems range from fairly high-level systems in the bigger local authorities, to basic software like PASTEL, and even manual systems and spreadsheets. Efforts are currently being made toward standardisation, with work on the on the Local Authorities Digital System, the Enterprise Resource Planning system which is under early stages of development by the Harare Institute of Technology. Whilst data on finance management of parastatals/SOEs is generally better than local authorities on account of better staffing, the issue of diverse financial/accounting management systems and non-integration with Treasury SAP is equally prevalent. Review of any selected local authorities' or parastatals'/SOEs' systems are unlikely to be representative of the situation in other local authorities or parastatals/SOEs, hence the decision to focus on MDAs.

In contrast, use of eGP applies to all types of procuring entities. The process of roll out of eGP to cover the entire procurement cycle should deliver enhanced transparency and data availability on commitments and expenditure for all procuring entities. The need for substantially improved public finance data and systems, ideally interoperable with the eGP system is recommended under indicator 4 and assigned a Red flag as this requires significant levels of inter-institutional cooperation and activities outside the procurement sphere.

Data reliability: The MAPS Assessment team encountered problems with consistency and reliability of procurement data for analysis.

The standard period used for the quantitative data analysis is the financial years 2022 to 2025. This period straddles the transition from use of the paper-based procurement to the gradual adoption of eGP, which is still in its early stages in terms of both use by procuring entities and data availability.

There is a well-established process for monthly reporting of procurement activity by registered procuring entities to PRAZ. Data is self-reported by procuring entities who complete and submit standard template spreadsheets. The Monitoring and Evaluation Directorate of PRAZ uses this data to prepare feedback direct to procuring entities and presents consolidated data from this and other sources in its Quarterly Stakeholder Reports. Data available through the eGP system is currently sparse, reflecting phased roll out of eGP modules during 2024 and 2025 and limited adoption of eGP for most phases of the procurement cycle. In addition, the MAPS Assessment team encountered inconsistencies in collection and reporting of data through the eGP system and by PRAZ in its monitoring and evaluation activities. Both sources differ fundamentally in the meaning of the terminology used for reporting. For instance, the concept of "registered" is interpreted differently: eGP reports are mainly based on the number of accounts created, while the M&E team applies a stricter approach, enforcing controls to determine whether an account can be counted for reporting purposes. In a number of cases, assumptions needed to be carefully interrogated in order to reconcile the data from these two sources or to fully understand the findings from available data. Most of the data on procurement activity presented in this Report and Indicator Matrix is drawn from the PRAZ monitoring and evaluation dataset as that was deemed to be more accurate and reliable than eGP data for reporting purposes.

The calculation of financial values is also affected by the currency switch in April 2024 and ongoing use of the multi-currency system both of which necessitated currency conversions as part PRAZ's analysis and reporting based on monitoring and evaluation team.

The MAPS Assessment team has been assisted by PRAZ in interpreting some of the complexities of the available data. The process was, however, helpful in identifying data collection shortfalls and recommendations for improvement.

2. Analysis of Context

2.1. Political, economic and geostrategic situation

Country Overview: The Republic of Zimbabwe is a landlocked country in southern Africa bordered by South Africa, Botswana, Mozambique and Zambia. It covers approximately 387,000 km², comprising high plateaus, savannas and mountain ranges, with a climate ranging from tropical to subtropical. The country is highly exposed to climate shocks, including recurrent droughts and floods. Harare is the administrative and legislative capital, while Bulawayo is the second largest city with significant historical and economic importance. According to the 2022 Population and Housing Census, Zimbabwe's population stands at 15.18 million, growing at 1.5% annually.[3] The population is predominantly Shona (approximately 71%) and Ndebele (about 16%), alongside smaller groups of African, European, Asian and mixed ancestry. Christianity is the dominant religion. Zimbabwe recognises 16 official languages, with Shona and Ndebele most widely spoken and English commonly used in commerce. The country gained independence in 1980, and a new constitution was adopted in 2013.

Political Context: Zimbabwe is a multi-party democracy that holds regular elections for a bicameral Parliament comprising the Senate and the National Assembly. Parliament has 360 members: 80 in the Senate (60 elected) and 280 in the National Assembly. Following the August 2023 general elections, the Zimbabwe Electoral Commission declared Emmerson Mnangagwa of the Zimbabwe African National Union–Patriotic Front (ZANU-PF) the winner of the presidential election with 52.6% of the vote, while Nelson Chamisa of the Citizens Coalition for Change (CCC) received 44%. President Mnangagwa was sworn in for his second five-year term on 4th September 2023. The political climate has been dominated by aspirations towards devolution of power to provincial and traditional structures, home grown inclusivity models and explicit quest for international re-engagements. The pursuit of these political milestones has played out through ongoing proposed legislative amendments in various areas such as local governance laws, procurement law (see s.2.3 on procurement reforms and NDS2) and recently, councils, parliamentary and executive term changes. Zimbabwe has a strong regional cooperation stance and is an audible voice in regional and continental political affairs. Internationally, the country maintains neutrality and is guided by sovereignty and national interest ethos in its global relations.

Economic Overview: Zimbabwe is classified as a lower income country, with GDP per capita estimated at USD 2,497.[4] The economy is anchored by agriculture, which provides direct and indirect employment to 60–70% of the population, mining, which is the main source of export earnings, as well as manufacturing and tourism.[5] Real GDP growth for 2025 is projected at 8.5% (rebased GDP), up from 1.7% in 2024. On the supply side, growth was driven by a 24% expansion in agriculture.[6] Mining grew by 7.3%, reflecting continued investment in lithium and strong international prices for gold and platinum. Manufacturing (4.2%), electricity generation (6.7%) and construction (4.8%) also contributed to the recovery. On the demand side, activity was supported by consumption growth of 4.3% and investment growth of 4.9%. Exports rose by 19.9%, largely from mining and agriculture, outpacing import growth of 6.1%.

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[3] ZIMSTAT, 2022 Population and Housing Census Preliminary Results, https://zimbabwe.unfpa.org/en/publications/2022-population-and-housing-census-preliminary-results

[4] https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=ZW for 2024

[5] https://tradezimbabwe.com/key-economic-sectors/

[6] African Development Bank, Country Focus Report 2024 – Zimbabwe, https://vcda.afdb.org/en/system/files/report/zimbabwe_final_2024.pdf

Sustained monetary tightening from late 2024, together with prudent fiscal policy and active money-supply management by the Reserve Bank of Zimbabwe (RBZ), helped anchor inflation and stabilize the willing-buyer willing-seller exchange rate, which has averaged around ZiG 26.00 per USD since Q4 2024. Growing foreign exchange reserves supported RBZ interventions, narrowing the parallel market premium to about 20%, down from over 40% before the ZiG devaluation in September 2024. Monthly ZiG inflation averaged 1.2% between January 2025 and December 2025, reflecting anchored expectations and reduced exchange rate pass-through. Annual inflation declined sharply, from a peak of 95.8% in July 2025 to 15.0% in December 2025 and 3.8% in February 2026, driven by currency stability, tight monetary conditions and improved food supply.

Fiscal discipline has improved despite rising spending pressures. Since 2021, Government has implemented a cash budgeting system to align expenditures with available revenues, helping contain the fiscal deficit. The deficit is estimated to have narrowed from 1.2% of GDP in 2024 to 0.8% in 2025, supported by stronger revenue mobilisation, improved tax administration and better agricultural performance. Treasury intends to maintain fiscal consolidation to safeguard macroeconomic stability, with the deficit projected to narrow further to 0.2% of GDP in 2026.[7]

As of September 2025, Government estimates total public debt at USD 23.4 billion (51.1% of rebased GDP). The IMF Article IV Report (October 2025) similarly notes that public debt increased from 76.0% of GDP in 2023 to 78.1% in 2024, with the nominal stock reaching USD 23.3 billion. The debt portfolio comprises external debt of USD 13.6 billion (29.7% of GDP) and domestic debt of USD 9.8 billion (21.4% of GDP). With external financing constrained, Government has increasingly relied on domestic borrowing, contributing to the rise in domestic debt. The IMF–World Bank Debt Sustainability Analysis (August 2025)[8] assesses Zimbabwe as being in external and overall debt distress, driven by long standing multilateral and bilateral arrears that continue to limit access to concessional and market financing.

Growth is projected to moderate to 4.5% in 2026, reflecting persistent macroeconomic vulnerabilities. The outlook is supported by continued growth in agriculture, mining and manufacturing. However, downside risks remain elevated due to global uncertainty, rising protectionism and the suspension of U.S. development assistance. Volatile commodity prices and geopolitical tensions could weaken mineral export earnings, while reduced donor support may widen the fiscal deficit. Domestic vulnerabilities persist, including weak monetary and exchange-rate credibility, a high parallel-market premium and low reserves. Fiscal pressures also remain significant, reflected in domestic arrears. Without deeper reforms, the economy will remain highly exposed to shocks with limited policy space.

Social Context: Zimbabwe's 2025 Human Development Index ranking of 153 reflects gradual but uneven progress, highlighting resilient human capital outcomes alongside the scale of reforms required to advance toward upper middle-income status. Poverty has increased following the severe 2023/24 drought, with affected wards accounting for nearly half of the population and more than 40% of households experiencing food insecurity.[9] Income inequality remains high, with a Gini coefficient of 50.3 (2019). According to the Q2 2025 Labor Force Survey, 35.8% of employed persons were employed in the formal sector, 39.3% in the informal sector and 5.7% in households. The national unemployment rate stood at

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[7] African Development Bank, Country Focus Report 2024 – Zimbabwe, https://vcda.afdb.org/en/system/files/report/zimbabwe_final_2024.pdf

[8] https://www.elibrary.imf.org/view/journals/002/2025/282/article-A002-en.xml

[9] As of June 2024, the Total Consumption Poverty Line (TCPL) was ZiG 623.40 per person, indicating the minimum income required to meet basic needs.
ZIMSTAT, Poverty Datum Lines 2024, https://www.zimstat.co.zw/wp-content/uploads/macro/prices/PDL/2024/PDL_%20Front_06_%202024.pdf

20.7% and was 28.9% among youth aged 15–34. Health outcomes remain low. Life expectancy is estimated at 64.7 years, and the maternal mortality ratio has improved to 363 deaths per 100,000 live births (from 458 in 2017). HIV prevalence remains high at 11.6% among adults aged 15–49 (2021). Education indicators show modest gains, with average years of schooling rising to 9.0 (from 8.3 in 2021) and expected years of schooling at 12.1. Youth under 35 constitute 67.7% of the population. Gender disparities persist, with 39.4% of women reporting physical violence and 11.6% reporting sexual violence. Government continues to implement policies and programmes aimed at addressing these social challenges, with a focus on improving education, healthcare and gender equality.

Development Challenges: Zimbabwe faces multifaceted development challenges that continue to shape its socio-economic landscape. Slow structural transformation, macroeconomic instability and deep-rooted fragility remain key constraints. Underlying challenges include weak governance institutions, low value addition in key sectors and high vulnerability to external shocks. Climate change further compounds these pressures, with increasing frequency of droughts and extreme weather events. An unfavourable investment climate, persistent electricity shortages and inadequate infrastructure continue to impede private sector development.

2.2. Public procurement system

Legal and regulatory framework: Public procurement in Zimbabwe is regulated by the Public Procurement and Disposal of Public Assets Act [Chapter 22:23] (PPDPAA), which commenced on 1 January 2018.[10] The PPDPAA replaced the Zimbabwe Procurement Act (chapter 22:14) of 1999. The PPDPAA describes the institutional framework, responsibilities of procuring entities, procurement planning and methods of procurement, procedures and contract management. It includes provisions on ethical practices and provides bidders with a right to challenge and review of procurement decisions. The PPDPAA applies to all stages of the process of the procurement of goods, construction works and consultancy and non-consultancy services by procuring entities. Procuring entities are widely defined to include government ministries and departments, local authorities, provincial and metropolitan councils, parastatals and state-controlled companies/State-Owned Enterprises (SOEs)[11] as well as prescribed partnerships or joint ventures.[12]

[10] Public Procurement and Disposal of Public Assets Act [Chapter 22:23] gazetted 04 August 2017 and commenced on 1 January 2018, (as amended).

[11] Mutapa Investment Fund (MIF) (Zimbabwe's sovereign wealth fund) is exempted from the application of the PPDPAA. In February 2024, 16 MIF portfolio companies were also exempted, by Presidential Decree. During 2024 amendments were made to the PPDPAA adding provisions concerning compliance of exempted entities with the PPDPAA. According to PRAZ circular OPS/3 of 2024 (November 2024) addressed to Accounting Officers of public entities under MIF, MIF companies are required to comply with the PPDPAA for all procurements of a general nature (as opposed to procurement for commercial activities) which can be procured using normal tender procedures. MIF companies are also entitled to apply to PRAZ for exemptions from specific provisions of the PPDPAA, based on the need to operate commercial business units or in competitive markets. The Sovereign Wealth Fund Act of Zimbabwe was amended at the end of 2024 to require MIF to ensure that [public entities] establish and maintain "an appropriate procurement and provisioning system that is fair, equitable, transparent, competitive and cost-effective" supported by compliance policy and system, as well as a system for properly evaluating all major capital projects.See full analysis at 6(a)(a) of the Indicator Matrix.

[12] For full definition see PPDPAA s.2 Definition of "procuring entity". The term "State Owned Enterprise" is not used in the PPDPAA but it is included here as it is a widely used and understood internationally.

The PPDPAA provides for enactment of ministerial Regulations to support its implementation.[13] The supporting ministerial Regulations were published in 2018,[14] providing more detailed provisions on the conduct of public procurement in practice... PRAZ has also published a Procurement Manual (2019) and issues clarificatory circulars, directions and technical guidelines on an ongoing basis.

Institutional Framework: Key institutions in the procurement sphere are the Procurement Regulatory Authority of Zimbabwe, reporting to the Office of the President and Cabinet, the Ministry of Finance, Economic Development and Investment Promotion, the Procuring Entities, the Special Procurement Oversight Committee and the Review Panels.

- **Procurement Regulatory Authority of Zimbabwe (PRAZ):** PRAZ serves as the central authority in Zimbabwe's public procurement landscape. PRAZ is a statutory regulatory body established by the PPDPAA and governed by the Public Entities Corporate Governance Act. PRAZ's reporting line is direct to the Vice President responsible for Procurement and Research in the Office of the President and Cabinet (OPC). The mandate of PRAZ includes regulating and overseeing public procurement to ensure compliance with established laws and regulations and providing guidance and training to procuring entities to enhance their procurement capabilities and ensure that procurement practices promote competition, fairness, transparency, and cost-efficiency while supporting accountability, productivity, and VfM, and contributing to national socio-economic development. PRAZ oversees and regulates public procurement activities across all registered procuring entities. It also has responsibility for the eGP system. To discharge its functions, PRAZ has a staff establishment of 85 permanent staff based in its offices in Harare and Bulawayo. The organisation of staff at the CEO, Director, and Manager levels is shown in Figure 2 below.

[13] PPDPAA s.101 Regulations

[14] Public Procurement and Disposal of Public Assets (General) Regulations, 2018. Statutory Instrument 5 of 2018 (as amended)

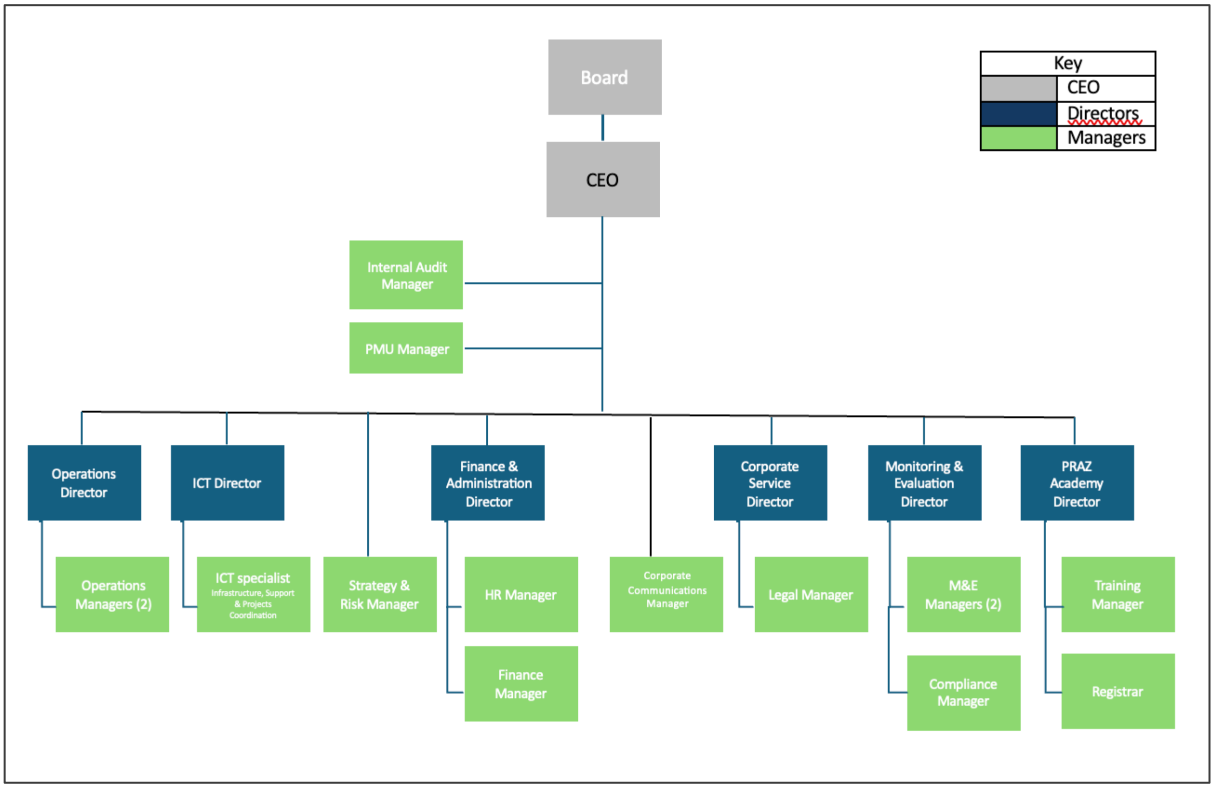

Figure 2: PRAZ Organisation - CEO, Director and Management level staff (February 2026)

- **Office of the President and Cabinet (OPC):** As noted above, PRAZ's reporting line is direct to the Vice President responsible for Procurement and Research in the OPC. The Vice-President is the Minister tasked with the administration of the PPDPAA. This includes making regulations to give the PPDPAA effect (after consultation with PRAZ and the Minister responsible for finance) and appointment of the PRAZ Board (after consultation with the President).
- **Ministry of Finance, Economic Development and Investment Promotion (MoFEDIP)**: The MoFEDIP's functions include to coordinate development of national and provincial economic development plans and production of national budgets, formulate fiscal and other policy strategies, manage and account for public resources, provide Government accounting services, manage the PFMS and oversee Ministries' internal audit controls.[15]
- **Procuring entities (PEs):** There were 372 registered procuring entities in 2025. Each PE is responsible for managing its own procurement activities[16] and must establish its own internal structures to do so, including a Procurement Management Unit (PMU) and an Evaluation Committee for each procurement above a set threshold. Responsibility for ensuring that a PE's procurement activities are carried out in compliance with the PPDPAA and any directions of PRAZ lies with the PE's accounting officer and, within their spheres of responsibility, the members of the PMU and the PE's employees and agents.

[15] https://zimtreasury.co.zw/about-us/ accessed 07 March 2026.
[16] Subject to prescribed authorised thresholds.

- **Special Procurement Oversight Committee (SPOC):** The SPOC is a high-level body specifically constituted pursuant to s.54 PPDPAA[17] to scrutinize procurement contracts that are considered "especially sensitive" or "especially valuable". This committee is composed of the Attorney-General, who serves as the Chairperson, the Accountant-General, and the Principal Director of Public Works, or their authorised delegates. Its core role is to review the proposed award of these significant contracts to ensure that all legal processes were followed and the objectives of the PPDPAA are met. SPOC has the authority to certify an award, recommend corrective actions, cancel the proceedings and order them to be recommenced, or direct PRAZ to initiate an investigation. SPOC also reviews the establishment of framework agreements. PRAZ provides secretariat support to the SPOC.
- **Review panels:** PPDPAA provides for the appointment of an ad-hoc review panel to investigate and hear applications for review of procurement proceedings by a bidder, following an initial challenge submitted direct to a procuring entity.[18] Review panels are set up by PRAZ on an ad-hoc basis in response to an application for review. A Review panel consists of at least 3 members, drawn from one or more lists of panellists, which includes legal practitioners and individuals with procurement expertise. There is a right to appeal against a Review panel decision to the Administrative Court. PRAZ provides secretariat support to the Review Panels.

Impact of periods of macro-fiscal instability on the procurement system: The Economic Overview at section 2.1 above reports the positive impact of sustained monetary tightening from late 2024 onwards. This has helped to anchor inflation and stabilize currency exchange rates in Zimbabwe. That overview also references ongoing improvements in fiscal discipline to safeguard macroeconomic stability. As part of efforts to improve macroeconomic stability, in April 2024 the Reserve Bank of Zimbabwe announced a major currency switch, introducing a new gold-backed currency called Zimbabwe Gold (ZiG) to replace the rapidly depreciating Zimbabwean dollar (ZWL). The ZiG became the official currency on 08 April 2024.

Prior to 2024, during the data period used for this MAPS Assessment (2022-2025) Zimbabwe experienced macro-fiscal instability, with high inflation and rapid exchange rate fluctuations. These factors, together with the currency switch and continued use of a multi-currency system (in practice, use of USD and ZiG) presented significant practical challenges for procuring entities and suppliers, examples of which are provided below. These factors also help to explain some of the limitations on available public finance management data reported at Indicator 4 and the way in which some of the expenditure data is presented at Indicators 7 and 10.

The MAPS Assessment team heard from procuring entities, suppliers and other stakeholders about the practical consequences of recent periods of macro-fiscal instability on the operation of public procurement market. Some examples are provided below:

- **Shortened tender validity periods**: In periods of particularly high and hyper-inflation suppliers are unwilling and/or unable to offer and maintain fixed tendered prices for long due to inflationary impact on their costs. In some cases, procuring entities were under pressure to make procurement decisions quickly in order to issue binding contracts to manage the risk of price changes, compromising the efficacy of the evaluation process and outcomes of the procurement. In 2024, the Operations Division of PRAZ granted a number of exemptions to procuring entities to shorten statutory bidding periods to manage the risk of exchange rate fluctuations.[19]

[17] PPDPAA s.54 Special Oversight Committee for certain especially sensitive or especially valuable contracts.
[18] PPDPAA s.75 Appointment of review panels and ss.73 to 77 more generally.
[19] PRAZ Annual Report 2024, page 31, 8.1.6 Exemptions.

- **Short deliveries:** In periods of particularly high and hyper-inflation, there were examples of delivery of a reduced number of items for the total tendered price, where the cost to supplier of the number of items originally tendered exceeded the total tendered price by the time of delivery.
- **Price hedging:** Suppliers engaged in price hedging in response to fiscal risk exposure due to inflation, currency changes and significant delays in payment for Government contracts.
- **Post-contract value-for-money reviews:** MDAs have used post contract value-for-money assessments leading to demands for price reduction even after delivery where tendered prices are regarded as excessive.[20]
- **Exchange rate risks:** The multi-currency system exposes both purchasers and suppliers to exchange rate risk. Bids can be submitted in either USD or ZiG, but payment is in ZiG (save where specifically provided otherwise). Currency conversion for payment is effected on the day of payment (not the date of invoice) using the official bank exchange rate. Suppliers reliant on imported goods or services were particularly exposed to exchange rate fluctuations.
- **Supply-side jeopardy:** Procuring entities experienced challenges and delays with contractors on currency issues[21] and non-availability of local currency resulted in supply issues, due to inability of supplier to pay their local supply chain in local currency.
- **Barriers to obtaining finance:** Significant delays in payment under government contracts to suppliers has had a negative impact on suppliers' ability to obtain finance (see analysis at 1(a)(b) Barriers to entry, 4(b)(b) & 9(c)(c) Processing of invoices and payment).

The currency switch in April 2024, part way through the fiscal year, had an impact on financial reporting and reliability of PFM data in the 2024 fiscal year. The reporting currency for 2024 financial statements was the ZiG, and this meant translating ZWL transactions to ZiG. This created financial reporting challenges for some procuring entities and raised audit issues.[22] PRAZ reporting templates and quarterly reports also had to be realigned to ZiG. Expenditure is converted into USD for some reporting purposes. Contracts that spanned the conversion date required administrative adjustments.

There was also reduced transparency and reliability in terms of public finance management data for the 2024 fiscal year. There was almost five months down time of the Public Finance Management System (PFMS) during the country changeover of currency (April to August 2024). According to the Auditor-General, during that time most MDAs operated outside the PFMS resulting in unreliability data for that period.[23]

2.3. Public procurement reform, eGP system and National Development Strategy

The Government of Zimbabwe has an ongoing procurement reform agenda, with significant enhancements introduced over the past 10 years including the new public procurement law with

[20] NDS2 at paragraph 279 states as follows "Contract renegotiation will be considered in cases where terms are unsustainable, or delivery was made outside approved budget provisions" flagging this as continued practice.

[21] Report of Auditor-General Report for the Year Ended December 31, 2024, on State Owned Enterprises and Parietals refers to examples of problems arising due to currency issues.

[22] For example, Summary of Auditor-General Report for the Year Ended December 31, 2024, page 2, referencing repeated withdrawal and re-submission of financial statements during audit, in some cases.

[23] Summary of Auditor-General Report for the Year Ended December 31, 2024, page 3: "the financial information that would have been processed outside the system was not uploaded onto the system in some cases. Such information would misstate expenditure figures"

supporting regulations in 2018/2019, institutional changes including the establishment of PRAZ to serve as the central authority in Zimbabwe's public procurement landscape and the introduction and roll out of the eGP system in 2024/2025.

Legal and regulatory reforms: On 6 June 2025, a Bill with proposed amendments to the PPDPAA was published with the Government of Zimbabwe Gazette.[24] [25] Proposed amendments in the draft Bill include: clarificatory changes; updated and new definitions; reduction in timeframes for challenging a procurement process; transparency provisions on award through direct procurement, and; enhanced requirements on good conduct of bidders and contractors. There are also proposed expanded or amended provisions on non-disclosure of information on procurement for the purposes of defence or public security, domestic preference and making of Regulations as well as new provisions providing for the appointment of a Corporate Secretary to PRAZ. (This list is not exhaustive). The MAPS Assessment team reviewed the draft Bill for the purposes of establishing whether provisions in that Bill resolve any of the Gaps under Pillar I and Indicator 13 recommending legislative changes. The MAPS Assessment team concluded that the version of the Bill reviewed does not address the Gaps identified. The Bill is proceeding through the Parliamentary process, with public hearings conducted at the end of 2025 and a second reading in Parliament on 17 February 2026. There are no definite timelines for final approval and adoption.

Other ongoing and planned developments in the legal and regulatory framework include:

- New/amending regulations: PPDPA (Compliance, Monitoring and Evaluation) Regulations; PPDPA (Professionalisation and Licensing) Regulations, and; PPDPA (General) (Amendment) Regulations, to include eGP provisions. At the date of this report (February 2026) these draft Regulations were not publicly available.
- Sustainable Public Procurement guidelines: In the context of sustainable public procurement, both affirmative procurement guidelines (domestic preference) and sustainable procurement guidelines are being prepared.
- Review of public procurement templates through a World Bank African Legal Support Facility (ALSF Grant).

eGP System: The eGP system was officially launched by the Head of State in October 2023. Onboarding of procuring entities and registration of suppliers commenced in January 2024 and progressed at a rapid pace. The eGP implementation did not include a pilot phase; instead, it moved directly into a phased rollout from January 2024 to April 2025. See Figure 3 below

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[24] General Notice 1137 of 2025 of publication of Public Procurement and Disposal of Public Assets Amendment Bill (H.B. 2 of 2025). Government Gazette, 6th June 2025.p.2280 General Notice 1137 of 2025. https://gazettes.africa/akn/zw/officialGazette/government-gazette/2025-06-06/41/eng@2025-06-06

[25] Link to draft Bill https://www.veritaszim.net/sites/veritas_d/files/Public%20Procuremt%20%26%20Disposal%20of%20Public%20Assets%20Bill%20%28HB%202%2C2025%29.pdf

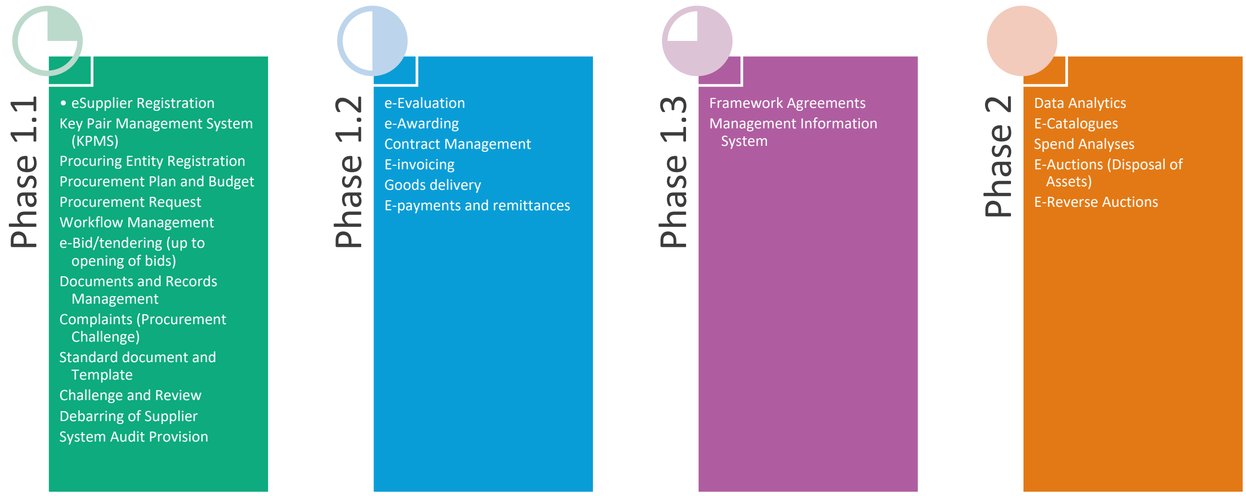

Figure 3: eGP implementation phases

Source: PRAZ Annual Report and eGP team

Phase 1.1, implemented in January 2024, introduced electronic registration of suppliers and procuring entities, as well as the e-bidding module. Phase 1.2, completed in February 2025, added e-evaluation, e-award, and contract management modules. Phase 1.3, went live in February 2025, introducing framework agreements and enhanced reporting functionalities. Phase 2 with data analytics, e-catalogues, and e-auctions was completed in April 2025.

The transition from paper-based procurement to end-to-end use of eGP is ongoing. In practice, although all planned eGP implementation phases are now rolled out, not all modules are fully utilised or universally applied. Electronic registration of procuring entities and registered suppliers commenced in January 2024. In 2025 there were 416 procuring entities[26] [27] and 12,191 suppliers on the eGP system.[28] In 2025, Annual Procurement Plans were published on the eGP system by 90% of authorised procuring entities. The e-bidding module (from advertisement up to opening of bids) is widely used, with 26947 notices inviting bids published in 2025. Use of the e-evaluation, e-award and contract management modules remain very low compared to the e-bidding module. Procurement processes are still largely conducted offline beyond the bidding stage. PRAZ is aware of this issue and is actively working on remediation actions.

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[26] It is important to note in this context that "enrolment" on the eGP system is not the same as official registration with PRAZ as an authorised procuring entity (i.e. authorised to conduct procurement and reporting to PRAZ) or as a registered supplier. Thus, for example, in 2025, primarily due to confusion on the part of some departments or units of larger procuring entities who enrolled separately, there were 414 enrolled procuring entities on the eGP system, but PRAZ authorised 372 procuring entities. Similarly, the number of enrolled suppliers exceeds the number of officially registered suppliers.

[27]Based on eGP Procuring entities registration Infographics : See footnote above and analysis at 7(a)(c) flags which inconsistencies between PEs list on eGP vs list of PEs authorised by PRAZ https://egp.praz.org.zw/egp-QWdlbmN5R3JhcGhpY3MvcmVnaXN0ZXJfYWdlbmNpZXNfZ3Jvd3Ro

[28] Based on eGP Supplier Registration Infographics: See footnote above and analysis at 7(a)(b) which flags inconsistency between published eGP data and figures available through the Government Gazette. https://egp.praz.org.zw/egp-QW5hbHl0aWNzTWVyY2hhbnRHcmFwaGljcy9tZXJjaGFudF9ncmFwaGljc19ncmlk

The recent and phased rollout of eGP means that there was limited data available from the eGP system to support the quantitative analysis in this assessment. The MAPS Assessment team thus relied primarily on data collected by PRAZ in its well-established monitoring and evaluation role.

National Development Strategy 2 2026-2030 [29] (NDS2) is Zimbabwe's second five-year plan towards the realisation of Vision 2030 through the transformation of the economy to a "Prosperous and Empowered Upper Middle-Income Society." NDS2 focusses on ten national priority areas aligned with regional, continental and global frameworks, namely the SADC Regional Indicative Strategic Development Plan 202-2030, the African Union Agenda 2063 *The Africa We Want* and the United Nations Sustainable Development Goals (SDGs) 2015-2030.[30]

Public procurement is identified as a vital strategic lever in delivering the objectives of NDS2, primarily by leveraging the Government's role as the single largest buyer of goods and services in Zimbabwe. NDS2 provides for strategic use of public procurement to support local value chains and promote use of local content thresholds. It includes proposals for inclusive procurement strategies and support for micro, small and medium enterprises, economic empowerment and enhanced participation in public procurement supply chains of youth and women. Public procurement is also identified as a tool for promotion of domestic currency, improving public finance management and to facilitate ease of doing business. Continued use of eGP is recognised as a critical part of the digitalisation and eGovernment agenda, to improve efficiency, effectiveness and transparency of Government operation.

2.4. Stakeholder mapping

In addition to the key institutions and procuring entities referred to at 2.2 above, other stakeholders who influence the operating environment of public procurement and with whom the MAPS Assessment team engaged, are mapped at 4 below.

[29] NDS2: Republic of Zimbabwe, National Development Strategy 2, January 2026 – December 2030, 27 November 2025.

[30] NDS2 Table 1 shows alignment of NDS2 National priorities to Regional Indicative Strategic Development Plan 202-2030, the African Union Agenda 2063 and the United Nations Sustainable Development Goals (SDGs) 2015-2030. NDS2 integrates the Six Transitions identified by the UN as critical accelerators for achievement of SDGs by 2030.

Figure 4: Mapping of other stakeholders

The note below provides information on the roles/activities of these stakeholders and flags, for the purposes of this MAPS Assessment, examples of ways in which these stakeholders are involved in and may influence the public procurement system.

- **Audit and Finance:** Section 309 of the Constitution of Zimbabwe mandates the Office of the Auditor-General to audit the accounts, financial systems and financial management of all departments, institutions and agencies of government and all provincial and metropolitan councils and local authorities. The Accountant General initiates, formulates and coordinates the implementation of policies regarding the management of public funds and provides guidance in the interpretation of Government policy decisions on the control of public funds.[31] The Central Internal Audit Unit (CIAU) housed under the MoFEDIP was established in 2020 to provide support in the governance and activities of internal audit and audit committees. These three stakeholders thus have a critical part to play in ensuring effective control and audit through systems and a control framework, which has a

[31] https://zimtreasury.co.zw/accountant-general-directorate/

day-to-day impact on the conduct of public procurement. Auditors are also able to provide valuable insights into how public procurement is conducted in practice and whether delivery of services to citizens is achieved in the most economic, efficient and effective manner.

- **Ethics and anti-corruption:** Sections 254 to 257 of the Constitution of Zimbabwe provides for the establishment and composition of the Zimbabwe Anti-Corruption Commission (ZACC). The functions and powers of ZACC include: investigation of corruption in the public and private sectors, including in public procurement; referral of suspected incidents of corruption to the police and National Prosecuting Authority (NPA); the receipt and consideration of complaints from the public, including those relating to public procurement; public education and engagement; assistance in the formulation of practices, systems and procurement procedures, and; making recommendations to the Government on measures to enhance integrity and accountability and prevent improper conduct in the public and private sector. ZACC also interacts with auditors as part of the overall control framework. The NPA is established under S.258 of the Constitution of Zimbabwe and is responsible for prosecuting crimes, including procurement-related corruption, on behalf of the state and seizure and recovery of proceeds of crime. ZACC and NPA thus have a key role in the oversight, enforcement and accountability with particular focus on anti-corruption issues which have a significant impact on the perception and practice of public procurement.
- **Corporate Governance Unit, Office of the President and Cabinet:** Many procuring entities also fall within the definition of a "public entity" for the purposes of the Public Entities Corporate Governance Act (PECOG) and thus are subject to corporate governance, audit, transparency, ethical and other requirements set out in PECOG. To assist general understanding for the purposes of this MAPS assessment, both legislative regimes commonly apply to state Commissions, parastatals[32] and to companies owned or controlled by the State.[33] [34] PECOG confirms the functions of the Corporate Governance Unit including providing and advisory and support mechanism for line ministries to ensure strict compliance by public entities with the provisions of the Act and advisory functions relating to employee performance issues. The role and activities of the CGU are thus highly relevant to the operation of procuring entities which are also public entities for the purposes of PECOG.
- **Office of the Attorney-General:** Core activities of the Office of the Attorney-General include: acting as the principal legal advisor to Government; representing Government in civil and constitutional proceeding, and; drafting legislation.[35] In the context of public procurement, the Office of the Attorney-General prepared the proposed amendments to the PPDPPAA, including engaging with stakeholders as part of that process, and is working on draft Regulations. The Office of the Attorney General thus delivers an important role in the development and delivery of the procurement legislative framework. The Attorney-General chairs the Special Procurement Oversight Committee (SPOC), and the office of the Attorney-General is represented on procurement debarment committees.
- **Professionalisation, education, training and research:** Stakeholders involved in professionalisation, education and training include universities, private professional training providers and professional bodies, such as the Chartered Institute of Procurement and Supply (CIPS). These organisations are essential to build and maintain capacity and develop and improve the public procurement system.

[32] A corporate body established by or in terms of any Act for special purposes laid down in that Act.

[33] Coverage needs to be assessed on a case-by-case basis by reference to definitions in the legislation which are not fully aligned, see PECOG s.2 Interpretation and PPDPAA s.2 Interpretation.

[34] Joint ventures and partnerships between the State and other persons may also fall within the coverage of both regimes, where definitions are met.

[35] https://www.attorneygeneral.org.zw/about-overview

Academic research also provides extremely valuable insight into procurement in practice and assists in identifying areas for improvement.

- **Public Service Commission:** Procurement professionals within MDAs are public servants appointed by the Public Service Commission which is also responsible for their examination and promotion as well as complaints and disciplinary matters. The role and responsibilities of the Public Service Commission are thus relevant to the procurement professionalisation agenda.
- **Private Sector:** Engagement with private sector stakeholders including sector specific and representatives of MSMEs and minority and women owned businesses brings a unique perspective to the understanding of operation of the procurement system in practice as well as valuable suggestions and input for proposals for improvements and reform.
- **Oversight and accountability:** Civil society organisations and their members can provide independent citizen-led perspectives on the operation of the procurement system in practice and on proposals for improvements and reform. The legal community is able to provide insight into the legislative process, observations on how the legal and regulatory framework is interpreted and areas for improvement as well as sharing experiences of representing the business community in contractual matters and procurement challenges. Media institutions, including newspapers, television, radio and social media, have potential to facilitate public procurement oversight and influence public opinion including through active reporting of on instances of lapses in procurement or alleged misuse of public funds, as well as promoting public debate.

3. Assessment

This section contains the results of the assessment presented in a synthetic manner. This means that the results (strengths, weaknesses, recommendations) are described synthetically at the level of indicators. A further synthesis at the level of the four pillars is found in the Executive Summary, while the detailed results of all sub-indicators and their assessment criteria are found in the Indicator Matrix.

3.1. Pillar I - Legal, Regulatory and Policy Framework

Pillar I assesses the existing legal, regulatory and policy framework for public procurement. It identifies the formal rules and procedures governing public procurement and evaluates how they compare to international standards. The practical implementation and operation of this framework is the subject of Pillars II and III. The indicators within Pillar I embrace recent developments and innovations that have been increasingly employed to make public procurement more efficient. Pillar I also consider international obligations and national policy objectives to ensure that public procurement lives up to its important strategic role and contributes to sustainability.

Indicator 1. The public procurement legal framework achieves the agreed principles and complies with applicable obligations

The indicator covers the different legal and regulatory instruments established at varying levels, from the highest level (national law, act, regulation, decree, etc.) to detailed regulation, procedures and bidding documents formally in use.

Synthesis of the indicator

The Zimbabwean procurement system is built on a well recorded and organised legal hierarchy, primarily governed by the Public Procurement and Disposal of Public Assets Act[36] (PPDPAA). Further details are set out in secondary legislation in the form of PPDPA Regulations[37] and supported by circulars and technical guidance issued by the Procurement Regulatory Authority of Zimbabwe (PRAZ). The PPDPAA is applicable to all stages of the process of the procurement of goods, construction works, and services (consultancy and non-consultancy) by procuring entities. PPPs are regulated by the Zimbabwe Investment and Development Agency (ZIDA) Act, with the Public-Private Partnership Unit of ZIDA responsible for PPP regulatory policy making.

Procurement methods and associated conditions and financial thresholds for their use are prescribed in the PPDPAA. Methods include competitive and less competitive methods, two stage tendering as well as simpler methods for low value procurements, ensuring an appropriate range of options and fractioning (division) of contracts to limit competition is prohibited. Provisions in the legal framework in theory restrict discretion and thus opportunities for selection of less competitive procurement methods. However, in practice, the use of less and non-competitive procurement methods is high pointing towards over-use of permitted exceptions from competitive bidding, reducing transparency and trust in the procurement system as a whole, negatively impacting opportunities for competition and development of competitive markets and jeopardising value for money outcomes. This indicates a need to review those legal provisions to ensure that they are fit for purpose and to make necessary amendments to clearly define the exceptional circumstances where direct procurement is permitted.

The legal framework requires public advertisement of procurement opportunities in the Zimbabwe Government Gazette, and at least one newspaper of wide circulation or on the internet and the PRAZ website. The content of bid notices is sufficiently informative for bidders and there are appropriate timelines between publication and response to bid notices The PPDPAA and PPDPA Regulations do not, however, provide for or regulate the online publication of procurement opportunities using the eGP system and there is currently an inefficient parallel system in operation requiring advertisement on both eGP and in the Gazette (at cost). This needs to be resolved from both a practical and legal perspective to ensure comprehensive use of eGP on a legally certain basis. Other instances where there is need to better align the legal framework with changing practices driven by rollout of the eGP system include the procedures for and recording of submission, receipt and opening tenders, legal provisions to authorise the use of procurement tools such as e-reverse auctions and e-catalogues, as well as publication of award notices.

Provisions on eligibility and qualification of interested parties are set out in the PPDPAA together with grounds for exclusion and there is an appropriate system in operation for administrative debarment of contractors. There are, however, barriers for potential suppliers wishing to participate in the public procurement marketplace including challenges in accessing both government and private finance and fees payable by suppliers both to register and participate in procurement processes. Some of these fees were reduced in January 2026 and differential fees were introduced for micro, small and medium enterprises. This is a welcome development, the impact of which should be kept under review.

There are no rules of comprehensive application for participation of state-owned enterprises as bidders in public procurement processes. As an initial step it is recommended that all standard bidding documents

[36] Public Procurement and Disposal of Public Assets Act [Chapter 22:23], 01 January 2018, as amended. https://zimlii.org/akn/zw/act/2017/5/eng@2020-02-07

[37] Public Procurement and Disposal of Public Assets (General) Regulations, 2018 Statutory Instrument No.5 of 2018, as amended.

include relevant provisions to promote fair competition, with measures embedded in the legal framework in the longer term. Also in the longer term, data from the eGP system should facilitate analysis of the level and impact of SOE participation in the public procurement market.

The minimum content of bidding documents is regulated to ensure that information is relevant and sufficient for suppliers to understand, assess and respond to the opportunity offered. According to the legal framework, specifications should be neutral and functional, where appropriate, with relevant international standards used and the principle of equivalence applied. Suppliers may request clarification of bidding documents, with responses communicated to all bidders. The PPDPAA and PPDPA Regulations require use of objective evaluation criteria relevant to the subject matter of the contract which must be prescribed in the bidding documents together with the evaluation methodology to be applied. There are provisions in the legal framework for use of criteria in addition to price including life-cycle costing and quality is a major consideration in evaluating proposals for consulting services. Confidentiality must be respected during the evaluation process and until after award of the contract and there are measures to protect bidders' proprietary and commercially sensitive information.

Procuring entities are responsible for contract management, including contract amendments, to procuring entities and there is a process for reporting on contract management to PRAZ. Not all General Conditions of Contract contain a dispute settlement clause, and this should be remedied to improve clarity and efficiency of the dispute resolution process. Court decisions on contract disputes are enforceable, and legislation allows for arbitration and enforcement of awards.

The legal framework includes appropriate provisions requiring procuring entities to maintain and retain comprehensive procurement files but there are no established security protocols to protect physical records or measures to ensure compliance with appropriate standards for record keeping. Instances of poor record keeping are addressed under indicator 9.

The PPDPAA grants participants in procurement proceedings the right to challenge decisions or actions by procuring entities by means of a challenge submitted to the procuring entity. There is a subsequent right to apply for review by an independent Review Panel and onward appeal to the courts. PRAZ also offers an informal complaints resolution process (see Suggestions for improvement below). Further analysis, Gaps and Recommendations on the system for challenge and review are presented at Indicator 13.

Summary of high risk gaps and recommendations of Indicator 1

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for the Red flag (where relevant), and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 1(b)		
Over-use of exceptions permitting direct procurement in S.33(2) of the PPDPAA: Despite laws prioritising competitive bidding, levels of direct procurement remain high. **Potential misuse of exceptions:** Provisions allowing additional goods and services up to 50% of an original contract are overly generous and open to potential abuse.		**A general review of S.33(2) of the PPDPAA is recommended** to evaluate its fitness for purpose, with specific recommendations to consider: **Restricting Exceptions:** Amend S.33 to ensure direct procurement is limited to clearly exceptional circumstances and requires documented justifications for its use.

Vague definitions: Uncertainty exists regarding the use of "extreme urgency" and "exceptionally advantageous" exceptions due to a lack of clear definitions. **Low bidder confidence:** Only 12% of private sector survey respondents believe procurement methods are appropriately aligned with the risk and value of a project. Overusing direct procurement reduces transparency and trust while hindering competition for current and new market entrants and jeopardising value for money outcomes.		**Lower permitted percentage for direct award of additional goods and services:** Reduce the allowed percentage of additional goods and services that can be procured without competitive bidding to prevent potential abuse. **Define Terms:** Establish clear definitions for "extreme urgency" and "exceptionally advantageous conditions" to strictly limit when these justifications can be applied.
Sub-indicator 1(d)		
Barriers to participation in the public procurement market		
Financing Constraints: A lack of accessible government financing and difficult-to-meet funding conditions prohibit many bidders, particularly MSMEs, from participating	▶	**Improve Access to Finance:** Implement accessible funding with realistic conditions for MSMEs in particular and publicise these opportunities widely.
Prohibitive Fees: High costs for registration and participation create financial hurdles which may reduce levels of participation. **International Entry Barriers:** Fees for international bidders are exponentially higher than for domestic ones, hindering fair international participation.		**Monitor and Publicise Fee Changes:** Actively engage MSMEs regarding reduced fee schedules. Track data on registration and contract awards to evaluate the impact on competition. **Reduce International Costs:** Consider lowering participation costs for international bidders to remove barriers and induce fairer competition.
Sub-indicator 1(j)		
Legislative provisions lagging behind eGP roll-out and not aligned In the absence of a provision specifically enabling the use of the eGP system, clear legal authority is compromised, subjecting actions under the eGP system to legal challenge.		**Enact Legal Authority:** Establish a general enabling provision in primary legislation and mandate that PEs use the eGP system as it is phased in. **Maintain Agile Rulemaking:** Use legally binding instructions for implementation rules to allow for speedy updates and prevent gaps between rules and practice during the rollout. **Manage Transition:** Utilise circulars to provide transitional rules for parallel paper-based processes, ensuring legal certainty and fair access. **Regular Review:** Periodically evaluate enabling provisions to ensure they remain fit for purpose as technology and practices evolve.

Suggestions for improvement The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below: *Please see the Indicator Matrix for full wording of the suggestions for improvement.*
Sub-indicator 1(d)
Publication of debarment decisions: Consider publishing debarment decisions or summaries of decisions to enhance transparency and increase confidence in the debarment system. **Eligibility requirements:** Include specific provisions listing grounds for ineligibility due to conviction by final judgment for specified organised crime, terrorist and trafficking offences (participation in a criminal organisation; terrorist offences or offences linked to terrorist activities, or inciting or aiding or abetting or attempting to commit such an offence; money laundering or terrorist financing; child labour; and all forms of trafficking in human beings.)
Sub-indicator 1(h)
PRAZ Informal complaints resolution process: Publicise information about the informal complaints resolution process, including on PRAZ's website and social media. Include information so that all potential complainants (including bidders who may wish to use this process) clearly understand who may complain, how to make a complaint, how the complaint will be handled, timelines for resolution of a complaint, the nature of the resolution of the complaint in terms of its binding effectiveness, impact of the process on formal right to challenge and review and publication of information on resolution to ensure the process remains transparent.
Sub-indicator 1(i)
Reporting to PRAZ: Publish a circular setting out the time limits and frequency with which reports should be submitted by PEs to PRAZ to ensure compliance with R.64.
Sub-indicator 1(j)
As the entire eGP process is implemented in practice, guidelines or manuals with further instructions as to which parts of the process will be managed electronically should be published.

Indicator 2. Implementing regulations and tools support the legal framework

This indicator verifies the existence, availability and quality of implementing regulations, operational procedures, handbooks, model procurement documentation and standard conditions of contract. Ideally the higher-level legislation provides the framework of principles and policies that govern public procurement. Lower-level regulations and more detailed instruments supplement the law, make it operational and indicate how to apply the law to specific circumstances.

Synthesis of the indicator

The Public Procurement and Disposal of Public Assets (General) Regulations][38] were published in 2018. Responsibility for the PPDPA Regulations is assigned to the Minister of Finance after consultation with PRAZ. These comprehensive, consolidated regulations supplement and detail the provisions of the PPDPAA. There are further subordinate instructions and circulars that include directives which provide additional operational instructions and details for implementing the PPDPAA. In order to increase transparency and understanding, the PPDPA Regulations should, ideally, be published on the PRAZ website as part of a full and up-to-date collection of legal and regulatory documents governing the procurement framework. The PPDPA Regulations will need to be included within the legislative review and update recommended at Indicator 1, to ensure they better align with the use and rollout of the eGP system. The PRAZ Public Procurement Guidelines manual was issued in 2019, providing step-by-step instructions for each stage of the procurement process. As of December 2025, PRAZ is reviewing the Guidelines including to update terminology and reflect the use and rollout of eGP.

There are standard bidding documents mandated for use by all procuring entities for the procurement of goods, works, services and non-consulting services, with minimum content regulated. PRAZ is responsible for preparing and updating standard documents and templates, and a review is recommended. There are standard contract conditions, but their use is not mandated, raising the risk of the use of inappropriate or incomplete contract terms and potential subsequent legal disputes. The system would benefit from additional standard contract conditions, including for specialised procurement such as ICT and the health sector and short-form standard conditions for low-value, low-risk contracts. The introduction of additional standard conditions should be supported by the publication of guidelines and also the provision of training on the content and coverage, as well as the appropriate choice of contract.

Suggestions for improvement The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below: *Please see the Indicator Matrix for full wording of the suggestions for improvement.*
Sub-indicator 2(c)
• Mandate the use of standard conditions of contract published by PRAZ or confirmed for use by PRAZ (in the case of international contracts or standards). • Create standard forms of contract for specialised procurement such as for health goods and services and ICT. • Consider short-form contract standard conditions for low value, low risk contracts, underpinned by a requirement to document reasons for the use of the contract type other than one of the standard GCCs. • As additional GCCs for specialised procurement are created, the use of these and short-form contracts should be supported by guidelines and training on the content and coverage as well as the appropriate choice of contract.
Sub-indicator 2(d)
Fully align terminology used in the PRAZ Public Procurement Guidelines (manual) to that used in the legislation and to reflect the use of eGP.

[38] Public Procurement and Disposal of Public Assets (General) Regulations, 2018 Statutory Instrument No.5 of 2018, as amended.
Original: https://www.veritaszim.net/node/3395

Indicator 3. The legal and policy frameworks support the sustainable development of the country and the implementation of international obligations

This indicator assesses whether horizontal policy objectives, such as goals aiming at increased sustainability, support for certain groups in society, etc., and obligations deriving from international agreements, are consistently and coherently reflected in the legal framework, i.e. whether the legal framework is coherent with the higher policy objectives of the country.

Synthesis of the indicator

Sustainable public procurement: Zimbabwe adopted 11 of the 17 United Nations Sustainable Development Goals[39] (SDGs) in 2016. Progress has been made in some of the goals and significant work is needed in others.[40] Zimbabwe's second five-year plan, National Development Strategy 2 2026-2030 [41] (NDS2) focusses on ten national priority areas aligned with regional, continental and global frameworks including SDGs, ensuring that Zimbabwe's development agenda contributes to the attainment of its international commitments under the 2030 Agenda for Sustainable Development.

The legal and regulatory framework allows for sustainability to be incorporated throughout the procurement cycle and includes specific provisions for sustainability in bid invitations and bid evaluation. There are currently no implementation rules for these provisions and sampled procurement files did not show evidence of sustainability considerations embedded in the procurement cycle (See Indicator 9). As of December 2025, a consultative process is underway to create guidelines for PEs on sustainable procurement. Concurrent with the sustainable procurement guidelines, an affirmative procurement guideline is being drafted and is targeted at including marginalised groups in Zimbabwean public procurement. However, there is no procurement specific policy/strategy and action plan to implement sustainable public procurement and aligning with broader national policy objectives.

Obligations deriving from binding international trade agreements:[42] Zimbabwe is a member of the World Trade Organization but not a signatory to or observer of the WTO Agreement on Government Procurement (GPA). It is an active member of the Southern Africa Development Community (SADC) and

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[39] NDS2 Table 1 shows alignment of NDS2 National priorities to Regional Indicative Strategic Development Plan 202-2030, the African Union Agenda 2063 and the United Nations Sustainable Development Goals (SDGs) 2015-2030. NDS2 integrates the Six Transitions identified by the UN as critical accelerators for achievement of SDGs by 2030.

[40] See Zimbabwe UN Sustainable Development Cooperation Framework 2022-2026 https://zimbabwe.un.org/sites/default/files/2021-10/2022-2026%20ZUNSDCF_Final.pdf that notes some progress in the areas of gender equality, great environmental stability and food systems, some economic growth and more accountable institutions and systems of law.

[41] NDS2: Republic of Zimbabwe, National Development Strategy 2, January 2026 – December 2030, 27 November 2025.

[42] An international treaty does not become part of domestic law in Zimbabwe unless incorporated by an Act of Parliament, although the Constitution provides for exceptions allowing the Executive to enter into binding international agreements (s.327 of the Constitution). S.34 of the Constitution require that the State must ensure that all international conventions, treaties and agreements to which Zimbabwe is a party are incorporated into domestic law.

joined the African Continental Free Trade Area (AfCFTA) in 2020. It is party to a number of bilateral trade agreements as well as the Interim Economic Partnership Agreement (iEPA) with the European Union. Zimbabwe is also a member of COMESA (Common Market for Eastern and Southern Africa) which has a specific set of Regulations concerning harmonisation of public procurement, issued pursuant to the COMESA Treaty.

S.3(2) of the PPDPAA provides that to the extent that the PPDPAA conflicts with an obligation arising out of any convention, treaty or agreement, the convention, treaty or agreement shall prevail. However, no further reference is made to incorporation of obligations arising from international agreements into the Zimbabwean procurement legal/regulatory framework. No operational guidance is provided to procuring entities to enable them to understand, implement and comply with the obligations arising from binding international agreements.

Summary of high risk gaps and recommendations of Indicator 3

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 3(a)		
No sustainable public procurement (SPP) policy/strategy and implementation plan **Absence of SPP Framework:** There is currently no policy, strategy, or implementation plan in place to facilitate sustainable public procurement in support of broader national policy objectives and priorities. **Lack of Implementation Rules:** Although some provisions allow for sustainability, the absence of specific implementation rules prevents it from being integrated into the procurement cycle.	►	**Develop National Sustainable Public Procurement (SPP) Policy/Strategy:** Create a comprehensive SPP policy/strategy and implementation roadmap aligned with national economic, environmental, and social priorities set out in NDS2. **Legal Alignment:** Identify and implement necessary amendments to the legal and regulatory framework to support sustainability throughout the procurement lifecycle. **Operationalise SPP:** Embed sustainability requirements into standard tender documents, contract conditions, and practical implementation guidelines.
Improvements required to better integrate public procurement obligations derived from internal binding international trade agreements **Inadequate Legal Integration:** International obligations are not fully reflected in the procurement framework **Lack of Operational Guidance:** Procuring entities receive no instructions or guidance on	►	**Legislate Compliance:** Add an enabling provision to the PPDPAA that mandates compliance with international agreements and refers to specific implementation guidance. **Provide Operational Guidance:** Update the PRAZ Procurement Manual and other policies with detailed instructions to help PEs consistently meet international obligations. **Standardise Documentation:** Incorporate references to international agreements in

how to understand and implement obligations derived from international agreements.		Standard Bidding Documents (SBDs) and other model materials to ensure users are familiar with and adhere to their obligations

3.2. Pillar II - Institutional Framework and Management Capacity

Pillar II assesses how the procurement system defined by the legal and regulatory framework in a country is operating in practice, through the institutions and management systems that make up overall governance in its public sector.

Pillar II evaluates how effective the procurement system is in discharging the obligations prescribed in the law, without gaps or overlaps. It assesses: i) whether it is adequately linked with the country's public finance management system; ii) whether institutions are in place in charge of necessary functions; and iii) whether the managerial and technical capacities are adequate to undertake efficient and transparent public procurement processes.

Indicator 4. The public procurement system is mainstreamed and well-integrated with the public financial management system

This indicator focuses on how well integrated the procurement system is with the public financial management system given the direct interaction between procurement and financial management, from budget preparation to planning treasury operations for payments.

Synthesis of the indicator

The legislative framework requires preparation and publication of Annual Procurement Plans (APPs) by procuring entities. Since roll out of the eGP system in 2024, all procuring entities are required to upload Annual Procurement Plans and subsequent amendments to the eGP system. APPs are approved by PRAZ, which conducts pre-approval compliance checks on matters such as choice of procurement method and aggregation of requirements for planned procurements, as well as institutional checks including PMU resources and qualifications of PMU staff. In 2025, APPS for 90% of registered procuring entities were published and publicly available on the eGP system thus increasing transparency of the planning stage and procurement pipeline.

Thorough, well-informed and timely preparation and publication of Annual Procurement Plans should also contribute to improved rigour of procurement planning, budgeting and expenditure by PEs. Concerns were expressed by stakeholders that, with certain aspects of the APP approval process, PRAZ is straying into transaction-related decision-making.[43] This perception is not beneficial to PRAZ's role as an independent regulator. As eGP becomes embedded, with more reliable data availability and improved PE compliance, judicious use by PRAZ of other compliance and oversight functions may be preferable.

Legal and regulatory provisions require alignment of proposed procurement expenditure with information published in Annual Procurement Plans. Accounting Officers are required to ensure that a procurement process has been approved in the APP, costs estimates are accurate and that the amount of approved estimates is committed before commencing any procurement process. Compliance is improving,

[43] This may also help explain the private sector's perception that PRAZ has conflicts of interest within its activities. See analysis at 5(d).

but systemic problems remain in terms of reliability of public finance data including challenges raised by fragmented data sources (see s.1.8), budget credibility and PFM commitment controls. Unbudgeted expenditure and underspending of budgeted funds were observed, and the MAPS Assessment team was unable to find concrete evidence of a comprehensive PFM feedback mechanism reporting on budget execution. Zimbabwe's National Development Strategy 2 2026-2030 acknowledges expenditure control and resource issues and includes actions for improvement.

Regulations/procedures for processing of invoices and authorisation of payments are set out in the PPDPAA, Treasury Instructions and PFM Regulations. The PPDPAA requires payment to be made within the time-limits set out in the contract, and thus, the timeframe for payments under contracts can vary. Comprehensive data is not available to permit an accurate data-based assessment of the extent to which invoices are processed and paid on time. It is clear from direct engagement with supplier stakeholders and the results of the private sector survey that delayed payments of undisputed invoices are a common experience and of increasing concern for the supplier community.

Summary of high risk gaps and recommendations of Indicator 4

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 4(a)		
Commitment of budget funds: There are significant issues with the reliability of public finance data (including fragmentation of data sources) and commitment controls with an adverse impact on the integrity of the budget execution process and reduced supplier confidence. **Budget management:** no comprehensive effective budgetary and financial management system providing timely information on contract execution. **Prior approval of Annual Procurement Plans:** PRAZ APP approvals process may dilute the accountability of accounting officers and create perceived conflicts of interest for the regulator.	►	**Commitment of budget funds:** Prioritise implementation of PFM reforms to strengthen PFM commitment controls and the reliability of public finance data for all procuring entities. Ensure interoperability between PFMS and eGP at relevant points in the procurement process. **Budget management:** Ensure that the PFMS is consistently and comprehensively used, with functionalities to track and provide timely information on budget execution and contract completion. All relevant authorities should be fully engaged to deliver effective interoperability between systems. **Prior approval of Annual Procurement Plans:** As eGP becomes embedded, consider alternative measures for relevant checks and balances such as oversight, guidance, and compliance audits.
Sub-indicator 4(b)		
Availability of funds prior to commencement of procurement: The legal framework requires	►	**Availability and commitment of funds:** Identify and implement measures to reduce

funding to be allocated before starting procurement but in practice, expenditure outside the public finance management system remains a problem and funds are not always available when contractual payment is due.		the occurrence of expenditure outside the PFMS and to provide necessary assurance that funds are available for expenditure which is appropriately committed and incurred.
Processing and payment of invoices: The legal and regulatory framework includes requirements and procedures for processing, authorisation and payment of invoices but financial procedures and Treasury management processes do not function to ensure payment of invoices in a timely manner and in accordance with contractual provisions.	►	**Improve Treasury processing for payment of invoices:** Improve Treasury management processes and practices to ensure payment of invoices in a timely manner and in accordance with contractual provisions.

Indicator 5. The country has an institution in charge of the normative/ regulatory function

This indicator refers to the normative/regulatory function in the public sector and its proper discharge and coordination. The assessment of the indicator focuses on the existence, independence and effectiveness of these functions and the degree of coordination between responsible organisations. Depending on the institutional set-up chosen by a country, one institution may be in charge of all normative and regulatory functions. In other contexts, key functions may have been assigned to several agencies, e.g. one institution might be responsible for policy, while another might be in charge of training or statistics. As a general rule, the normative/regulatory function should be clearly assigned, without gaps and overlaps. Too much fragmentation should be avoided, and the function should be performed as a well-coordinated joint effort.

Synthesis of the indicator

The Procurement Regulatory Authority of Zimbabwe (PRAZ) serves as the central regulatory body for public procurement. PPDPAA ss. 6 and 7 list the functions and powers of PRAZ. Key functions and powers provided for in the legal framework include: oversight and compliance including monitoring procurement activities of procuring entities; provision of advice and assistance to procuring entities on request;[44] policy development including advising the Government on incorporating environmental, social, and economic policies into procurement; training and capacity development; development and management of electronic tools, including a centralised e-government procurement system and statistical databases, and; making recommendations for amendments to procurement legal framework.[45] To discharge its functions,

[44] PPDPAA s.6(1)(g) "Provided that no such advice or assistance shall limit the responsibilities of a procuring entity for compliance with [the PPDPAA]"

[45] Some concerns were raised in discussions with stakeholders and in the results of the private sector survey about perceived conflicts of interest in the functions and activities of PRAZ. These have been identified as a gap with linked recommendations at indicator 4 and thus are not repeated at Indicator 5.

PRAZ has a staff establishment of 85 permanent staff based in its offices in Harare and Bulawayo. The organisation of staff at the CEO, Director and Manager levels is shown below.

PRAZ is established as a statutory regulatory authority and reports direct to the Office of the President and Cabinet (OPC). This reporting line endorses the standing of PRAZ as an institution and provides the opportunity for PRAZ to share critical issues at a high level within the government. It also assists to ensure that PRAZ has necessary authority as a regulator engaging with procuring entities including ministries and parastatals and this is reflected in practice. PRAZ is a grant-receiving authority, but in practice, for recurrent expenditure, PRAZ is self-sustaining, and since 2024, it has been in a position to invest surpluses.[46] Self-financing facilitates PRAZ's ability to act more quickly and provides flexibility to attract talent, as well as enhancing its independence of operation. Primary sources of income for PRAZ are fees paid by procuring entities for applications to conduct procurement and for exemptions by suppliers for registration, participation in procurement processes and contract management. PRAZ also generates income through tailored capacity building/training programmes and events as well as conferences which are delivered in addition to free capacity building/training events.

Suggestions for improvement The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below: *Please see the Indicator Matrix for full wording of the suggestions for improvement.*
Sub-indicator 5(c)
The MAPS criterion requires that the head of the normative/regulatory function, i.e. PRAZ, commands sufficient authority within the governance structure to enable the institution to exercise its responsibilities. Public procurement data is an increasingly important strategic tool to identify national trends and support implementation of national priorities (see NDS2). Effective monitoring and support for planning and execution of public procurement should result in improved VfM outcomes at all levels of government. With this in mind it is appropriate to consider whether the current position of the CEO provides sufficiently high level and authoritative standing in government to enable PRAZ to effectively exercise the full range of its responsibilities.
Sub-indicator 5(d)
PRAZ should consider exploring further the reasons why it is perceived by the private sector that PRAZ has conflicts of interest in its functions and activities. This is in order for PRAZ both to address those concerns and improve how it communicates the nature of its regulatory role and activities and the measures it has in place to prevent and manage potential conflicts of interest.

Indicator 6. Procuring entities and their mandates are clearly defined

This indicator assesses: i) whether the legal and regulatory framework clearly defines the institutions that have procurement responsibilities and authorities; ii) whether there are provisions for delegating

[46] PRAZ Annual Report 2022, p.5.

authorities to procurement staff and other government officials to exercise responsibilities in the procurement process, and iii) whether a centralised procuring entity exists.

Synthesis of the indicator

Procuring entities are clearly defined in PPDPAA S.2 to cover (in summary): ministries, departments or other divisions of the Government; corporate bodies established for special purposes laid down in an act (including parastatals); state owned enterprises; provincial or metropolitan councils or a local authority, and: prescribed partnerships or joint ventures between the State and any person. In 2025, the total number of PEs registered with PRAZ was 372, comprising 29 ministries, 92 local authorities, 237 parastatals (SOEs fall within this category[47]) and 14 commissions.

According to the PPDPAA, responsibility for procurement lies with the accounting officer of each PE. Each procuring entity[48] is required to establish a procurement management unit (PMU), which has responsibility for managing all procurement activities in a procuring entity. Functions of the PMU are defined in the PPDPAA. The accounting officer, who heads the PMU, determines the size, structure and location of a PMU based on the procuring entity's requirements and the availability of trained and experienced staff. The PPDPA regulates the conduct of procurement officers including on decision making and procurement officers are accountable for their actions. Schemes of delegation are set out in PEs' own standard operating procedures (SOPs). In some cases, these standard operating procedures need to be reviewed and updated.

There is no single centralised procurement function in charge of consolidated procurement or framework agreements. The authorities in Zimbabwe have, however, considered and adopted various measures to increase procurement efficiency. Framework agreements are used by procuring entities for procurement of common-use items. There are examples of specialised or sector-based procurement functions, such as NatPharm, which procures medical supplies on a national basis, the procurement of uniforms for all forces now led by MoFEDIP and consolidated procurement by the Ministry of Health. A National Standardised Price List for 42 product categories is also being prepared as a reference guideline for decision makers, with prices planned to be subject to regular review. To further enhance the efficiency of public spending, it is suggested that PRAZ conducts a feasibility study for the practical implementation of a transversal, cross-sector central purchasing function.[49]

Suggestions for improvement
The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below:
Please see the Indicator Matrix for full wording of the suggestions for improvement.

[47] Fund (Zimbabwe's sovereign wealth fund) were exempted, by Presidential decree, from the full application of the PPDPAA. However, following legislative amendments and issue of PRAZ circular OPS/3 of 2024 the previously exempted MIF portfolio companies were, for practical purposes, brought back within the coverage of the PPDPAA and they are registered with PRAZ as procuring entities. MIF companies may apply to PRAZ on a case-by-case basis for exemptions from specific provisions of the PPDPAA based on the need to operate commercial business units or in competitive markets.

[48] PPDPA S 17(4) provides that where a procuring entity's activities do not justify the need for establishing a PMU, procurement activities of that entity can be performed by the entity's parent body or by another procuring entity's PMU. Alternatively, an independent procurement agent can be appointed to fulfil this function.

[49] See full wording of this suggestion for improvement in the Indicator Matrix at 6(b)(a).

Sub-indicator 6(b)
To further enhance the efficiency of public spending, it is suggested that PRAZ conducts a feasibility study for the practical implementation of a transversal, cross-sector central purchasing function. This study should aim at centralising the procurement of the main categories of works, goods, and services (top spenders) of common use within the public administration, while maximizing the utilisation of framework agreements for use by multiple PEs, dynamic purchasing arrangements, e-auctions and the electronic government procurement (eGP) system.

Indicator 7. Public procurement is embedded in an effective information system

The objective of this indicator is to assess the extent to which the country or entity has systems to publish procurement information, to efficiently support the different stages of the public procurement process through the application of digital technologies, and to manage data that allows for analysis of trends and performance of the entire public procurement system.

Synthesis of the indicator

The MAPS Assessment has been conducted during a period of transition from paper-based to fully electronic procurement, resulting in identification of several gaps which are in the course of being addressed by PRAZ. An incremental improvement in public availability of data is observed with significant opportunities for further positive development.

In terms of general availability of information on procurement, this is accessible through a number of different media including the Government Gazette, the PRAZ website, social media, the electronic Government Procurement (eGP) portal operational from January 2024 and 191 Community Information Centres (CICs) established through joint efforts of PRAZ and Zimpost, using the physical office network of Zimpost. Information available from the various media sources is, however, fragmented and not harmonised across information channels.

With the eGP system increasingly adopted, it is expected that, over time, all procurement information will be available through the eGP portal, making it a one-stop source for public procurement data. Although the eGP was launched to centralise procurement information, there is no clear legislative mandate requiring all procuring entities to use the system (see analysis, Gap and recommendations at Indicator 1(j)). As a result, adoption is uneven, and the information on the portal is neither comprehensive nor consistently up to date.

Electronic registration of procuring entities and registered suppliers commenced in January 2024. In 2025 there were 372 registered procuring entities and 12,191 suppliers registered on the eGP system.[50] Some key procurement data including open and closed tenders, award notices (when published), and annual procurement plans for registered procuring entities, is now consolidated, freely available, and accessible to all stakeholders through the eGP system. In 2025, Annual Procurement Plans were published on the eGP system for 90% of registered procuring entities. The e-bidding module (from advertisement up to opening of bids) is widely used, with 26,947 notices inviting bids published on the eGP system in 2025.

[50] Based on eGP Supplier Registration Infographics: -Note that analysis at 7(a)(b) flags inconsistency between published eGP data and figures available through the Government Gazette.
https://egp.praz.org.zw/egp-QW5hbHl0aWNzTWVyY2hhbnRHcmFwaGljcy9tZXJjaGFudF9ncmFwaGljc19ncmlk

Bidding documents, including technical specifications, are now published for individual procurements under their respective eGP tender pages, although the availability of documents is inconsistent and they must be downloaded manually. Use of the e-evaluation, e-award and contract management modules remain very low compared to the e-bidding module and procurement processes are still largely conducted offline beyond the bidding stage, with only 1570 contract award notices published on the eGP system in 2025. PRAZ is aware of this issue and is actively working on remediation actions.

At present, the available data is unstructured and insufficient for monitoring or evidence-based decision-making. It lacks the detail required to generate key performance indicators, such as procurement lead times or bidder participation rates, meaning PRAZ quarterly reports remain the primary source for statistics. PRAZ quarterly reports rely almost entirely on self-reported data from procuring entities, limiting timeliness, reliability, and comprehensiveness. eGP Phase 2, to be implemented, includes roll out of data analytics and spend analyses.

The eGP system in use follows a Commercial Off-The-Shelf (COTS) model, meaning it is a pre-developed solution configured to meet PRAZ requirements rather than a fully custom-built system. The eGP unit within PRAZ is small, comprising only five permanent staff and five interns, which is insufficient to manage a nationwide system, provide user support, provide end-users training, oversee the vendor, get in-depth training and knowledge transfer from the vendor and develop new functionalities simultaneously. PRAZ relies over-heavily on consultants from the eGP vendor for operational and technical support, limiting its ability to independently maintain and enhance the platform. To address these shortfalls, PRAZ has already planned for significant expansion of the eGP unit and has commissioned a third-party audit of the eGP to assess system limitations, performance, stability, security, and technical debt.

User support needs to be improved as the current model is unsustainable. Implementing a structured and scalable training programme, including a Training-of-Trainers modules would be beneficial to the general operation of the eGP system by developing in-house capacity within procuring entities and reducing reliance on the central eGP team. Integration of complementary training initiatives already provided, such as workshops, videos and online forums should assist to ensure consistent, nationwide support and sustainable adoption of the eGP system.

Summary of high risk gaps and recommendations of Indicator 7

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 7(a)		
Limited reporting and analytical capacity of the eGP system: While the relatively new eGP system has expanded public access to procurement information it currently produces only basic reports which do not support advanced analysis of procurement performance, trends, or efficiency, limiting		**Leverage the Monitoring and evaluation monthly data collection templates** to revise, expand and standardise the publicly available list of key performance indicators **Enhance the eGP system's reporting and analytics capabilities** to enable end-to-end reporting and publish data analytics and

their value for strategic management and policy oversight.		performance monitoring reports online, covering the entire procurement cycle from planning to execution.
Unavailability of critical procurement documents: critical procurement documents are either not publicly available or are published inconsistently and access is not user-friendly. No clear guidance on online publication of procurement information or use of electronic signatures.		**Enhance eGP system to ensure consistent publication of full procurement documents** in a well organised and labelled format. **Issue clear guidance** underpinned by legal provisions, on publication of procurement documents and use of electronic signatures.
Unstructured data limits the ability to aggregate, analyse and generate reports from the eGP system, limiting transparency, interoperability and effective use of that data.		**Procurement processes should transition from document-based workflows to structured digital forms** in order to enable automated reporting, improve data consistency, and reduce duplication and administrative inefficiencies. **The eGP system should capture procurement data in structured, machine-readable formats** and publish key information across the procurement cycle in open data formats such as CSV **OCDS:** Develop an implementation plan align procurement data publication with the Open Contracting Data Standard (OCDS).
Sub-indicator 7(b)		
Over reliance on vendor consultants: PRAZ's capacity to manage and sustain the eGP system is limited by a heavy reliance on vendor consultants. Knowledge transfer is currently inadequate to build sufficient in-house expertise.		**Reduce reliance on vendor consultants:** With the expansion of the eGP team, PRAZ should continue to focus on strengthening in-house technical expertise and reducing reliance on vendor consultants. Vendor-led training and knowledge transfer should be enhanced to cover advanced technical areas
System performance and user experience issues remain unresolved, communication on eGP improvements is inconsistent, and staff retention policies are insufficient to retain highly skilled technical personnel		**System performance and user experience issues should be addressed**, while communication on planned and ongoing eGP improvements should be strengthened through a publicly available roadmap, regular newsletters, release notes, and user engagement forums.
Training on eGP to be improved: The absence of a Training-of-Trainers (ToT) programme		**Implement a structured and scalable training programme, including a Training-of-Trainers**

prevents knowledge being cascaded within procuring entities and PRAZ eGP unit remains the sole source of expertise. Training initiatives are largely reactive and ad-hoc, lacking structure and scalability		**(ToT) model**, to develop in-house capacity within procuring entities and reduce reliance on the central eGP unit. **Complementary tailored training initiatives**, such as workshops, videos, and online forums, should be integrated within this structured framework.
Current user support model is unstainable, to manage external queries efficiently, placing additional pressure on the small central team and increasing the risk of stakeholder dissatisfaction.		**Strengthen user support** through the monitoring of the response time through the helpdesk ticketing system to ensure efficient handling of queries and issues from both PEs and suppliers.
Sub-indicator 7(c)		
Data entry: the eGP system relies heavily on manual text entry and document uploads and does not include a comprehensive data analytics tool to track procurement performance, spend or indicators		**Structured data entry:** Enhance the eGP system to support structured data entry with automated validation checks and auto-population to reduce redundancy and minimize errors. **Transform procurement processes** from document-driven workflows to fully structured digital forms. **Integration with external systems** is recommended to improve efficiency, accuracy, and reduce the risk of fraud.
Lack of data analytics and limited reporting capabilities: The eGP system currently lacks a comprehensive data analytics module, and reporting capabilities are limited		**Data-driven eGP:** Upgrade the eGP system to incorporate data-driven principles throughout the procurement cycle. A dedicated analytics module should generate timely and accurate statistics, reducing reliance on aggregated self-reported data from procuring entities. **Interoperability with the PFM system** should be implemented to enable commitment budget checks, provide actionable insights and support evidence-based decision-making, strengthen oversight, and improve overall procurement performance.
Limits on reporting, monitoring and feedback: There is no formal process to integrate data from self-reporting and eGP for continuous monitoring and system improvement during the transition period from paper-based to fully electronic procurement. Rapid growth of public procurement has not been matched by		**Procurement records to be regularly reconciled with government expenditure data**, with interoperability with a fully functioning PFMS. Establish a structured process to systematically analyse, harmonise, and continuously improve the quality of procurement information

enhanced monitoring. There is no structured feedback loop to use insights for improving processes or the system		derived from both self-reporting mechanisms and the eGP system during the transition period, together with the establishment of a clear feedback loop.

Indicator 8. The public procurement system has a strong capacity to develop and improve

This indicator focuses on the strategies and ability of the public procurement systems to develop and improve. Three aspects should be considered: i) whether strategies and programmes are in place to develop the capacity of procurement staff and other key actors involved in public procurement; ii) whether procurement is recognised as a profession in the country's public service; iii) whether systems have been established and are used to evaluate the outcomes of procurement operations and develop strategic plans to continuously improve the public procurement system.

Synthesis of the indicator

Training, Support and Professionalisation: PRAZ delivers significant amounts of training and capacity building for procuring entities, including online learning, tailor-made paid training on request from institutions, regular capacity building /training events (online and in person), conferences and a procurement bootcamps for students. PRAZ Capacity Building Directorate has a strategy for developing the capacity of key actors involved in public procurement which is subject to ongoing review. Routine evaluation is part of the training programme process cycle. Feedback from procuring entities points to the need to tailor the more general capacity building/training events to better meet the needs of participants. Tertiary educational institutions and specialist organisations also provide relevant education and training. Professional bodies and training organisations including the Zimbabwe Institute of Procurement and Supply,[51] and CIPS[52] are also active in Zimbabwe.

PRAZ does not publicise an advisory service or help desk function to resolve questions raised by procuring entities, suppliers and the public on the application and interpretation of public procurement rules and policy. Other than technical guidelines, circulars and instructions there are no online user-friendly resources, such as answers to frequently asked questions (FAQ) on the PRAZ website. In practice, PRAZ provides personalised support to procuring entities by initiating contact as well as responding to matters arising in monitoring processes, through phone calls, e-mails and walk-in contacts with clients/procuring entities. It would be worthwhile for PRAZ to engage with suppliers, the public and procuring entities to explore what types of support would be the most welcome and effective for each of those stakeholder groups.

Procurement is recognised as a specific function, with procurement positions defined at different professional levels within PMUs. There are job descriptions with qualifications and competencies specified. PRAZ assesses the staffing of PMUs as part of the process for PE authorisation to conduct procurement. There are competitive processes for the recruitment of procurement professionals. The Public Service Commission appoints public servants for MDAs and procurement professionals are appointed directly by other types of procuring entity. he principle that "employment, training and advancement practices must

[51] https://www.zips.org.zw/
[52] https://www.cips.org/events-networking/branches/zimbabwe

be based on merit, ability, objectivity, fairness, equality of men and women and the inclusion of persons with disabilities" is embedded in the Constitution, flowing down into practices and procedures at PE level

Monitoring performance to improve the system: Performance measurement of individual PEs' performance and the procurement system is led by PRAZ, primarily through its Monitoring and Evaluation activities. PRAZ collects monthly data from procuring entities which is used to monitor compliance and provide feedback to individual procuring entities. PRAZ also undertakes detailed compliance reviews of the activities of selected PEs the outcome of which include comments and recommendations for improvement in performance. Data from monthly returns is the primary source for Quarterly Stakeholder reports produced by PRAZ, providing consolidated data on the operation of the procurement system. In its Quarterly Stakeholder Reports, PRAZ highlights data which can be used to inform and support strategic policy making. The introduction of the eGP system is a potential gamechanger in terms of data collection and availability to enhance performance measurement (see analysis at indicator 7). There is a comprehensive strategic plan in place, with reform initiatives aligned with national objectives, a detailed performance framework and clear allocation of responsibilities.

3.3. Pillar III - Public Procurement Operations and Market Practices

This Pillar looks at the operational efficiency, transparency and effectiveness of the procurement system at the level of the implementing entity responsible for managing individual procurements (procuring entity). In addition, it looks at the market as one means of judging the quality and effectiveness of the system in putting procurement procedures into practice. This Pillar focuses on how the procurement system in a country operates and performs in practice.

Indicator 9. Public procurement practices achieve stated objectives.

The objective of this indicator is to collect empirical evidence on how procurement principles, rules and procedures formulated in the legal and policy framework are being implemented in practice. It focuses on procurement-related results that in turn influence development outcomes, such as VfM, improved service delivery, trust in government and achievement of horizontal policy objectives.

Synthesis of the indicator

The MAPS Assessment team sampled 108 procurement files from 19 procuring entities, looking at all stages in the procurement cycle, from planning through to contract delivery. Details of the methodological approach to sampling and information on the files sampled is set out at section 1.6 of this report. The sampling identified shortcomings particularly in the planning and contract monitoring stages of the procurement cycle and flagged a general concern about quality and comprehensiveness of centralised record keeping. At the planning stage, evidence-based needs analysis and rigorous market research is not embedded in procurement planning. While procuring entities recognise the importance of Annual Procurement Plans (APPs), decisions within these plans are frequently disconnected from crucial factors such as market capacity, current pricing trends, and genuine operational needs. At the post-award phase contract amendments were well recorded but, in many cases, there was a lack of evidence of rigorous quality control and final acceptance processes. The assessment identified missed opportunities for the direct involvement of relevant external stakeholders in monitoring public procurement.

There is a good general understanding of and adherence to the rules governing selection of appropriate procurement methods. Standard bidding documents were well used and thus procedures for bid submission, receipt and opening are clearly described together with descriptions of the selection and award criteria to be applied, although most award decisions are based on price. Technical shortcomings in the development of procurement specifications are noted as widespread and sustainable procurement requirements in procurement and contract documents are not commonly used. The average time required for completion of a procurement process in the sampled files[53] is 131.8 days which suggest the need for a targeted review of procedural bottlenecks, particularly in the planning, specification, and evaluation phases, to significantly enhance operational efficiency.

Data available from the sampled procurement files on the post award process was generally lacking. The MAPS Assessment team was thus unable to reliably assess contract management due to missing data points for timely completion and contract overruns. In terms of invoicing and payment, in many cases payment records are retained by the finance department in a PE but there is often no reliable or automated system to share that information with the PMU, meaning that the procurement file is not a complete record of the procurement process.[54] Pending transition to full adoption of eGP for all stages of the procurement cycle, it is recommended that measures are taken to support improved record keeping.

Summary of high risk gaps and recommendations of Indicator 9

Note for readers: the Gaps and Recommendations presented below are short-form summaries. Please see the Matrix for the full wording of the Gap, reasons for the Red flag (where relevant), and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 9(a)		
Evidence based needs analysis to identify requirements and effective market research are not embedded in the planning process and reactive behaviours resulting from poor planning are observed.		**Mandate the use and documentation of evidence-based needs assessments and market research** before finalising annual procurement plans (APP) and consider measures to ensure early engagement of PMUs in the PE budget planning process. Implement supporting capacity building initiatives. **Ensure consistent use of the APP template** to improve compliance, data quality internal controls and accountability.
Technical shortcomings in procurement specifications are widespread together with poorly structured evaluation criteria.		**Introduce structured, specialised training** on drafting specifications (functional vs. technical) and designing objective, quantitative evaluation criteria.
Sustainable procurement requirements are not widely used in practice.		**Develop and issue a national Sustainable Procurement Policy** (see also 3(a))

[53] This is based on assessment of 83 out of the total of 108 files. Relevant dates for calculation of average time for completion were missing in 25 files.
[54] See indicator 4 for findings, Gaps and Recommendations on late payment of invoices.

		Mandate the inclusion of specific, weighted sustainable evaluation criteria (see also 9(c) **Provide staff training and capacity building** programmes focused on Sustainable Procurement.
Sub-indicator 9(b)		
Multistage procedures not used: Formal prequalification procedures for multi-stage complex procurements were not observed and there was no documented explanation or justification for use of limited pool of key suppliers in some cases.		**Enforce mandatory use of prequalification/ registration processes** for complex/high-value categories through eGP. **Document and publish the criteria and rationale for inclusion/exclusion** in any closed list, ensuring fairness and transparency.
Non-publication of contract award notices: publication of contract award notices observed in only in 41% of cases, indicating either failure to publish or lapse in record keeping.		**Mandate publication of the award notice on the eGP system** and automatically generate and timestamp the notice.
Sustainability considerations are absent from contract clauses		**Mandate the inclusion of specific, weighted sustainable evaluation criteria and corresponding performance clauses** (e.g. life-cycle costing) in all tender documents for relevant categories.
Sub-indicator 9(c)		
Lack of records for stage from contract signature to contract completion: sampled file consistently failed to fully document the stage from contract signature to final contract completion, compromising effective contract management.		**Record key milestones:** Ensure timely recording of key milestones on the procurement file, with clear accountability and regular monitoring. **Support this through records management training** for procurement staff.
Lack of full payment records on the procurement file: In 87% of the procurement files assessed there were no payment records found on the procurement file, although they may be retained elsewhere in the PE.		**Mandate inclusion of payment records in the procurement file.** **Support this through records management training** for procurement staff. **Integrate the eGP system with the national Public Financial Management System (PFMS)** to automatically link relevant payment records with eGP system.
Inconsistent APP formats and inadequate statistical data at PE level: All PEs have APPs, but in varying formats. Statistical data maintained by PEs is inadequate for measuring and improving practices.		**Mandate adherence to use of standard APP template** for all PEs. **Develop and enforce tracking of a minimum set of Key Performance Indicators** (KPIs) (e.g., responsive bid rate, average cycle time) through the eGP system.

Very limited evidence of direct involvement of external stakeholders: No direct involvement of civil society observed in 90% of files. There is no formal provision for external oversight by civil society throughout the entire procurement cycle.		**Develop a framework for civil society monitoring.** **Institutionalise civil society access** to bid opening records, publication schedules, and debriefing reports to enhance external accountability.
Incomplete procurement files: Nearly all files sampled exhibited some level of incompleteness with most files missing up to 25% of expected documents, assessed against standard lists of documents by type of procurement process. This suggests a need for substantial improvements in documentation and file-keeping standards.		**Mandate the use of a standard content page on a procurement file**, pending transition to full use of eGP. **Introduce a mandatory digital document checklist** within the eGP system that prevents the closure of any file until all required documents are uploaded and verified. Implement a zero-tolerance policy for incomplete files. **Provide staff training and capacity building focused on records management**.

Indicator 10. The public procurement market is fully functional

The objective of this indicator is primarily to assess the market response to public procurement solicitations. This response may be influenced by many factors, such as the general economic climate, policies to support the private sector and a good business environment, strong financial institutions, the attractiveness of the public system as a good, reliable client, the kind of goods or services being demanded, etc.

Synthesis of the indicator

Dialogue with the private sector: The Constitution of Zimbabwe requires Parliament to facilitate public involvement in its legislative and other processes. In the period 21- 25 July 2025, the Portfolio Committee on Budget, Finance and Investment Promotion and the Public Accounts Committee of the Parliament of Zimbabwe scheduled consultations in 5 locations in Zimbabwe on proposed amendments to the PPDPAA. PRAZ also runs forums for consultation with stakeholders concerning proposed changes to the public procurement system and the Office of the Attorney-General conducts direct engagement with stakeholders, including representatives of the private sector, in order to consult on proposed changes and inform preparation of draft legislation.

Stakeholders commented, in direct discussions with the MAPS Assessment team, that Parliamentary consultation in particular can be technical and framed in an over legalistic manner which is not conducive to meaningful public debate. Results of the anonymous online private sector survey reveal a clear split in the experience of suppliers in terms of the effectiveness of communication by government or PRAZ on formulation of proposed changes to the public procurement legal and regulatory framework. Feedback from stakeholders flagged a commonly held perception that consultation is a rubber-stamping exercise, with stakeholder input ignored or not implemented and without a transparent feedback process. The private sector survey also explored whether and how the government/PRAZ help the private sector to keep pace with changes made to the legal and regulatory framework for public procurement. 53% of the 449 respondents agreed that the government/PRAZ helped them to keep pace with those changes, and nearly half (47%) disagreed. Several responses to the survey commented on the need to demystify legal complexity and provide more user-friendly explanations of or training on the changes.

PRAZ organises training programmes for the supplier community and has also participated in and delivered targeted training for SME and women-owned businesses, as well as hosting events for special interest groups on affirmative procurement. Feedback from the private sector representatives indicates a need for more training tailored for the specific needs of very small and micro-enterprises including women-owned businesses seeking to participate in the procurement market.

Private sector access to the public procurement market: Reliable data on the total number of active suppliers is currently limited although it is clear that the informal economy and micro-enterprises constitute a substantial proportion of establishments. The Government acknowledges in NDS2 the importance of the contribution of small and micro-businesses to the economy and the need to support growth in this sector, including through business and skills training and strengthening of access to finance.[55] Engagement with the private sector confirmed the existence of a number of systemic constraints inhibiting private sector appetite for and access to the procurement market, most notably: use of inappropriate procurement methods; unfair allocation of contract performance risks; use by PEs of post-contract VfM reviews resulting in demands for reduction in prices even after contract signature and delivery, and limited access to finance.[56]

Key sectors and strategies: The Government has published two comprehensive National Development Strategies spanning the period 2021 to 2030. National Development Strategy 2021-2025 (NDS1) and National Development Strategy 2026-2030 (NDS2) have both identified a number of key sectors which are associated with the public procurement market, for priority development. NDS2 explicitly acknowledges the opportunities that public procurement presents to influence sector markets and facilitate key value chains and job creation. Market risk analyses have been conducted, for example in the context of development of the pharmaceutical industry and to prepare the National Standardised Price List which will provide a guideline for decision makers at PEs on USD market prices for 42 commonly procured goods and services.

Summary of high risk gaps and recommendations of Indicator 10

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

[55] NDS2 paragraphs 1245 to 1250.

[56] See also, related analyses in this section 3 of Gaps and recommendations under sub-indicators 1(b) Choice of procurement methods, 1(d) Barriers to entry, 4(b) Payment of invoices and note on impact of macro-fiscal issues on public procurement at section 2.2.

High risk gap	Red flag	Recommendations
Sub-indicator 10(a)		
Lack of meaningful consultation: There are established processes for consultation and engagement with the public, including the private sector, when formulating changes to the procurement system. There is, however, a widely held perception that engagement is not genuinely consultative, open or effective. This significantly reduces overall confidence in the consultative process.	►	**Implement an effective "feedback loop"** on the outcomes of engagement including explaining how stakeholder input has been taken on board and giving full reasons why concerns or suggestions have not been reflected in the changes.
Sub-indicator 10(b)		
There are a number of systemic constraints which inhibit private sector access to and appetite for the public procurement market, including access to financing (both government supported and privately sourced), supplier fees for registration and participation in procurement, inappropriate risk allocation in contracts significant delays in payments under government contracts. Post-contract VfM reviews create commercial uncertainty.	►	**Undertake a critical study to fully identify and assess systemic constraints inhibiting private sector access** to the procurement market with the aim of identifying practical solutions to increase appetite to participate in public procurement processes and enhance levels of participation. To mitigate the commercial risks arising from post-contract VfM reviews, incorporate robust price adjustment formulae in contract terms.

3.4. Pillar IV - Accountability, Integrity and Transparency of the Public Procurement System

Pillar IV includes four indicators that are considered necessary for a system to operate with integrity, that has appropriate controls that support the implementation of the system in accordance with the legal and regulatory framework, and that has appropriate measures in place to address the potential for corruption in the system. It also covers important aspects of the procurement system, which include stakeholders, including civil society, as part of the control system. This Pillar takes aspects of the procurement system and governance environment to ensure they are defined and structured to contribute to integrity and transparency.

Indicator 11. Transparency and civil society engagement strengthen integrity in public procurement

Civil society, in acting as a safeguard against inefficient and ineffective use of public resources, can help to make public procurement more competitive and fairer, improving contract performance and securing results. Governments are increasingly empowering the public to understand and monitor public contracting. This indicator assesses two mechanisms through which civil society can participate in the public procurement process: i) disclosure of information and ii) direct engagement of civil society through participation, monitoring and oversight.

Synthesis of the indicator

Assessing the transparency and inclusiveness of civil society engagement in public procurement reforms reveals significant overlap with the analysis and findings under Indicator 10. The Constitutional requirements for consultation referenced there apply equally to civil society, as do the engagement processes followed by Parliament and PRAZ. Feedback from civil society aligns with the private sector view that Parliamentary consultations are technical and legalistic and echoed private sector concerns that consultations can amount to a 'rubber-stamping' exercise, with a perception that stakeholder input is frequently ignored or not implemented, and with no transparent mechanism for feedback.

There are good examples of PRAZ-led engagement with civil society, but civil society representatives flagged the need, in direct discussions with the MAPS Assessment team, for proactive direct contact by the government and PRAZ with a more diverse group of civil society organisations.[57] The MAPS Assessment team was unable to find evidence of well-established, permanent and ongoing programmes focused on building the capacity of relevant civil society stakeholders and specifically aimed at facilitating CSOs to monitor and improve public procurement. Limited capacity building, together with incomplete publicly available data on procurement, hinders the ability of civil society to contribute to enhanced accountability and positive improvements in the public procurement system. The procurement legal and regulatory framework does not require or make specific allowance for citizen participation in the planning (consultation), observation or monitoring of a procurement process. The introduction of eGP and resulting increase in publicly available data presents an excellent opportunity for tailored capacity building and enhanced opportunities for civil society involvement in general oversight of the public procurement system and in procurement processes to improve transparency and accountability.

Summary of high risk gaps and recommendations of Indicator 11

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 11(a)		
Engagement is not meaningful, open or effective: Lack of evidence to demonstrate that the government takes into account the input, comments and feedback from civil society. Strong perception that engagement with civil society is not open and effective.	►	**Implement an effective "feedback loop"** to provide feedback on the outcomes of engagement, including explaining how feedback from civil society has been taken on board and giving full reasons why concerns or suggestions have not been reflected in the changes.
Sub-indicator 11(b)		

[57] The MAPS Assessment team was able to identify and engage with a wider group of CSO stakeholders than those who were directly contacted by PRAZ for the purposes of the formal consultations on statutory changes.

Incomplete information on the legal and regulatory framework and, in particular, data on specific procurements hinders effective participation of civil society to ensure accountability and visibility of the flow of public funds.		**Publish a comprehensive, publicly accessible collection of all procurement laws, regulations, circulars, guidelines and policies** at a single, online location (for detailed recommendations see 1(a)(d), 2(a)(a) and 7(a)). **On-line publication of eGP data:** As eGP is rolled out, publish eGP data online to ensure that all stakeholders have adequate and timely access to information related to specific procurements (for detailed recommendations see indicator 7).

Indicator 12. The country has effective control and audit systems

The objective of this indicator is to determine the quality, reliability and timeliness of the internal and external controls. Equally, the effectiveness of controls needs to be reviewed. For the purpose of this indicator, "effectiveness" means the expediency and thoroughness of the implementation of auditors' recommendations. The assessors should rely, in addition to their own findings, on the most recent public expenditure and financial accountability assessments (PEFA) and other analyses that may be available.

Synthesis of the indicator

The Constitution, laws and regulations establish a comprehensive financial control framework covering internal controls, including audit committees, and internal audit and independent external audits by the Auditor-General or qualified external auditors (as appropriate) and for Parliamentary oversight.[58] However, implementation of various aspects of the financial audit control framework is weak, in particular internal audit controls are not yet fully functional in all procuring entities and in respect of measures to follow up on both internal and external audit recommendations.

Zimbabwe's supreme audit institution is the Office of the Auditor-General (OAG), which has a constitutional mandate to audit the accounts, financial systems and financial management of all departments, institutions and agencies of government, all provincial and metropolitan councils and all local authorities. The Constitution provides for institutional independence of the OAG, but that independence is constrained by funding and resource issues. The OAG carries out risk-based annual auditing and publishes annual reports which are available to download from its website. It also carries out ad-hoc VfM audits. In practice, OAG annual audits are predominantly financial and compliance-focused, with procurement oversight conducted as part of those audits rather than specialised procurement audits. The Public Entities Corporate Governance Act (PECOG) requires SOEs/parastatals to appoint appropriately qualified independent external auditors required OAG is a public office but does not form part of the civil (public) service. Job opportunities for external auditors are published on the OAG's website, and appointment is a competitive process. As of 01 September 2025, there were 223 OAG external auditors.

[58] See Indicator 4 for assessment of effectiveness of expenditure commitment controls.

The PFMA requires all PEs to have an internal audit function and to establish internal audit committees. The regulatory framework provides for a risk-based approach to internal audit and control mechanisms. There are additional provisions in PECOG on the establishment and operation of internal audit and audit and risk committees in SOEs/parastatals. The structural set-up for internal audit and audit controls is under development and in a transition phase. For example, all MDAs have internal audit functions, but the audit committee system is not fully established or operational in all cases. The Central Internal Audit Unit housed under the MoFEDIP was established in 2020 to provide support for the governance and activities of internal audit and audit committees. Internal auditors are appointed by the Public Service Commission in the case of MDAs and by their employing institutions in the case of other types of PEs.

All auditors are required to comply with professional ethical standards which require independent exercise of their functions, in addition to other relevant ethics-related declarations such as the Integrity Pledge and the OAGG Code of Ethics Declaration.

The regulatory framework includes provisions to ensure follow up on internal and external audit findings, in particular through the activities of audit committees and the Parliamentary scrutiny process. There is a lack of data to assess responses to and implementation of internal audit recommendations. Planned automation of internal audit processes should assist data collection and analysis and for the preparation of an internal audit findings register. The Office of the Auditor-General publishes data on external audit findings and the extent to which those findings are addressed by procuring entities. Full implementation of external audit recommendations is low (33% in 2024), with Ministries and Commissions failing to address implementation in 59% of cases.[59] The legal framework provides for parliamentary oversight of state revenues and expenditures. OAG reports are laid before the House of Assembly, and the parliamentary Public Accounts Committee (PAC) conducts a post audit process with hearings conducted in public but there is no easily accessible comprehensive data on implementation of Parliamentary recommendations.

PRAZ fulfils a procurement-specific oversight role pursuant to its monitoring and supervisory functions provided for in the PPDPAA. PRAZ undertakes ongoing compliance monitoring of PE activities and has also implemented a system of compliance reviews of individual procuring entities which includes assessment of conduct of procurement, performance sampling and contract scrutiny. There is additional contract specific oversight through scrutiny by the Special Procurement Oversight Committee (SPOC) of sensitive and high value contracts prior to contract award.

PRAZ has been rolling out training on conduct of procurement audits. Building on training in 2024 and 2025, a procurement audit training programme is underway in early 2026. This is being by the International Training Centre of the International Labour Organization, with 40 participants from the Central Internal Audit Unit, OAG and PRAZ. Ongoing specialised training to support the conduct and delivery of public procurement focussed audits will benefit the public procurement system, to underpin improved integrity and increased transparency of the system.

Summary of high risk gaps and recommendations of Indicator 12

Note for readers: the Gaps and Recommendations presented below are short-form summaries.

[59] Public Finance Management Reform Strategy 2021-2025, Interim Review Report, on behalf of the MoFEDIP, December 2024, identifies limited responses and attention by the Government to the findings of the external auditors and states "[t]here is no follow-up on implementation of the recommendations made by the Auditor General and the Public Accounts Committee because of the lack of appropriate mechanisms (Treasury Minutes)." See Matrix analysis at sub-indicators 4(a), 12(a) & 12(c).

Please see the Matrix for the full wording of the Gap, reasons for the Red flag (where relevant), and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 12(a)		
Constraints on internal audit and functioning of audit committees: General budget constraints mean that the internal audit function is likely to be constrained in terms of the execution of audit plans. Audit committee system is not yet fully functional, reducing transparency and accountability.	▶	**Strengthen internal audit and monitoring functions** to detect and address non-compliance with expenditure controls, in line with NDS2. **Audit committees:** Prioritise the proper constitution and capacitation of Audit Committees for all PEs.
Sub-indicator 12(c)		
Lack of data on and systems for implementation of audit recommendations: Data and system to assess and monitor responses to and implementation of internal audit recommendations are not available. Full implementation of external audit recommendations is low. Comprehensive data and systems to address implementation of Parliamentary recommendations is lacking.	▶	**Introduce systems/measures to ensure that** • all PEs consistently record internal audit recommendations, prepare an action plan and track implementation. • PEs consistently prepare an action plan for implementation of external audit recommendations and track implementation. **Improve data on Parliamentary oversight of audit recommendations** through use of Parliamentary Budget Office (PBO) standard reporting template and implementation of proposal to link PBO system and PFMS **Consider enhanced structures for monitoring and reporting of audit recommendations** by an appropriate external agency.

Indicator 13. Procurement appeals mechanisms are effective and efficient

Pillar I covers aspects of the appeals mechanism as it pertains to the legal framework, including creation and coverage. This indicator further assesses the appeals mechanisms for a range of specific issues regarding efficiency in contributing to the compliance environment in the country and the integrity of the public procurement system.

Synthesis of the indicator[60]

[60] This synthesis includes analysis from 1(h) combined here with indicator 13 to provide an holistic overview of both the relevant legal/regulatory framework and operation of the challenge and review system in practice.

The PPDPAA grants a potential or actual bidder in procurement proceedings the right to challenge decisions or actions by procuring entities, with the challenge being submitted in writing to the procuring entity. When submitting the challenge, the bidder must also deposit a sum of money by way of security for costs ("challenge fee"), reimbursable in the event of a finding in favour of the bidder.[61] There is a subsequent right to apply for review by an independent Review Panel and provision for onward appeal to the courts. Timescales for both challenge and review are specified in the legal framework and do not unduly delay the procurement process.

The number of applications for review and Review Panel decisions is low. In 2025 there were 4 applications for review and 2 written Review Panel decisions. In 2024 there were 4 applications for review and 4 written Review Panel decisions. Numbers of applications for review should not be conclusive in determining confidence in and effectiveness of a procurement review system, but such limited use of the available system is a legitimate prompt for further enquiry. The quantitative analysis of the private sector survey results based on 449 responses indicates a general lack of trust in the challenge and appeals system. When the MAPS Assessment team explored reasons for not submitting a challenge or applying for review the complexity and time involved was often mentioned as was the payment of security for costs (challenge fee) and legal fees for representation. The MAPS Assessment team acknowledges the need to limit vexatious claims, but feedback received from stakeholders raises concerns that timing and level of fees may be one of the factors limiting access to justice for suppliers who have legitimate concerns about the conduct of procurement procedures.

Review Panels are set up on an ad-hoc basis on receipt of an application for review. PRAZ provides secretariat services to establish and support each Review Panel. Review Panel members are appointed from a pool of suitably qualified and experience persons. Advertisements calling for persons to serve as Review Panel members are published and PRAZ is obligated to keep a list of Review Panel members available for public inspection. Review Panel members are required to be independent and impartial and are obliged to disclose all potential direct or indirect personal interests.

Submission of a written application for review automatically suspends the procurement proceedings. The PPDPA and PPDPA Regs detail the procedure to be followed including rules on evidence, and decision making by the Review Panel. The Review Panel must deliver its written decision, with reasons, within fourteen days after the application for review is received by PRAZ. In the period 2022 to 2025, all decisions were issued within the statutory time period, but they are not publicly available. The MAPS Assessment team reviewed 25 Review Panel decisions, concluding that decisions were made on the basis of available evidence, information relevant to the case and with no evidence of bias. The Review Panel has authority to grant a range of remedies. The analysis of sampled decisions and data provided by PRAZ confirms that the Review Panel exercises it legal authority to impose a range of remedies as designated by the PPDPAA. Publication of Review Panel decisions would increase transparency and may assist to improve overall confidence in the system.

Summary of high risk gaps and recommendations of Indicator 13

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for the full wording of the Gap, reasons for the Red flag (where relevant), and Recommendations, with supporting analysis.

[61] The sum payable for security for costs ranges from USD 500 to USD 500 000 according to the nature and value of the contract.

High risk gap	Red flag	Recommendations
Sub-indicator 13(b)		
Challenge fees: The imposition of fees (also referred to in this context as security for costs) on contractors at the stage of submitting a complaint to the PE is unusual and prohibitive to the challenge and review (appeal) process particularly when combined with the applicable level of fees, which are high.		**Remove requirement to pay challenge fee (security for costs) at initial phase** of submitting a complaint to a PE. **Review the current challenge fee structure** to ensure that it does not create a barrier for access to justice for suppliers who have legitimate concerns about the conduct of procurement procedures. Include consideration of a separate challenge fee structure for small enterprises and a general reduction in challenge fees charged, including those applied to international bidders. The impact of these changes, together with improved transparency with publication of review body decisions, to be kept under review. If more active use of the system is not observed, consider whether a wholesale review is required to assess fitness for purpose of the challenge and review system and to make proposals for enhancement.

Suggestions for improvement The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below: *Please see the Indicator Matrix for full wording of the suggestions for improvement.*
Sub-indicator 13(b)
Meaningful bidder debriefing can be an effective tool both to improve overall transparency and confidence in the procurement process and to reduce the likelihood of legal challenges. Consider measures to ensure that bidders are provided with meaningful information by PEs at the debriefing stage so that they fully understand the reasons for decisions in the procurement process, in particular the contract award decision. Provide training for PEs to support improved debriefing practices.

Indicator 14. The country has ethics and anti-corruption measures in place

This indicator assesses i) the nature and scope of anti-corruption provisions in the procurement system and ii) how they are implemented and managed in practice. This indicator also assesses whether the system strengthens openness and balances the interests of stakeholders and whether the private sector and civil society support the creation of a public procurement market known for its integrity.

Synthesis of the indicator

The Constitution of Zimbabwe provides for the establishment and composition of the Zimbabwe Anti-Corruption Commission (ZACC). Other key institutions in the anti-corruption sphere are the National Prosecuting Authority (NPA), the Zimbabwe Republic Police (ZRP), the Judicial Service Commission which has established specialised anti-corruption courts and Zimbabwe Revenue Authority (ZIMRA). The publication of the first National Anti-Corruption Strategy (2020-2024) (NACS1) and implementation action plan was a huge step forward, providing for a comprehensive multi-agency anti-corruption framework with assigned responsibilities for appropriate agencies of government. Much has been achieved but lack of resources had a negative impact on full NACS implementation. Preparation of the successor strategy, NACS2 is underway, with consultation and validation events conducted in the third and fourth quarters of 2025.

Detailed legislative provisions concerning fraud, corruption, anti-terrorism and money-laundering and other prohibited practices are set out primarily in the Criminal Law Code[62] and the Prevention of Corruption Act[63] (POCA). There is also money-laundering and proceeds of crime legislation.[64] The bribery provisions in the Criminal Law Code are not fully aligned with the United Nations Convention Against Corruption (UNCAC) to which Zimbabwe is a signatory.

Procuring entities are required to report allegations of fraud, corruption and other prohibited practices to law enforcement authorities, and there is a clear procedure in place for doing this. There is, however, no specialised training for procurement officials or a standardised mechanism or data driven analysis available to systematically identify corruption risks in the public procurement cycle. The National Prosecuting Authority receives regular referrals for prosecution of allegations of fraud, corruption and other prohibited practices from both ZRP and ZACC. Referrals (dockets) may result in criminal prosecutions under the Criminal Law Code (in the case of public officials, most likely abuse of duty), fraud and corruption charges under POCA and actions to preserve, seize and recover assets. During 2024, ZACC referred 343 dockets to the NPA for prosecution of which 62% were for fraud related crimes and 9% were for criminal abuse of duty. In 2024 a total of 58 cases went to full trial with a conviction rate of 74%. In 2025, 2 firms/individual suppliers and 4 government officials were found guilty of fraud and corruption in public procurement.

Public confidence in the effectiveness of the anti-corruption framework is low.[65] This was confirmed in responses to the MAPS Assessment private sector survey and in direct discussions with stakeholders.

[62] Criminal Law (Codification and Reform) Act [Ch.9:23] (No.3 of 2004)

[63] Prevention of Corruption Act [Ch.9:16].

[64] Including the Money Laundering and Proceeds of Crime Act (Ch.9:24), Suppression of Foreign and International Terrorism Act [Ch.11:21], Criminal Matters (Mutual Assistance) Act [Ch.9:06] and related regulations.

[65] In 2024, Zimbabwe ranked 158 out of 180 countries in Transparency International's Corruption Perception Index (CPI). https://www.transparency.org/en/cpi/2024/index/zwe

There are respected and credible civil society groups that have a procurement focus within their agendas and actively participate in debate on public procurement, including through reports and other publications which are publicly available. Zimbabwe's Constitution explicitly guarantees freedom of expression and freedom of the media and access to information but in practice the environment for civil society organisations to have a meaningful role as third-party monitors is constrained. Channels for reporting cases of fraud and corruption are available with, for example, both ZACC and ZIMRA offering toll-free hotlines and WhatsApp numbers. However, the lack of effective statutory whistleblower and witness protections[66] and supporting mechanisms for a whistleblower framework mean that there is a strong perception that the channels are not necessarily secure and confidential. This significantly undermines general confidence in the anti-corruption framework.

All procurement officers must comply with the statutory Code of Conduct for Procurement Officers which includes provisions on accountability and financial disclosure. The legal framework includes conflict-of-interest provisions which apply to all procurement officials as well as requirements for asset declarations by board members and senior staff but does not include provisions for a "cooling-off" period for former public officials. There is room for improvement in the drafting of conflict-of-interest provisions in the Public Service Regulations. All government officials who are involved in public finance management (including procurement officers) are subject to codes of ethics of their respective professional organisations and must comply with the general code of conduct for civil servants and sign the Integrity Pledge. Employees of Procuring Entities which are SOEs and parastatals are subject to ethical requirements of the Public Entities Corporate Governance Act including compliance with a code of ethics.

The PPDPAA provides for exclusion of bidders and contractors where they have been convicted of an offence involving corruption, and for debarment and declarations of ineligibility. There is a clear system for debarment, and a list of debarred suppliers is published on the PRAZ website.[67] Standard bidding documents and contract conditions contain relevant provisions addressing conflicts of interest, fraud and corrupt behaviours. In the context of individual procurement processes, procurement staff are required to make declarations of potential conflicts of interest and evaluation committee members are required to sign disclosure of conflict-of-interest statements before performing evaluations. The MAPS Assessment team was, however, unable to find evidence from sampled files that conflict-of-interest statements, financial disclosure forms and information on beneficial ownership (where required) are systematically filed as a matter of course by all procuring entities in procurement files.

Summary of high risk gaps and recommendations of Indicator 14

Note for readers: the Gaps and Recommendations presented below are short-form summaries.
Please see the Matrix for full wording of the Gap, reasons for Red flag (where relevant) and Recommendations, with supporting analysis.

High risk gap	Red flag	Recommendations
Sub-indicator 14(a)		

[66] At the end of November 2025, Cabinet considered and approved the long-awaited Whistleblowers and Witness Protection Bill setting out a framework for reporting by and protection of whistleblowers and protection of witnesses including the establishment of a Witness Protection Unit and an Appeal Tribunal under the NPA.

[67] https://www.praz.org.zw/debarment-list/. At December 2025, 10 companies are listed on the PRAZ website as debarred of which 2 are permanently debarred.

Conflict of interest: No clear definition and/or guidance on what constitutes an actual or potential "conflict of interest" in the Public Service Regulations **No "cooling off period"** for former public officials.	▶	**Introduce a clear definition and/or guidance on what constitutes an actual or potential conflict of interest**, in particular to clarify the nature of an act of misconduct which may lead to disciplinary proceedings for public service employees **Introduce provisions requiring a defined cooling off period** for former public officials.
Sub-indicator 14(d)		
Anti-corruption framework has insufficient capacity and resources for institutions to fully deliver on their assigned responsibilities	▶	**Commit appropriate levels of budget** to ensure that institutions are able to fully deliver on current assigned responsibilities and future implementation of NACS2.
No mechanism to identify procurement corruption risks: No standardised mechanism to systematically identify and mitigate corruption risks in the public procurement cycle	▶	**Stakeholder institutions will need to work together** to develop an effective mechanism for identifying and mitigating risks in the procurement cycle, with a multi-facetted approach including clear governance structures, tackling improved record keeping, well-functioning eGP and PFM systems to improve monitoring and datasets and professionalisation and training for procurement officials.
Sub-indicator 14(e)		
Constrained environment for civil society organisations to have a meaningful role as third-party monitors of the public procurement ecosystem	▶	**Government support for strong and credible civil society organisations** to exercise meaningful social audit and control in public procurement with formal channels for engagement actively promoted. **Build capacity of civil society** with tailored discussions and training including use of eGP data for monitoring.
Sub-indicator 14(f)		
Overarching finding under 14(f)(a), (b) & (c). **Lack of effective whistleblower and witness protections** continue to undermine confidence in the anti-corruption framework	▶	Combined recommendation for 14(f)(a), (b) & (c). **Continue to prioritise adoption and full implementation of the Whistleblowers and Witness Protection Bill** including the establishment of a Witness Protection Unit and Appeal Tribunal. **Supporting measures will also need to be put into place** including an effective system to follow up on reports of fraud, corruption and other prohibited practices.

		Pro-active coordination amongst institutions to facilitate implementation will be required as will sufficiently resourcing of the institutional anti-corruption framework
Sub-indicator 14(g)		
Lack of evidence that conflict-of-interest statements, financial disclosure forms and information on beneficial ownership (where required) are systematically filed as a matter of course by all procuring entities in procurement files **No central database** to collate this information and data to facilitate identification and prevention of corruption risks in procurement.	►	**Standardised statements/forms and centralised single online source:** Conflict-of-interest statements, financial disclosure forms and declarations of assets should be standardised and all filed and accessible through a single portal. Consider measures to mandate filing and retention of relevant statements/forms. **Prioritise the implementation of ongoing digitalisation projects** (including CGU) to develop databases of information and ensure interoperability. **Beneficial ownership:** Standard bidding documents to include provisions requesting information on beneficial ownership. There should be a publicly accessible online register of beneficial ownership with full disclosure of all beneficial owners.

Suggestions for improvement The MAPS Assessment team has identified areas for improvement which are not classified as Gaps for the purposes of the MAPS Methodology and provides the following suggestions, summarised below: *Please see the Indicator Matrix for full wording of the suggestions for improvement.*
Sub-indicator 14(a)
Revise Code of Conduct for Procurement Officers: When clear definition and/or guidance on what constitutes an actual or potential conflict of interest and/or provisions on cooling off period have been adopted, revise the Code of Conduct for Procurement Officers to align with those changes. (see Gap & Recommendation at 14(a).
Sub-indicator 14(d)
Integrity training: Consider offering specialised sector focussed integrity training programmes on a stand-alone basis, to include training on identification and handling of corruption risks. This may be tied in with increased availability of eGP data which can be used to identify potentially corrupt behaviours provided that those reviewing available data receive appropriate training**.**
Sub-indicator 14(g)
Standard templates for declarations of interest: In order to enhance consistency of practice on declarations of interest by procurement professionals and evaluation committee members, PRAZ

should consider issuing standard templates for declarations of interest to be used by all PEs and compatible for use with the eGP system.

4. Strategic action plan

This Strategic Action Plan presents Proposed Actions as comprehensive thematic initiatives, each addressing several gaps identified through the MAPS assessment of Zimbabwe's public procurement system. The actions consolidate recommendations across the four MAPS pillars into integrated reform initiatives, supporting an integrated and holistic approach to strengthening the procurement system in line with the MAPS methodology.

Following each Proposed Action, a short non-exhaustive list of relevant indicators is provided to facilitate understanding of how the Proposed Actions relate to the gaps and recommendations identified in the Report and the Indicator Matrix, and to ensure clear traceability between the identified gaps, recommendations, and the proposed reform measures.

	Proposed Action	Timeline	Responsible Institutions
1	Implement legislative improvements to address observed gaps or overreach in the procurement framework	Medium Term	PRAZ/Attorney General/Parliament/Line Ministry
	Including: specific enabling provisions for eGP and alignment of the regulatory framework with digital procurement processes/tools (e-reverse auctions, e-catalogues, online submissions); strengthening provisions governing competitive procedures and exceptions including direct procurement; clarification of procurement methods and legal mandates for digital procurement. **Relevant indicators:** 1(b), 1(c), 1(j), 9(b).		
2	Institute oversight frameworks to strengthen accountability systems and coordination of oversight bodies	Short-Medium Term	PRAZ/ZACC/OAG
	Including: strengthening procurement audit frameworks and specialised training for internal and external auditors; improved coordination between oversight institutions; mechanisms for identification and mitigation of corruption risks; and establishment of secure and confidential channels for reporting prohibited practices. **Relevant indicators:** 12(a), 12(c), 14(d), 14(f).		

	Proposed Action	Timeline	Responsible Institutions
3	Review and consolidate procurement guidelines and operational manuals to address gaps observed in operational processes	Short Term	PRAZ
	Including: strengthening guidance on procurement planning, evaluation, and contract management; improved security protocols for records management; improved use of standard bidding documents and standard contract conditions; and alignment with international procurement obligations and standards. **Relevant indicators:** 1(k), 2(b), 2(c), 3(b), 9(b), 9(c).		
4	Develop a capacity-building and professionalisation strategy to address competency gaps informed by the assessment	Short-Long Term	PRAZ
	Including: competency frameworks and certification programmes; training on sustainable public procurement, evaluation, market analysis and contract management; supplier training programmes including support for MSMEs; and integrity and ethics training for procurement officials and civil society actors. **Relevant indicators:** 3(a), 8(a), 8(b), 9, 10(a), 11(c), 14(d), 14(e), 14(g).		
5	Incorporate enhanced information repositories and transparency tools within the PRAZ portal and eGP platform	Short-Medium Term	PRAZ
	Including: establishment of a comprehensive online repository of procurement legislation, regulations, circulars, and guidelines; publication of procurement data and decisions of the Review Panel; and improved public access to procurement information. **Relevant indicators:** 1(a), 1(h), 2(a), 7(a), 11(b), 13(c).		
6	Implement eGP system enhancements to strengthen automation, data integrity and procurement monitoring.	Medium Term	PRAZ
	Including: eGP system improvements such as auto-population and auto-validation of procurement data, enhanced analytics capabilities, and integration of monitoring and evaluation functionalities to support procurement performance management. **Relevant indicators:** 7, 8(c), 9(b).		

	Proposed Action	Timeline	Responsible Institutions
7	Integrate the Public Finance Management System with the eGP system to enhance information exchange, strengthen expenditure control and planning.	Medium Term	PRAZ/ MoFEDIP
	Including: integration of procurement planning with budget processes; improved commitment controls; automated information exchange between procurement and financial management systems; and strengthened oversight of public expenditure. **Relevant indicators:** 4(a), 4(b), 9(a).		
8	Develop and implement a national sustainable public procurement policy framework.	Medium Term	PRAZ/OPC
	Including: development of policy frameworks and guidance on environmental, social and economic sustainability in procurement; integration of sustainability criteria into procurement processes; and alignment with national development priorities. **Relevant indicators:** 3(a), 9(a).		
9	Institute convenient regulatory support mechanisms for procuring entities and suppliers.	Medium Term	PRAZ
	Including: establishment of electronic advisory and helpdesk services; targeted training and support programmes for procuring entities and suppliers; and training of trainers (ToT) programmes for eGP implementation. **Relevant indicators:** 8(a), 9(b), 10(a).		
10	Strengthen transparency, open data, and stakeholder participation.	Short-Medium Term	PRAZ/CSOs
	Including: implementation of the Open Contracting Data Standard; publication of procurement datasets through eGP; engagement with private sector, and expansion of civil society engagement through consultation programmes, monitoring initiatives, and capacity-building activities. **Relevant indicators:** 7(a), 10(a),11(a), 11(b), 14(e).		

5. Validation and quality assurance

In December 2025/January 2026, in the run up to the validation week, the MAPS Assessment team shared the draft Matrix with members of the ASC and PRAZ, to allow time for review and preparation. The shared Matrix provided the basis for discussion and input when the MAPS Assessment team met in person with the ASC and with PRAZ CEO and executive management team, to discuss validation.

The validation week was conducted in Harare from 2 to 6 February 2026. As noted above, the MAPS Assessment team met with the ASC and PRAZ during that week. The MAPS Assessment team also engaged directly with institutional stakeholders, met with the legal community and conducted a dedicated discussion forum with procuring entities. (see Annex 1 Part 2 for further information).

The stakeholder Validation Workshop was held on 5 February 2026, with 102 participants including representatives of government institutions, procuring entities, private sector and civil society. During the Workshop the MAPS Assessment team: informed the key stakeholders of activities undertaken by the MAPS Assessment team in the period August 2025 to February 2026; presented key findings based on the MAPS Methodology and raised a range of issues requiring further clarification and validation.

Following conclusion of the validation week, the MAPS Assessment team moved on to finalise the draft Report to incorporate input gathered during the validation week and information/data collected as a follow up to the validation process. In mid-February 2026, the MAPS Assessment team circulated drafts for peer review and also provided updated draft documents to PRAZ for further discussion, including to jointly agree the strategic action plan.

The full draft Report was submitted to the MAPS Secretariat/Assessment Technical Advisory Group (ATAG) for external quality assurance in mid-March 2026. External quality assurance comments were received from the MAPS Secretariat and ATAG on 09 April 2026. The MAPS Assessment team provided responses to MAPS Secretariat dated 14 April 2026, together with an updated version of the Report and Matrix. The Report was approved by the MAPS Secretariat on 23 April 2026.

Indicator matrix

See ANNEX 1: Indicator Matrix - Assessment of the Republic of Zimbabwe Public Procurement System

Appendices/Annexes

Appendix 1 Assessment Steering Committee for MAPS for Zimbabwe

Members of the Assessment Steering Committee		
Name	**Designation**	**Institution/Organisation Represented**
Dr. Clever Ruswa (Chair)	CEO	PRAZ
Charles Gombiro	Monitoring and Evaluation Director	PRAZ
Keith Chiroodza	Strategy And Risk Manager	PRAZ
Benson Share	Operations Director	PRAZ
Enia Rugare	Acting Director for International Cooperation	Ministry of Finance, Economic Development and Investment Promotion
Johanne Gandiwa	Executive Secretary	Office of the Attorney-General
T Matanga	Director	Policy Analysis, Coordination and Development Planning, Office of the President and Cabinet
Dr Michael Musanzikwa	Chief Director for Public Procurement	Policy Analysis, Coordination and Development Planning, Office of the President and Cabinet
Sanguita Popatlal	Chief Director	Corporate Governance Unit, Office of the President and Cabinet
Lameck Muroyiwa	Director Of Audit	Office of the Auditor General
Preston Hwena	General Manager Procurement	Public Service Commission
Prof. D.J Simbi	Vice Chancellor	Chinhoyi University of Technology
Jephias Makiwa	Principal Economist	Zimbabwe National Chamber of Commerce
Chikomo T	Statistics	Zimbabwe Revenue Authority
Farai Mutambanengwe	CEO	SME Association of Zimbabwe
Obert Ngwenya	CEO	Small and Medium Enterprises Development Corporation
Onesimo Musi	CEO	State Enterprise and Restructuring Agency
Charity Matumbi	Acting Executive Secretary	Zimbabwe Anti-Corruption Commission

Assessment Steering Committee for MAPS for Zimbabwe Dates of Meetings, Briefings and Updates	
Date	**Engagement**
19 August 2025	ASC launch meeting in person
30 September 2025	Monthly update
31 October 2025	Monthly update
28 November 2025	Monthly update
15 December 2025	Briefing note and draft Matrix Pillar I with request for input
19 December 2025	Briefing note and draft Matrix Indicator 9 (sampling) with request for input
16 January 2026	Briefing note and draft Matrix Pillars II, III, IV with request for input
02 February 2026	ASC validation meeting in person

Appendix 2 Summary of stakeholder engagement meetings and events

Stakeholder/s	Event type
Launch week 18-22 August 2025	
Procurement Regulatory of Zimbabwe (PRAZ) • Chief Executive and Executive Management Team, Corporate Communications and Divisions • Parallel engagements with ICT Division/eGP team	Meetings
Private sector representatives	Discussion forum
Civil society representatives	Discussion forum
Anti-Corruption Commission	Meeting
Office of the Auditor General	Meeting
All stakeholders (150+ in-person plus online participants)	Launch Workshop
Verification week November 2025	
Procurement Regulatory of Zimbabwe (PRAZ)	Meeting
Ministry of Finance, Economic Development and Investment Promotion -including Chief Director Audit, Deputy Accountant General, Director Governance, Risk and Compliance, Assistant Director International Cooperation, Chief Economist and Central Internal Audit Unit.	Meeting
Corporate Governance Unit, Office of the President and Cabinet	Meeting
Zimbabwe Investment Development Agency (ZIDA)	Meeting
Public Service Commission	Meeting
Education/training representatives	Discussion forum
Private sector - MSMEs focus	Discussion forum
Civil Society Organisations	Discussion forum
October to December 2025 – online engagement with PRAZ	
Corporate Services including Review Panel and Debarment Committee Secretariat, Legal team	Meetings
Operations Division	Meetings
Monitoring and Compliance Division	Meetings
Capacity Building Directorate	Meetings
Information Communication and Technology Department	Meetings
Corporate communications, human resources and administration	Meetings
Validation week February 2026	
Procurement Regulatory of Zimbabwe (PRAZ)	Meetings
Office of the Attorney General	Meeting
National Prosecuting Authority	Meeting
Legal community including the Law Society of Zimbabwe, Zimbabwe Lawyers for Human Rights and legal practitioners.	Discussion forum
Procuring Entities	Discussion Forum
All stakeholders (102 participants)	Validation Workshop

Annex 1 Indicator Matrix - Assessment of the Republic of Zimbabwe Public Procurement System

MAPS | Methodology for Assessing Procurement Systems

Republic of Zimbabwe Assessment of the Public Procurement System

Annex 1 Indicator Matrix

APRIL 2026

AFRICAN DEVELOPMENT BANK GROUP

PRAZ PROCUREMENT REGULATORY AUTHORITY OF ZIMBABWE Efficient, Fair & Transparent

Table of Contents

Pillar I. Legal, Regulatory, and Policy Framework

Indicator 1. The public procurement legal framework achieves the agreed principles and complies with applicable obligations

Sub-indicator 1(a) Scope of application and coverage of the legal and regulatory framework

The legal and regulatory body of norms complies with the following conditions:

Assessment criterion 1(a)(a):
Is adequately recorded and organized hierarchically (laws, decrees, regulations, procedures), and precedence is clearly established.

Conclusion: No gap

Qualitative analysis

The procurement legal and regulatory framework is well recorded and organised hierarchically. The Constitution addresses procurement and other governmental contracts, requiring Acts of Parliament to prescribe public procurement procedures and provide for the negotiation and performance of state contracts. The Public Procurement and Disposal of Public Assets Act prescribes and regulates public procurement procedures, with further details set out in secondary legislation in the form of Regulations and supported by circulars, including directives, and technical guidance issued by the Procurement Regulatory Authority of Zimbabwe (PRAZ).

Constitution: S.315 of the Zimbabwe Constitution regulates procurement and other governmental contracts. The section provides that (1) An Act of Parliament must prescribe procedures for the procurement of goods and services by the State and all institutions and agencies of government at every level, so that procurement is effected in a manner that is transparent, fair, honest, cost-effective and competitive; (2) An Act of Parliament must provide for the negotiation and performance of the following State contracts- joint-venture contracts; contracts for the construction and operation of infrastructure and facilities; and concessions of mineral and other rights; to ensure transparency, honesty, cost-effectiveness and competitiveness.

Public Procurement Act: The Act of Parliament referred to in S.315 of the Constitution is the 2018 Public Procurement and Disposal of Public Assets Act [Chapter 22:23], as amended (PPDPAA).[1] The PPDPAA prescribes and regulates procurement procedures and establishes the Procurement Regulatory Authority of Zimbabwe (PRAZ) as the authority responsible for public procurement in Zimbabwe. S.101 of the PPDPAA provides for Ministerial Regulations to be made to carry out or give effect to the PPDPAA.

Public Procurement Regulations: The Public Procurement and Disposal of Public Assets (General) Regulations [Cap 22:23][2] (PPDPA Regulations) were published in 2018 pursuant to S.101 of the PPDPAA and have subsequently been amended.

Supporting technical guidelines and instructions: S.5 of the Act establishes the Procurement Regulatory Authority of Zimbabwe (PRAZ) as the authority responsible for regulating public procurement in Zimbabwe. To this end, S.6(1)(c) empowers the PRAZ to issue technical guidelines and instructions regarding the interpretation and implementation of the PPDPAA.

Gap analysis

Recommendations

1 Public Procurement and Disposal of Public Assets Act [Chapter 22:23], 01 January 2018, as amended. https://zimlii.org/akn/zw/act/2017/5/eng@2020-02-07

2 Public Procurement and Disposal of Public Assets (General) Regulations, 2018 Statutory Instrument No.5 of 2018, as amended. Original: https://www.veritaszim.net/node/3395

Pillar I. Legal, Regulatory, and Policy Framework

Assessment criterion 1(a)(b):
It covers goods, works and services, including consulting services for all procurement using public funds.

Conclusion: No gap

Qualitative analysis
S.3(1) of the PPDPAA provides that it is applicable to all stages of the process of the procurement of goods, construction works and services by procuring entities and the disposal of public assets by procuring entities. It also applies to professional services procured by any person who is bound by a statutory tariff and procurement conducted by officers in charge of diplomatic or consular missions outside Zimbabwe.

S.2 of the PPDPAA Interpretation includes definitions:
"goods" mean things of any kind or description, including— (a) raw materials, products and equipment; (b) things in solid, liquid or gaseous form; and (c) electricity; and (d) services incidental to the supply of the goods, where the value of the services does not exceed that of the goods themselves.
"construction work" means all work associated with the construction, reconstruction, demolition, repair or renovation of any building or infrastructure, and includes— (a) site preparation, excavation work, the installation of equipment or materials, decoration and finishing; (b) incidental services such as drilling, mapping, photography and environmental and seismic investigation, where— (i) the services are provided pursuant to a procurement contract; and (ii) the value of the services does not exceed that of the construction work itself.
"service" means a procurement requirement that is performed through a consultancy or non-consultancy service.
"consultancy service" means a service of an intellectual and advisory nature, and "consultant" shall be construed accordingly.

S.2 of the PPDPAA defines a procuring entity (PE) as (a) a Ministry, department or other division of the Government; (b) a corporate body established by or in terms of any Act for special purposes laid down in that Act; or (c) any company in which the State has a controlling interest, whether by virtue of holding or controlling its shares or by virtue of a right of appointment of members to its controlling body or otherwise, and includes any company which is a subsidiary, as determined in accordance with S.143 of the Companies Act *[Chapter 24:03]*, of such a company; or (d) a provincial or metropolitan council or a local authority; or (e) any partnership or joint venture between the State and any person, which is prescribed in terms of this Act or the Public Finance Management Act *[Chapter 22:19]* (No. 11 of 2009). Sub-paragraph (c) relates to state-owned enterprises (SOEs), therefore, SOEs are regulated by the PPDPAA, save where exemptions granted pursuant to the PPDPAA apply (see below and further analysis of procuring entities and their mandates at 6(a)(a)).

The PPDPAA does not apply to the procurement or acquisition of any fiscal agency or depositary services, the liquidation and management services for regulated financial institutions or services related to the sale, redemption and distribution of public debt, including loans and government bonds, notes and other securities or arbitration or conciliation services and public employment contracts. It further excludes defence procurement, anybody exempt by PRAZ for good cause shown and any public asset exempted by the Minister with approval from PRAZ and by notice in the Gazette.

S.3(6) of the PPDPAA provides that "the President, may by notice in the Gazette declare that it would be contrary to the interest of defence, public security or the national interests of Zimbabwe for the procurement or disposal of any construction works to be publicly disclosed and thereupon this Act shall apply to the procurement or disposal of such works with whatever modifications may be necessary to ensure that information concerning such works, or their procurement or disposal, is not disclosed to the prejudice of the defence, security or national interests of Zimbabwe." However, to date, no exemptions have been issued pursuant to this section.

S.3(7) of the PPDPAA regulates exemptions which may be granted by PRAZ from certain provisions of the PPDPAA. S.3(7) of the PPDPAA provides that: "The Authority, for good cause shown, may by written notice to the body concerned exempt any procuring entity from compliance with any provision of this Act, and thereupon the provision concerned shall not apply to that procuring entity, provided that the Authority shall ensure that a copy of any such exemption is kept at its offices and is open to inspection there by interested persons at all reasonable times." Paragraph 8.1.6 of the 2024 PRAZ Annual Report indicates that the Operations Division exempted 69 PEs from following certain provisions of the PPDPAA. All PEs were, on request, granted authority to shorten the bidding period to manage exchange rate fluctuations.[3] Requests for extending the adjudication period were also granted. 69 PEs which operate in competitive markets were exempted and 1228 general exemptions and guidance requests for all PEs were granted pursuant to S.3(7).

In terms of S.3(8) of the PPDPAA, the Minister, with the approval of PRAZ, may exempt any public asset from the application of Part XII of the PPDPAA. R.3(1) and (2) exempt special purpose vehicles[4] and the leasing of facilities or amenities for sporting purposes or a specific event, and accommodation for office space or other purpose for a period not longer than three years.

S.3(9) of the PPDPAA provides, in summary, for the President of the Republic of Zimbabwe, by notice in the *Gazette,* to exempt a prescribed public entity from application of the PPDPAA for a specified period. Sections 3(10) to 3(14) set out provisions concerning compliance by exempted entities with procurement guidelines issued by PRAZ. (For further analysis, see criterion 6(a)(a)).

Gap analysis

Recommendations

Assessment criterion 1(a)(c):
PPPs, including concessions, are regulated.

Conclusion: No gap

Qualitative analysis
PPPs are regulated by the Zimbabwe Investment and Development Agency Act.

PPPs are regulated by the Zimbabwe Investment and Development Agency Act (ZIDA Act) Chapter 14:37 and in certain cases the PPDPAA as directed in S.3(3) of the Fourth Schedule to the ZIDA Act. S.47(1)(a) defines a PPP entity as the entity resulting from a PPP agreement concluded under the ZIDA Act. S. 1(1) of Part I of the Fourth Schedule to the ZIDA Act defines a PPP agreement as an agreement between a contracting authority and a counterparty, approved under the ZIDA Act, in terms of which (a) the counterparty undertakes to perform a contracting authority's function on behalf of the contracting authority for a specified period; and (b) the counterparty receives a benefit for performing the function by way of (i) compensation from funds appropriated by Parliament; (ii) funds obtained by way of loan by the contracting authority; (iii) user levies; (iv) revenue generated from the project; (v) any combination of the foregoing and (c) the counterparty is liable for the risks arising from the performance of its function and (d) public resources[5] may be transferred or made available to the counterparty and includes any of the types of agreement specified in Part III of the Schedule.

Gap analysis

Recommendations

Assessment criterion 1(a)(d):
Current laws, regulations and policies are published and easily accessible to the public at no cost.

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[3] During discussions with the MAPS Assessment Team during December 2025, the PRAZ legal team confirmed that these exemptions were largely for PEs in the health sector.

[4] These are legal entities created for a specific and well-defined purpose, meaning the provision or procurement of goods, services or works for the benefit of the PE in R.3(1).

[5] "Public Resources" has the meaning in Public Finance Management and is defined as public money and state property.

Conclusion: Medium risk gap

Qualitative analysis

The PPDPAA, some circulars, PRAZ procurement manual, technical guidelines and instructions and bidding documents are available online and can be downloaded at no cost from the PRAZ website. However, the information available to download from the PRAZ website is incomplete: neither the PPDPA Regulations, nor amendments to the PPDPPA or a complete collection of updated circulars are available. [6]

Gap analysis

There is no comprehensive, up to date collection of current public procurement laws, regulations and policies easily accessible to the public from a single online portal. In the absence of wide and easy access to all procurement laws, regulations and policies, transparency of the procurement system is reduced and may have a negative impact on competition.

Recommendations

To enhance transparency and competition, publish a comprehensive clearly identifiable collection of all procurement laws, regulations and policies at a single online location, to be decided by PRAZ, which is easily accessible to the public. The single online location should be clearly designated as the central resource for procurement legal and regulatory documents.

See also, 2(a)(b) on availability of circulars and 7(a)(a) on eGP and availability of relevant documents.

Sub-indicator 1(b)
Procurement methods
The legal framework meets the following conditions:

Assessment criterion 1(b)(a):
Procurement methods are established unambiguously at an appropriate hierarchical level, along with the associated conditions under which each method may be used.

Conclusion: No gap

Qualitative analysis

Procurement methods are regulated in Part VI of the PPDPAA and the associated conditions under which each method may be used is found in Part III of the of the PPDPA Regs. Financial thresholds for each of the methods is found in R.10 of the PPDPA Regs.

Gap analysis

Recommendations

Assessment criterion 1(b)(b):
The procurement methods prescribed include competitive and less competitive procurement procedures and provide an appropriate range of options that ensure value for money, fairness, transparency, proportionality and integrity.

Conclusion: No gap

Qualitative analysis

[6] The PPDPAA, PPDPA Regulations and some other procurement related legal framework documents are also accessible online from other locations such as at https://www.veritaszim.net/ and https://zimlii.org/legislation/ but those are not consolidated collections of all procurement related current laws, regulations and policies and are not necessarily complete or fully updated.

The procurement methods prescribed include competitive and less competitive methods, two stage tendering as well as simpler methods for low value procurements, ensuring an appropriate range of options. The methods include competitive bidding, restricted bidding, request for quotations and direct procurement.

The thresholds for conducting procurement at PE level are as follows:[7]
Competitive bidding: USD 200 000 for works, USD 100 000 for goods and USD 50 000 for services.
Request for quotations: USD 20 000 for works, USD 10 000 for goods and USD 5 000 for services for items not covered under a framework agreement.

In the case of procurement between USD 20 000 - USD 5 million for works, USD 10 000 – USD 300 000 for goods and USD 5 000 – USD 1 million for services, PEs may only invite domestic suppliers.
Where procurement exceeds USD 5 million for works, USD 300 000 for goods and USD 1 million for services, PEs may invite bids from both domestic and foreign bidders.

Gap analysis

Recommendations

Assessment criterion 1(b)(c):
Fractioning of contracts to limit competition is prohibited.

Conclusion: No gap

Qualitative analysis
Fractioning (division) of contracts to limit competition is prohibited.

S.25(2)(a) of the PPDPAA prohibits the division of a procurement requirement in order to avoid financial thresholds. Where a procurement requirement that could be procured through a single procurement contract is divided into lots, the PE must permit bidders to bid for a single lot, any combination of lots and ensure that the contract or any combination of contract offers the best overall value for money. A procurement requirement is defined in S.2 of the PPDPAA as the goods, construction work or service to be acquired by procurement.

Gap analysis

Recommendations

Assessment criterion 1(b)(d):
Appropriate standards for competitive procedures are specified.

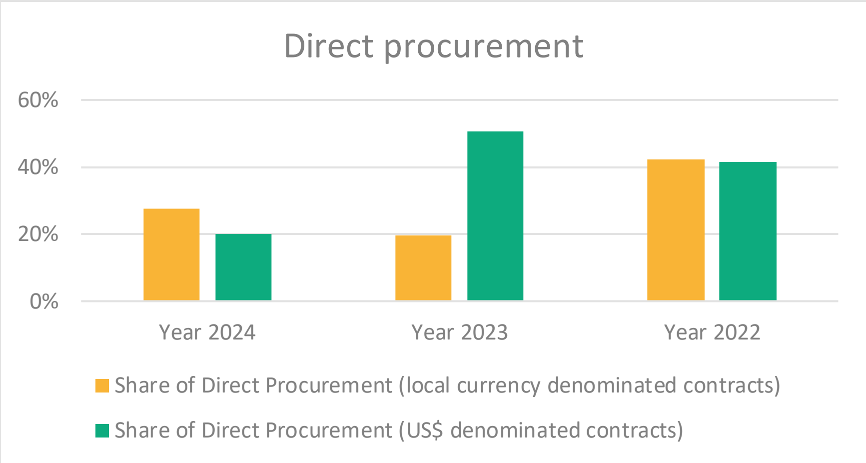
Conclusion: High risk gap

Qualitative analysis
Provisions in the legal framework in theory restrict individual agencies' and procurement officials' discretion, which should limit the use of less competitive procurement methods. However, in practice, quantitative data indicates that the use of less and non-competitive procurement methods is high, pointing to over-use of permitted exceptions from use of competitive bidding. This flags the need to review and amend the legal provisions with the objective to ensure that provisions are sufficiently robust to limit use of non-competitive methods to exceptional circumstances only

Provisions in the legal framework in theory restrict individual agencies' and procurement officials' discretion, thus limiting the use of less competitive procurement methods. Quantitative data indicates that the use of less and non-competitive procurement methods is high. This is evidenced by the 2024 PRAZ Annual Report which indicates the

[7] Statutory Instrument 219 of 2020.

number of direct procurements in 2024 as 49 368, which represents 20% of USD denominated contracts and 28% of the local currency denominated contracts, as shown below.



Source: 2024,2023, 2022 PRAZ Annual Reports

S.30 of the PPDPAA provides that the default method of procurement is competitive bidding except where restricted bidding, direct procurement, or request for quotations is used. Restricted bidding entails a process in which bidders are limited to those selected or invited by the PE and may be used (a) when the time and cost of considering a large number of bids is disproportionate to the estimated value of the procurement requirement; (b)where urgency renders impracticable the time-limit prescribed for the purpose of S.39, provided that the urgency shall not be due to the procuring entity's unjustifiable delay; or (c) for procurement contracts with an estimated value that does not exceed the prescribed threshold. See criterion 9(b)(a) for practical analysis of this procurement method. In the case of consulting services, a request for proposals method is used. When a joint venture or PPP entity is formed, the method used is prescribed by S.100 and the ZIDA Act. S.30(2) provides that where a method other than competitive bidding is used, the PE must record a written justification, including the grounds for this decision.

Direct procurement: In summary, the parameters for direct procurement are provided in S.33(2) are: where no responsive bids in response to a competitive bidding procedure have been received; for technical or artistic reasons the contract can be performed only by a particular supplier; in cases of extreme urgency; in the case of additional supplies of goods or services by the supplier where a change of supplier would cause problems of inter-changeability or incompatibility with existing equipment or discontinuity of services; procurement of a prototype or a first product or service from a research institute; additional services not exceeding 50% of the original contract; new services that repeat similar services that were awarded following a competitive bidding method; acquisitions made under exceptionally advantageous conditions from unusual disposals; procurement of immovable property; procurement of spare parts of a proprietary nature. R.16 to the PPDPA Regs. provides only that the bid should comply with the specifications set and that the bidder's price should not be excessive or substantially in excess of prevailing market prices, in which case negotiation to decrease the price is permitted. No further substantive guidance is provided for the exercise of discretion in the case of direct procurement. "Extreme urgency" and "exceptionally advantageous conditions" are not defined in the PPDPAA.

Choice of procurement methods: In response to the Private Sector survey, 47% of the 449 respondents are of the view that procurement methods are "sometimes"" proportionate to the risk and value of the procurement and 10% are of the view that procurement methods are "never" proportionate to the risk and value of the procurement. Only 12% of respondents agreed that procurement methods are proportionate to the risk and value of the procurement. *See analysis at 10(b)(b).*

Gap analysis

1. Although the law provides that competitive bidding is the default method of procurement and that written justification should be given for the use of direct procurement, procurement data shows high usage of the method.
2. In cases where additional services are obtained, the requirement of 50% constitutes half of the procurement that was competitively obtained. In light of the high use of direct procurement overall, the provision in S.33(2) PPDPAA permitting direct procurement of additional services up to 50% of the original competitively awarded contract seems generous and may be open to abuse.
3. Lack of clear definitions for "extreme urgency" in S.33(2)(c) and "exceptionally advantageous" in S.33(2)(h) lead to uncertainty as to instances when these exceptions may be used.

The overuse of direct procurement and urgent/advantageous exceptions to competitive bidding reduces transparency and trust in the procurement system. It also has a negative impact on opportunities for competition and development of competitive markets for current and new entrants and jeopardises value for money outcomes.

Quantitative data indicates that only 12% of respondents are of the view that procurement methods are proportionate to the risk and value of a particular procurement.

Recommendations

A general review of S.33(2) of the PPDPAA is recommended to evaluate its fitness for purpose, with the following specific recommendations:

1. Consider amending S.33 to ensure each exception allowing direct procurement is framed in language that permits its use in clearly exceptional circumstances only, that each exception is fit for purpose and that clear reasons for its use be provided as similarly done at Article 30(5) of the UNCITRAL Model Law on Public Procurement 2011.
2. Given the high usage of direct procurement, a reduction of the percentage of additional goods and services that can be procured outside a competitive bidding procedure is recommended. The provision should ensure that this should be used in exceptional cases only when fit for purpose and ensure that use of the provision is not open to abuse.
3. Clearly define "extreme urgency" and "exceptionally advantageous conditions" to ensure that direct procurement is used only in circumstances clearly enumerated in the definitions.

As part of the review of systemic constraints on bidder participation recommended under 10(b)(b), explore with the supplier community the reasons for the predominant view in response to the Private Sector survey that procurement methods are not proportionate to the risk and value of a particular procurement. If legal drafting issues are identified as part of the problem, this should also be addressed, potentially in parallel with consideration of amendments to S.33(2) of the PPDPAA.

Sub-indicator 1(c)
Advertising rules and time limits
The legal framework meets the following conditions:

Assessment criterion 1(c)(a):

The legal framework requires that procurement opportunities are publicly advertised, unless the restriction of procurement opportunities is explicitly justified (refer to indicator 1(b)).

Conclusion: Medium risk gap

Qualitative analysis

The legal framework requires public advertisement of procurement opportunities, but it does not provide for or regulate the online publication of procurement opportunities in line with the eGP system. Current provisions and practices reduce clarity for bidders, has negative cost implications and are susceptible to legal challenge.

S.38(2) requires bid notices to be published in the Gazette and at least one newspaper of wide enough circulation or to the extent feasible, on the internet and the PRAZ website. Bid notices may also be broadcast on the radio or television to reach a wide audience. However, the legal framework (PPDPAA & PPDPA Regs) do not provide for or regulate the online publication of bids based on the rollout of eGP. S.40(6) of the PPDPAA provides that "a procuring entity may establish an electronic system approved by the Authority for the purpose of this section." This provision is broadly written and does not adequately provide for the legal authority to publish tenders on the eGP system.

In January 2026 there are parallel systems in operation spanning both eGP and paper-based procurement that requires PEs to advertise both in the Gazette (at cost) and on the eGP system. The eGP system is intended to promote a more efficient procurement environment and reduce overall procurement costs.[8] This intention is thwarted by a duplication of administrative activities and additional costs for advertising of procurement opportunities.[9] At January 2026, charges for advertising in the Gazette are USD 284 per standard tender notice and USD 0.65 for a non-standard tender notice by word count. The cost implication of this can be rectified by enacting legal provisions that authorise the exclusive use of eGP in areas where it has been fully rolled out such as public advertising of procurement opportunities, eliminating the need for a parallel paper-based system and increasing efficiency. (See criterion 1(j)(a) for enactment of transitional provisions where necessary.) This is applicable in all instances where specific actions are taken under the eGP system without the underpinning legal authority.

See 1(j)(a) for analysis, Gap and Recommendations on the legal mandate for implementing and mandating use of eGP.

Gap analysis

As of January 2026, the use of eGP is standard in the Zimbabwean public procurement regime. The legal framework requires public advertisement, however, the PPDPAA and its Regs which contain enabling provisions for procurement actions, do not specifically provide for or regulate the online publication of procurement opportunities in line with use of the eGP system. The lack of these specific provisions results in reduced clarity for bidders and potentially limits access to and transparency of opportunities. It also has negative cost and efficiency implications for procuring entities who, despite the use of eGP for advertising opportunities, are still required to publish notices in the Gazette. It further reduces clarity for PEs as to how procurement will be conducted. In addition, the action of publishing opportunities online in the absence of adequate legal authority may be susceptible to legal challenge.

Recommendations

The procurement regulatory framework should mandate advertising procurement opportunities using the eGP portal. Procuring entities should be free to advertise elsewhere at their discretion. Where adequate access to online opportunities is a justified concern, mandated additional locations for advertising such as the Gazette should be considered as a short-term transitional practice only.

Assessment criterion 1(c)(b):

Publication of opportunities provides sufficient time, consistent with the method, nature and complexity of procurement, for potential bidders to obtain documents and respond to the advertisement. The minimum time frames for submission of bids/proposals are defined for each procurement method, and these time frames are extended when international competition is solicited.

Conclusion: No gap

Qualitative analysis

Sufficient time is allowed for publication of procurement opportunities and minimum time frames are extended for international competitions.

R. 19(1) provides that bidders are given 20 days to submit their bids in the case of competitive bidding for national bidders and 40 days where competitive bids are solicited from national and international bidders. Where pre-qualification is applicable, bidders are given at least 15 days to submit their bids.

[8] eGP system - according to PRAZ website homepage https://www.praz.org.zw/.

[9] S.40(3) provides that a PE shall not charge more for bidding documents than the cost of printing and distributing them, and where they are delivered by electronic means they shall be free of charge.

Gap analysis
Recommendations
Assessment criterion 1(c)(c): Publication of open tenders is mandated in at least a newspaper of wide national circulation or on a unique Internet official site where all public procurement opportunities are posted. This should be easily accessible at no cost and should not involve other barriers (e.g. technological barriers).
Conclusion: No gap
Qualitative analysis Publication of open competitive tenders is mandated in a newspaper of wide national circulation and elsewhere. As eGP system is rolled out and fully adopted, publication on the eGP system should be the mandated location. S.38(2) of the PPDPAA requires bid notices to be published in the Gazette and at least one newspaper of wide enough circulation or to the extent feasible, on the internet and the PRAZ website. Bid notices may also be broadcasted on the radio or television to reach a wide audience. Where the estimated value of the procurement contract exceeds the financial threshold for international procurement, the notice of invitation to bid must be published in at least two publications widely used for international trade or other printed media with adequate circulation to attract foreign competitive bidders and posted on widely read websites and posted on Zimbabwe's foreign diplomatic and consular missions. For the purpose of ensuring wide distribution, the invitation may be sent directly to chambers of commerce or trade or professional associations after it has been publicly published. *See criterion 1(c)(a) for analysis, Gap and Recommendations regarding clear legal provisions necessary to underpin use of the eGP system for publication of open tenders*.
Gap analysis
Recommendations
Assessment criterion 1(c)(d): The content published includes enough information to allow potential bidders to determine whether they are able to submit a bid and are interested in submitting one.
Conclusion: No gap
Qualitative analysis The content of bid notices provides sufficient information to allow potential bidders to determine whether they are interested and able to submit a bid. S.38 of the PPDPAA provides that the notice includes (a) the identity and address of the PE and contact details of the person from whom further information can be obtained; (b) a description of the procurement including the place of delivery of the goods or services; (c) how bidding documents and if applicable, pre-qualification documents can be obtained and its price; (d) the place and time at which bids must be submitted and (e) other matters that may be prescribed or set out in standard form issued by the PRAZ.
Gap analysis
Recommendations
Sub-indicator 1(d)

Pillar I. Legal, Regulatory, and Policy Framework

Rules on participation The legal framework meets the following conditions:
Assessment criterion 1(d)(a): It establishes that participation of interested parties is fair and based on qualification and in accordance with rules on eligibility and exclusions
Conclusion: No gap
Qualitative analysis Provisions on eligibility and qualification of interested parties are set out in the PPDPAA together with grounds for exclusion. **Eligibility:** S.28(2) of the PPDPAA regulates the eligibility of bidders and requires that they (a) meet specified ethical standards; (b) have the legal capacity to enter into a procurement contract; (c) be solvent; (d) have paid all taxes, duties and rates; (e) none of their officers have in the 5 years immediately preceding the procurement have been convicted of any offence related to their professional conduct in any jurisdiction or have not been censured or subjected to any penalty in any country following disciplinary proceedings arising from conduct involving false statements or misrepresentations and (f) any other criteria that will demonstrate their professional and technical competence, financial resources, equipment, physical facilities, managerial capability, experience, business reputation and personnel needed to perform the contract. S. 28(3) requires that a PE not impose eligibility criteria that are unduly restrictive or designed to reduce competition. **Qualification:** S.28(4) provides that any requirements pursuant to S.28 must be set out in the pre-qualification document and if any, in the solicitation documents. The requirements will apply equally to all bidders. Module 6.4 on page 65 of the Procurement Manual provides that where no pre-qualification was conducted, the recommended bidder's qualification documents should be in its bid and assessed against the qualification criteria set out in the bidding document.
Gap analysis
Recommendations
Assessment criterion 1(d)(b): It ensures that there are no barriers to participation in the public procurement market.
Conclusion: High risk gap + red flag
Qualitative analysis Access to finance (both government and private) and fees payable by suppliers for registration as suppliers and for participation in public procurement processes are identified as a barrier to participation in the public procurement market. Suppliers are required to pay fees for registration as suppliers and for participation in individual procurement processes. Direct engagement with suppliers and results of the Private Sector Survey indicate that the combined effect of these fees has the potential to create barriers to entry, particularly for micro, small and medium enterprises (MSMEs as defined by the Small and Medium Enterprises Act Chapter 24:12) and women-owned businesses. In January 2026, registration fees for domestic suppliers were reduced and differential fees for micro, small and medium enterprises were introduced. It is too early to know what the real impact of reductions in these and other fees will be on participation and competitiveness. **Preference:** S.29 of the PPDPAA provides that a PE may give preference to bids from Zimbabwe or local manufacturers or suppliers. R.8 of the PPDPA Regs requires that circulars published by PRAZ must clearly state the eligibility for domestic preference, the documentation required to prove domestic preference, the percentage of allowable preference and the manner in which it will be evaluated. Whenever domestic preference is applied, R.8(5) provides that bids should be divided into 2 groups – group A for bids exclusively from Zimbabwe and group B for bids from international suppliers of goods that have already been imported or will be directly imported. The lowest

in each group is then established and compared, taking into account their total cost, including insurance and all duties and taxes. If the lowest bid from group A is lower than the lowest bid in group B, the former bid wins and vice versa. This mechanisms for providing preference does not create a barrier to international bidders provided their bid is lower than that of a domestic bidder including the amount equal to the allowable domestic preference. Thresholds for domestic preference is regulated in Circular 33 of 2022.[10] The percentage of domestic preference in the case of goods is 20% and 10% in the case of services and do not seem prohibitively high. As January 2026, guidelines for affirmative procurement are being drafted.

Access to finance: Based on quantitative data from the anonymous MAPS Assessment Private Sector Survey ("Private Sector Survey") only 17% of respondents are of the view that it is easy to access government controlled finance. Conversely, 83% are of the view that government-controlled financing to participate in public procurement is not accessible and further exploration with private sector stakeholders, including MSMEs, flagged problems with meeting the conditions for receipt of funding for their businesses. Examples of financing and related measures external to the procurement system and of particular benefit to MSMEs include targeted loans, micro-financing, focused development funding, flexible security and collateral arrangements. Accessing private finance can also be problematic for existing suppliers to government due to significant delays in payment of sums due under Government contracts, negatively affecting cash flows which then impact on credit assessments and availability of finance.[11]

Fees paid by suppliers for registration: In 2025, annual fees payable by suppliers for registration (per category of activity) were USD 120 for domestic suppliers (with an option to pay quarterly) and USD 850 for international suppliers. The Private Sector Survey conducted in September/October 2025 asked suppliers whether "the costs of registration as a supplier/contractor/consultant are reasonable and affordable." A significant minority (43%) responded negatively to this question. Direct engagement in 2025 with suppliers and MSMEs in particular, flagged concerns as to the prohibitive costs to business of registration as a supplier, including the need for multiple registrations for different categories in some sectors. This is a potential barrier to entry.
As of January 2026, with the publication of Statutory Instrument 9 of 2026, registration fees for domestic suppliers have been reduced from USD 120 per annum and differential fees have been introduced. Fees are now payable by domestic suppliers according to three levels of classification: (1) micro-enterprises (USD 50 per annum) (2) small or medium enterprises (USD 60 per annum) and (3) suppliers who are not micro or small or medium enterprises (USD 75 per annum). Registration fees for international bidders remain high.

Fees paid by suppliers for participation: Other fees are payable by bidders which are linked to participation in individual procurement processes. These include SPOC review fees for valuable or especially sensitive contracts and fees for bid securities arranged through PRAZ. The Private Sector Survey conducted in September/October 2025 asked suppliers whether "the costs of participation in a procurement process are reasonable and affordable". 65% responded negatively to this question and direct engagement with suppliers reinforces this finding. This is a potential barrier to entry.
SPOC review fees have been reduced with effect from 01 January 2026 for domestic competitive tenders. Fee levels are now: USD 150 for tenders for domestic goods, consultancy and non-consultancy services (reduced from USD 350) and USD 200 for construction works tenders (reduced from USD 400). SPOC review fees for international competitive tenders have not changed, neither have fees for bid securities.

Fees payable by suppliers/bidders for registrations, participation in procurement and contract management

[10] Public Finance Management Treasury Instructions 144 of 2019 provide in S.8 that the main purpose of Treasury Circulars and Circular Minutes is "to provide guidance and information and to request financial information." They cover matters that are outside the scope of Treasury Instructions and may cover matters that are to take effect immediately. They should be complied with in the same way as Treasury Instructions.
[11] Feedback from suppliers/representatives in direct engagement and in MAPS Private Sector Survey. *See also, analysis at 4(b)(b) on Invoicing and payment and the need for improvements in Treasury management processes and practices which lie outside the procurement sphere.*

January 2026				
Fee type	**Fees payable**			**Frequency**
Registration	Domestic bidders	Micro (M)	USD 50	Annual (can be paid quarterly)
		Small/medium (SME)	USD 60	
		Non MSME	USD 75	
Annual renewal of registration	International bidders		USD 850	Annual
Administration fees for bids subject to review by SPOC	Domestic competitive tenders for goods and consultancy and non- consultancy services		USD 150	Per relevant contract
	Domestic competitive tenders for construction works		USD 200	
	International competitive tenders for goods and consultancy and non- consultancy services		USD 400	
	International competitive tenders for construction works		USD 500	
Bid encryption fee – annual	International bidders only		USD 50	Annual
Administration fees for bid security established by PRAZ	Sliding scale according to whether domestic/foreign, value and bid security period, % for high value bid security		USD 130 to 7,500 3.5% to 5%	Per bid process
Annual administration fees payable by contractors	Sliding scales, % or fixed fees according to contract value			Per contract
	Domestic bids and description for domestic bidders		2%/USD 400 to 0.5%/USD 20,000	
	Direct procurement bids and description for international bidders		1%/USD 25,000	
	International bids and description for international bidders		USD 600 to USD 180,000	
Administration (handling) fees on refund requests on non-refundable deposits	Domestic		5%	Per request
	Foreign		10%	

Fees for participation of international companies or firms in construction contracts: S.28 of the PPDPAA provides that bidders are permitted to participate in procurement proceedings without regard to nationality except as prescribed under the Act or any other enactment. Statutory Instrument 193 of 2022 prescribes administration fees for domestic bidders ranging from USD 120 – 20,000. For international bidders the administration fees range from USD 850 – 180,000 and are exponentially more than for domestic bidders which is a potential barrier to entry. The new Statutory Instrument 9 of 2026 has not fundamentally reduced fees for participation of international bidders which remains a barrier. In discussions with the MAPS Assessment Team, PEs also referred to difficulties in attracting foreign bidders due to high fee levels.

Gap analysis

Barriers to participation in the public procurement market have the potential to create monopolistic conditions that promote participation of certain groups of bidders only and can become a de facto barrier to participation. Where barriers to entry exist, these can reduce the appetite of potential suppliers to participate in public procurement processes thus reducing competition and potentially reducing opportunities for new entrants to consider the public procurement market as a viable market for growth. The MAPS Assessment team identified the following barriers in particular:

Access to finance: A large majority of survey respondents perceive the access to government financing to be a prohibition to the procurement market. This barrier results in bidders not having adequate financing to participate in a public procurement process. In direct discussions with the MAPS Assessment team, representative of the private sector, in particular MSMEs commented that conditions for receipt of funding are extremely difficult to meet.
► This Gap is assigned a Red flag because revised access to finance mechanisms/actions to resolve the gap lie the procurement sphere, for example in the case of government finance with relevant government ministries.

Fees for supplier registration and for participation in public procurement processes: High fees for registration and participation in the procurement process prohibit bidders from participating in the public procurement market and this was confirmed by private sector survey sector respondents. A financial barrier to MSMEs may create a monopolistic procurement market in which only well-resourced bidders can participate, resulting in a MSME market that remains underutilised and undeveloped. The introduction of reduced registration fees for domestic suppliers, with lower fees payable by MSMEs, should help to lower this barrier to entry but it is too early to know what the real impact of reductions in these and other fees will be on participation and competitiveness.
Fees payable by international bidders: Fees for registration and participation in the procurement for international bidders are exponentially higher than those for domestic bidders, creating a barrier to entry.

Recommendations
Access to finance: The government should ensure that measures are in place to provide more accessible funding for the private sector, particularly MSMEs, to enhance their financial standing and thus opportunities to participate as bidders in the procurement market to ensure competition. These measures should ensure that the conditions for accessing government funding are realistically achievable for MSMEs. Opportunities for funding should be widely publicised to ensure that the entire bidder community has equal access.
Fees for supplier registration and for participation in public procurement processes: PRAZ to publicise changes in the fees payable, paying particular attention to effective engagement with MSMEs to further encourage participation in the public procurement market. Collect relevant data to enable monitoring of registration, participation in procurement and award of contracts by reference to the three classes of domestic bidders in 2026 and on an ongoing basis, to determine the effect of the reduced fees. In absence of an increase in bidder numbers, consider obtaining feedback from bidders on the new fee schedule.
Fees payable by international bidders: PRAZ to consider decreasing the cost of participation by international bidders to remove the barrier experienced by international bidders to induce fair participation.

Assessment criterion 1(d)(c):
It details the eligibility requirements and provides for exclusions for criminal or corrupt activities, and for administrative debarment under the law, subject to due process or prohibition of commercial relations.

Conclusion: No gap

Qualitative analysis
The legal framework regulates eligibility of bidders and provides for exclusions for criminal and corrupt activities. There is a system for administrative debarment, subject to due process and the list of debarred contractors is published on the PRAZ website.

Eligibility: Eligibility of bidders is regulated in S.28(2) of the PPDPAA. In summary it requires that bidders meet ethical standards, have the legal capacity to enter into contracts, that they are not insolvent, in liquidation or under judicial management or their affairs administered by a court of judicial officer or that their businesses have not been suspended or no legal proceedings are pending for any of these matters. It is also required that they have paid all taxes, duties and rates and that neither they nor their officers have prior to procurement proceedings been convicted, in any country, of any offence related to their professional conduct or the making of false statements or misrepresentations as to their qualifications or have been censured or subjected to any penalty in any country in relation to the same issues. It further requires any further criteria as to a bidder's technical qualifications, financial resources, equipment and other physical facilities, managerial capability, experience, business reputation and personnel needed to perform the contract.

Exclusions: S.72(3) of the PPDPAA provides for the exclusion of bidders from a procurement process where they have been convicted of an offence involving dishonesty, corruption, obstruction of justice or lack of honesty or business integrity or anti-competitive practices, whether or not it involves collusion. The section further prohibits bribery or soliciting confidential information to obtain an unfair advantage.

Debarment: Part XI of the PPDPA Regs provide for debarment of contractors. R.73(2) provides that before reaching a decision of recommending a contractor for debarment, and before imposing any sanction on a bidder, the bidder or contractor must be given a reasonable opportunity to make representations. Grounds for debarment are set out in S.72(3) of the PPDPAA and the process for and decision on debarment involves establishing a debarment committee in terms of R.72. There is a debarment list on the PRAZ website accessible from the PRAZ homepage by clicking the "Debarment List" tab.[12]

Gap analysis

Recommendations

Suggestions for improvement
Publication of debarment decisions: Subject to protecting commercially confidential information, publicly available debarment decisions or summaries thereof will enhance transparency and increase confidence in the debarment system.
Eligibility requirements: Include in the legal and regulatory framework specific provisions listing grounds for ineligibility due to conviction by final judgment for specified organised crime, terrorist and trafficking offences (participation in a criminal organisation; terrorist offences or offences linked to terrorist activities, or inciting or aiding or abetting or attempting to commit such an offence; money laundering or terrorist financing; child labour; and all forms of trafficking in human beings).

Assessment criterion 1(d)(d):
It establishes rules for the participation of state-owned enterprises that promote fair competition.

Conclusion: Medium risk gap

Qualitative analysis
S.4 of the SBD for large works provides that "[g]overnment-owned enterprises shall be eligible only if they can establish that they are legally and financially autonomous and operate under commercial law". Therefore, broad rules for the participation of SOEs in the procurement process for large works are available. No similar provision is found in any other SBD.

Gap analysis
There are no rules of comprehensive application for participation of state-owned enterprises as bidders in public procurement processes, to create a level playing field for all competitors.

Recommendations
As an initial step, include provisions in all standard bidding documents establishing rules for participation of state-owned enterprises in public procurement processes that promote fair competition and create a level playing field

[12] https://www.praz.org.zw/debarment-list/. At December 2025, 10 companies are listed on the PRAZ website as debarred of which 2 are permanently debarred.

of all competitors. In the longer term consider measures to embed these principles in the procurement legal/regulatory framework.
Ensure that eGP system functionalities enable collection of relevant data on participation of state-owned enterprises as bidders in public procurement processes, to facilitate analysis of levels of participation and impact on the market.

Assessment criterion 1(d)(e):
It details the procedures that can be used to determine a bidder's eligibility and ability to perform a specific contract.

Conclusion: No gap

Qualitative analysis
Procedures for determining a bidder's eligibility and ability to perform a specific contract are set out in the PPDPAA and PPDPA Regulations.

R.4 of the PPDPA Regs regulates the requirements for registration of bidders and contractors and provides in R.4(2) that the PRAZ retains a list of registered bidders and contractors that are eligible to bid and be awarded contracts. The requirements for eligibility for the list are found in R.4. Any additional requirements for contractors providing specialised goods, services and works must be specified in the invitation to bid.

S.28 of the PPDPAA sets out the requirements for contractor eligibility as discussed under criterion 1(d)(c). Under competitive bidding, pre-qualification of bidders is conducted based on the complex nature of the project and is regulated in S.31 of the PPDPAA and R.14 of the PPDPA Regs. It can also be used when the cost of preparing a detailed bid would discourage competition; the evaluation of bids is particularly complex and would take an extended amount of time to evaluate a large number of bids; or the bidding is for a group of similar contracts for the purpose of preparing a standing list. R.15(1) defines a standing list as a list of qualified bidders prepared for the purpose of procurement by the restricted bidding method

Gap analysis

Recommendations

Sub-indicator 1(e)
Procurement documentation and specifications
The legal framework meets the following conditions:

Assessment criterion 1(e)(a):
It establishes the minimum content of the procurement documents and requires that content is relevant and sufficient for suppliers to respond to the requirement.

Conclusion: No gap

Qualitative analysis
The minimum content of bidding documents and mandated information is relevant and sufficient for suppliers to understand and assess the opportunity and respond to the requirement.

The content of bidding documents is regulated in R.20 and provides that the bidding document shall include at least (a) the identity of the PE and address where further information can be obtained; (b) description of the procurement requirement including technical requirements and specifications; (c) the qualifications require for bidders who are not already pre-qualified with supporting documentations; (d) information related to site visits and pre-bid conferences; (e) instructions for preparation and submission of bids; (f) components to be reflected in the price; (g) bid validity period; (h) the criteria and methodology used for evaluating bids; (i) any applicable preference; (j) any grouping or sub-division of procurement into lots and packages; (k) alternatives to technical and contractual specifications; (l) whether bidders are permitted to submit for one or more portions of the procurement requirement and a description of the portion/s; (m) amount and form of performance security to be provided; (n)

declaration of no disbarment; (o) terms and conditions of the procurement contract; (p) obligations of the successful bidder regarding safe disposal of the procurement requirement; (q) restrictions on bidding arising out of conflicts of interest, anti-fraud or anti-corruption rules; (r) manner in which bidders can obtain a review of the PE's actions, omissions and decision and (s) other matters required in guidelines, manuals and appropriate forms published by the PRAZ. This content is relevant and sufficient for suppliers to respond to the requirements set.
Quantitative data indicates that 94% of respondents perceive bidding documents to be clear and understandable either sometimes, often or always.

Gap analysis

Recommendations

Assessment criterion 1(e)(b):
It requires the use of neutral specifications, citing international norms when possible, and provides for the use of functional specifications where appropriate.

Conclusion: No gap

Qualitative analysis
S. 27 of the PPDPAA regulates the description of the subject-matter of the procurement and provides in S.27(1)(v) that "any applicable standards, which, where possible, shall be international standards or Zimbabwean standards incorporating standards".

S.27(1)(a)(i)(ii) of the PPDPAA provides that a PE must ensure that its bidding documents set out clearly a full and appropriately detailed description of the procurement requirement that includes its function and the purpose for which its required and any requirements related to its performance. To this end, module 4.2. of the PRAZ Procurement Manual provides that PEs when preparing specifications must be suitable for use and include appropriate or functional standards. However, negotiation is largely prohibited in the procurement of goods and construction works. R.20(1)(k) which regulates the content of bidding documents provides that such documents must indicate whether alternative technical or contractual specifications will be considered, and if so, how they will be evaluated. Although the rules seem largely input-based, this regulation provides some flexibility.

Gap analysis

Recommendations

Assessment criterion 1(e)(c):
It requires recognition of standards that are equivalent, when neutral specifications are not available.

Conclusion: No gap

Qualitative analysis
S. 27(2) that the requirements of the procurement subject-matter "shall not refer to any particular trademark or brand name, or to any patent or design, or to any producer or service provider, unless there is no other practical way of describing the procurement requirement, in which event words such as 'or equivalent' shall be included in the specifications."

Gap analysis

Recommendations

Assessment criterion 1(e)(d):

Potential bidders are allowed to request a clarification of the procurement document, and the procuring entity is required to respond in a timely fashion and communicate the clarification to all potential bidders (in writing).

Conclusion: No gap

Qualitative analysis

S. 41(1) of the PPDPAA provides that "a procuring entity shall respond promptly and in writing to a written request from a bidder for clarification of any bidding document, and the response shall be communicated simultaneously to all the bidders without identifying the bidder that requested the clarification and in a manner that does not disclose the identities of the other bidders." R.21 in turn regulates the clarification of procurement documents and R.22 the modification of procurement documents.

Gap analysis

Recommendations

Sub-indicator 1(f)
Evaluation and award criteria
The legal framework states that:

Assessment criterion 1(f)(a):

The evaluation criteria must be objective, relevant to the subject matter of the contract, and precisely specified in advance in the procurement documents, so that the award decision is made solely on the basis of the criteria stipulated in the documents.

Conclusion: No gap

Qualitative analysis

The PPDPAA and PPDPA Regulations require use of objective evaluation criteria relevant to the subject matter of the contract which must be prescribed in the bidding documents.

S.50 of the PPDPAA provides that bids that have not been rejected, meaning responsive bids, will be evaluated in order to provide an equal basis for comparing them. R. 30(3) of the PPDPA Regs provides that bids are substantially responsive when bidders fulfil eligibility conditions as prescribed in the bidding documents, the bids are administratively compliant, and they substantially comply with the terms and conditions set out in the bidding documents. R. 30(4) provides that if in evaluating a bid it is found that there is a minor deviation from the requirements in the bidding document and the bid which did not merit rejection or a finding of non-responsiveness, the cost of the deviation must be established and the evaluated cost of the bid will be compared to other bids in order to determine the lowest bid.

The procedure for calculating the price of bids in regulated in S.50(2) and is mandated to be objectively applied to all bids. This process of evaluation indicates that the evaluation criteria is objective, relevant, specifically set out in the bidding documents and bids are evaluated on the basis of the criteria.

Gap analysis

Recommendations

Assessment criterion 1(f)(b):

The use of price and non-price attributes and/or the consideration of life cycle cost as appropriate to ensure objective and value-for-money decisions.

Conclusion: No gap

Qualitative analysis

There are provisions in the legal framework for use of criteria in addition to price including reference to life-cycle costing.

S.50(3) of the PPDPAA states that in addition to price, a PE may evaluate bids according to criteria relating to safety, environmental and social benefits, cost-effectiveness based on life-cycle and costing, including costs related to acquisition, costs of such as consumption of energy and other resources, end of life costs such as environmental rehabilitation, collection and recycling costs and any other criteria that may be prescribed.
The assessment recognises that the legal framework meets the criterion. However, practical realities may result in the criterion not being fully achieved in practice.

See indicator 9 for the practical implication in the limited use of price and quality. See 3(a) for analysis, Gaps and Recommendations concerning use of sustainable public procurement embedded in the entire procurement cycle.

Gap analysis

Recommendations

Assessment criterion 1(f)(c):
Quality must be a major consideration in evaluating proposals for consulting services, and clear procedures and methodologies for assessment of technical capacity must be defined.

Conclusion: No gap

Qualitative analysis
Quality is a major consideration in evaluating proposals for consulting services. The PPDPAA includes clear procedures and methodologies for assessment of technical capacity under different methods of procurement.

Part VIII of the PPDPAA regulates the procurement of consulting services and provides in S.59 that when using the request for proposals method of procurement, whenever practicable and appropriate, bids should be evaluated by the quality and cost-based selection method. The weight given to quality will be based on the nature of the service sought.
When the service sought is of a highly technical nature, the quality-based selection method should be used. "The quality-based selection method entails a process whereby the procuring entity establishes the best technical offer regardless of cost, subject however to the procuring entity engaging in negotiations around the issue of cost to achieve value for money" in S.63 of the PPDPAA. For purposes of this part of the PPDPAA, "technical" means "a bid, or that part of a bid, which sets out the nature of the service to be provided under the bid and the manner in which it is to be provided."

Under the quality and cost-based selection method, a methodology for assessing technical capacity is provided in S.60(3). The section provides that in evaluating technical bids for this method, the PE must take into account the consultant's relevant experience for the assignment, the manner in which the service is proposed to be provided including any transfer of knowledge, the qualifications of the key personnel and such other criteria as may be prescribed. The bid will be marked according to each criterion on a scale of one to 100 and the marks will be weighted to become quality scores. Under the fixed budget method and least-cost selection method technical capacity is evaluated in the same way as under the cost-based selection method. For the selection amongst community service organisations method, "technical bids submitted shall be evaluated using criteria reflecting the unique qualifications of community service organisations, such as voluntarism, non-profit status, local knowledge, scale of operation, and reputation" in S.64.

Gap analysis

Recommendations

Assessment criterion 1(f)(d):
The way evaluation criteria are combined and their relative weight determined should be clearly defined in the procurement documents.

Conclusion: No gap

Qualitative analysis
S.60(a) of the PPDPAA provides that "the criteria to be used in evaluating technical bids, and the weight to be given to each criterion shall be set out in the request for proposals." In the standard bidding documents (SBDs) it is noted that the evaluation methodology should be one of the selection methods in the PPDPAA for which standard wording is provided in the SBD. A template evaluation methodology is also provided for technical proposals. This entails a point scoring system with a total of 100 points that can be earned.

Gap analysis

Recommendations

Assessment criterion 1(f)(e):
During the period of the evaluation, information on the examination, clarification and evaluation of bids/proposals must not be disclosed to participants or to others not officially involved in the evaluation process.

Conclusion: No gap

Qualitative analysis
S.55 of the PPDPAA provides that a PE shall take all necessary steps to ensure that information relating to (a) the content of pre-qualification applications and bids; or (b) the examination, clarification, evaluation and comparison of bids; is not disclosed to suppliers, contractors, service providers or consultants or to any other person not officially involved in the examination, evaluation, comparison or acceptance of bids.

Gap analysis

Recommendations

Sub-indicator 1(g)
Submission, receipt, and opening of tenders
The legal framework provides for the following provisions:

Assessment criterion 1(g)(a):
Opening of tenders follows a defined and regulated proceeding, immediately after the closing deadline for bid submission.

Conclusion: Medium risk gap

Qualitative analysis
The procedure for opening of tenders is regulated in the PPDPAA but the provisions have not been updated to reflect use in practice of the eGP system with automated tender opening.

The procedure for opening bids is regulated in S.46 of the PPDPAA and provides in subsection (1) that at the end of the bidding period, or as soon as possible thereafter, a PE shall, at the time and place specified in the bidding documents, open all the bids it has received. The procedure for opening bids, including the information to be announced and recorded is regulated in this section. In January 2026, the use of eGP is standard in the Zimbabwean public procurement regime. However, S.46 does not provide for or regulate the opening of e-tenders using eGP. S.46 is therefore not aligned with the new eGP system which results in a lack of clarity as to the extent of and persons who have access to information at the opening of e-tenders and reduces transparency of the eGP system. This in turn may result in the rejection of compliant bids or the acceptance of non-compliant bids.

Gap analysis
The regulatory framework does not mandate the opening of e-tenders using the eGP system. The absence of an enabling provision in this context creates uncertainty in determining the compliance of bid proposals, making the process of opening bids susceptible to legal challenge.

Recommendations
The legislative framework should be updated to mandate the opening of tenders on the eGP system to ensure transparency as to the information that will be released to bidders and the public and related time frames attached to the release of information including the names and addresses of the bidders; the date and condition the tender was received (to determine compliance with formal requirements); tender prices; any withdrawals or modifications to tenders duly submitted and any alternative offers requested or permitted including the name of the bidder and tender prices and security and confidentiality requirements. Ensuring that all necessary information is accessible, will reduce the risk of rejecting otherwise compliant bids.

*See general recommendation for enabling provisions in criterion 1(j)(a)***.**

Assessment criterion 1(g)(b):
Records of proceedings for bid openings are retained and available for review.

Conclusion: No gap

Qualitative analysis
S.69 of the PPDPAA regulates the records of procurement proceedings and provides that a PE "shall keep a separate record for each procurement, (the "procurement record") which shall be marked with a reference number for easy identification." R.39 of the PPDPA Regs provides that accounting officers shall maintain an individual file for each procurement requirement. The regulation specifically identifies the information to be maintained.

S.69(3) of the PPDPAA provides that the PE shall, on request made at any time after a bid has been accepted in the procurement proceedings concerned, permit any person to inspect the procurement record and to make copies of any documents in the record provided that— (i) this subsection shall not preclude earlier disclosure of the record, where such disclosure is required by law or by order of a court or an arbitrator and (ii) such disclosure shall be made in such a way as to preserve the confidentiality of proprietary commercial information. The records of proceedings for bid openings are therefore retained and available for review.

Gap analysis

Recommendations

Assessment criterion 1(g)(c):
Security and confidentiality of bids is maintained prior to bid opening and until after the award of contracts.

Conclusion: No gap

Qualitative analysis
The legal and regulatory framework in the PPDPAA and Cyber and Data Protection Act provide for security and confidentiality of bids until after award of contracts
In practice the findings from the sampling process indicates the possibility of compromised confidentiality and this is addressed at 9(b)(e).

As noted in criterion 1(g)(b) above, S.69(3) of the PPDPAA regulates the disclosure of information after a bid has been accepted unless otherwise justified. S.53 of the PPDPAA provides that a PE shall take all necessary steps to ensure that information relating to the content of pre-qualification applications and bids or the examination, clarification, evaluation and comparison of bids is not disclosed to suppliers, contractors, service providers or consultants or to any other person not officially involved in the examination, evaluation, comparison or acceptance of bids.

The security of bids is regulated by the Cyber and Data Protection Act Chapter 12:07.[13] The information contained in bids falls under the definition of data and "personal information" as defined in the Act.[14] The Act is applicable to the protection of privacy of information. To this end, s.11 of the Act provides for the protection of sensitive data which includes procurement data by regulating consent for transfer of information.

Further, s.94 of Statutory Instruction 144 of 2019 regulates confidentiality in procurement and provides that:

(1) The Head of the Procurement Management Unit (PMU) shall ensure that bidder debriefing is carried out in accordance with the provisions of Procurement policies and procedures and in a manner that is transparent, timely and non-discriminatory. It is the responsibility of the Head of PMU and officers involved in procurement to ensure that the debriefing does not disclose details of any other bids, other than information that is publicly available from bid openings or published notices, and
(4) The Head of PMU shall ensure that the duties relating to recording, preparation and disclosure of tender details are carried out in a manner that avoids exposure of proprietary commercial information.

Although the legal framework meets the criterion, practical realities may result in the criterion not being fully achieved in practice.
See also, analysis, Gap and Recommendations at 9(b)(e): Quantitative data from the sampling process indicates that confidentiality may be compromised.[15]

Gap analysis

Recommendations

Assessment criterion 1(g)(d):
The disclosure of specific sensitive information is prohibited.

Conclusion: No gap

Qualitative analysis
S. 69(3)(ii) provides for the disclosure of information in a way that preserves the confidentiality of proprietary commercial information. In addition, R.39(3) provides that PEs shall ensure that confidential and commercially sensitive information provided by bidders and included in the procurement record is not disclosed to other bidders or made public. S. 70(2)(e) prohibits procurement officials from revealing confidential information, including bidders' proprietary information.

Gap analysis

[13] The Act defines data as "any representation of facts, concepts, information, whether in text, audio, video, images, machines-readable code or instructions, in a form suitable for communications, interpretation or processing in a computer device, computer system, database, electronic communications network, or related devices and includes a computer programme and traffic data."
[14] The definition includes (a) the person's name, address, or telephone number; (b) the person's race, national or ethnic origin, (g) educational, financial, criminal or employment history.
[15] PRAZ Circular OPS/2 of 2025, dated 26 September 2025, notes ongoing concerns about continued practice of conducting procurement proceeding outside the eGP system, especially for RFQ and secondary bidding under Framework Agreements.

Recommendations

Assessment criterion 1(g)(e):
The modality of submitting tenders and receipt by the government is well defined, to avoid unnecessary rejection of tenders.

Conclusion: Medium risk gap

Qualitative analysis
S.43(2) of the PPDPAA provides that "bids and applications to pre-qualify may be submitted to the procuring entity by hand or by post or by courier, at the option of the bidder provided that, subject to any e-procurement policy laid down by the Authority, a procuring entity in its bidding documents may authorise other methods of submission of bids, such as by electronic mail, as long as the confidentiality and security of bids are assured." Although this section speaks to an e-procurement policy that may regulate the submission of tenders, no rules for the modality of submitting tenders on the eGP system have been created.

See general recommendation for enabling provisions in criterion 1(j)(a).

Gap analysis
The regulatory framework does not provide for the modality of submission and receipt of e-tenders using the eGP system, subjecting this gap in the regulatory framework to legal challenge by creating the risk of approving potentially non-compliant bids.

Recommendations
The modality of submitting tenders and receipt by the government of e-tenders using the eGP system should be well defined, to avoid unnecessary rejection of tenders. This provision should include reference to security requirements for e-tenders and timelines for submission of bids to ensure that compliant tenders are submitted.

Sub-indicator 1(h)
Right to challenge and appeal
The legal framework provides for the following:

Assessment criterion 1(h)(a):
Participants in procurement proceedings have the right to challenge decisions or actions taken by the procuring entity.

Conclusion: No gap

Qualitative analysis
Participant in procurement proceedings have the right to challenge decisions or actions, with the challenge being submitted to the procuring entity.
PRAZ also offers an informal complaints resolution process.

Terminology used to describe the right to challenge and appeal in MAPS methodology and that in the PPDPAA differ. For purposes of this criterion the "right to challenge" refers to a challenge submitted to a PE and an "appeal" refers to a request to the review panel and the review panel process.

Challenge submitted to PE: S.73(1) of the PPDPAA provides that "a potential or actual bidder in procurement proceedings who claims to have suffered, or to be likely to suffer, loss or injury due to a breach of a duty imposed on a procuring entity by or under this Act, may challenge the procurement proceedings by Lodging a written notice with the procuring entity in accordance with this section."

PRAZ Informal complaints resolution process: PRAZ will investigate complaints raised with it about the procurement system, including conduct of procurement processes, pursuant to PPDPAA S.7(c) (PRAZ compliance powers). Complaints may be anonymous or attributable, submitted by phone, email or walk-ins to PRAZ offices. They can be from PEs, bidders or the public. Where PRAZ assesses that the complaint relates to a compliance issue it will investigate and seek to resolve the complaint through this informal channel including liaising with the PE concerned. PRAZ has an internal Standard Operating Procedure (SOP) for handling of these types of complaints. The availability of this informal process is not publicised on PRAZ's website and there is no information for potential complainants about the process which will be followed.

Gap analysis

Recommendations

Suggestions for improvement

PRAZ Informal complaints resolution process: The lack of publicly available information about the informal complaints resolution process restricts the possibility of its use to those "in the know". There is a lack of transparency and clarity on both how the process is conducted and what are the potential outcomes, including when a complaint informally received will be resolved through the formal process found in legislation.

Information about the informal complaints resolution process should be publicised, including on PRAZ's website and on social media. Information published by PRAZ should raise general public awareness and ensure that all potential complainants (including bidders who may wish to use this process) clearly understand who may complain, how to make a complaint, how the complaint will be handled, timelines for resolution of a complaint, the nature of the resolution of the complaint in terms of its binding effectiveness and publication of information on resolution to ensure the process remains transparent.

It is also important to ensure that bidders understand whether and/or how these informal complaints resolution process has an impact on bidders' right to submit a formal challenge pursuant to S.73(1) of the PPDPAA. It should be made clear, for example, that the informal complaints resolution process offered by PRAZ is not part of the more formal scheme for challenge and review, that it is not necessary to pursue an informal complaint to PRAZ prior to submitting a challenge, and that an informal complaint does not remove or in any way impact a bidder's right to lodge a formal challenge, including the statutory timescales for submission of a challenge.

Assessment criterion 1(h)(b):
Provisions make it possible to respond to a challenge with administrative review by another body, independent of the procuring entity that has the authority to suspend the award decision and grant remedies, and also establish the right for judicial review.

Conclusion: No gap

Qualitative analysis
Bidders who have submitted a challenge to a procuring entity are entitled to make an application for review by an independent Review Panel established pursuant to provisions in the PPDPAA. An application for review automatically suspends the procurement proceedings. The Review Panel has authority to grant a range of remedies including annulment in whole or in part of any unauthorised act or decision. The PPDPAA also provides for appeal to the Administrative Court against a decision of the Review Panel.

Review by the Review Panel: S.74(1) of the PPDPAA provides that where (a) a PE has not conceded that it breached a duty as alleged in a challenge; or (b) the bidder that lodged the challenge is dissatisfied with any steps taken or to be taken in terms of S.73(5)(b) to rectify the breach alleged in a challenge; the bidder may within 5 days after lodging the challenge apply in writing to the PRAZ for the procurement proceedings concerned to be reviewed by a review panel. S.75 regulates the appointment of members of the review panel to ensure its independence. In applying for the review of procurement proceedings, PPDPA Regs R.56(5) provides that as soon as the PE has been notified of an application for review the PE shall suspend the procurement proceedings until the review panel has completed the review and given its decision. The review panel therefore has the right to review proceedings and grant remedies, but it is the responsibility of the PE to suspend an award decision under the regulations.

S.76(5) provides that the remedies the review panel can grant include (a) prohibiting the PE from making a decision or doing anything in an unauthorised manner or from following an incorrect procedure; (b) annul in whole or in part any unauthorised act or decision of the PE, other than an act or decision bringing the procurement contract into force; (c) order the PE to begin the procurement proceedings afresh or (d) awarded damages to the bidder for any loss suffered.

S.74(4) states that "the making of an application to the Authority within the five-day period specified in subsection (1), shall suspend the challenged procurement proceedings until—(a) the review panel determines the challenge; or (b) the review panel cancels the suspension in terms of **section 76**(7). Therefore, the suspension of procurement proceedings or an award decision is automatic upon application for review under the Act.

Judicial review - Appeal to the Administrative Court: S.77 of the PPDPAA provides for appeal to the Administrative Court against the decision of the review panel. The section provides that (1) a bidder or a procuring entity aggrieved by a decision of a review panel may appeal against the decision to the Administrative Court within twenty days after the panel's decision was notified to the party concerned and (2) in an appeal the Administrative Court shall not set aside the decision of the review panel but may award fair and adequate compensation to the appellant for any patrimonial loss or damage the appellant may have suffered. R.61 of the PPDPA Regs provides that an appeal to the Administrative Court or other courts shall only be valid if the challenge proceedings under the PPDPAA and its Regulations have been complied with. Remedies available to the PE for breach of contract are regulated in S.87 of the PPDPAA.

Gap analysis

Recommendations

Assessment criterion 1(h)(c):
Rules establish the matters that are subject to review.

Conclusion: No gap

Qualitative analysis
The PPDPAA sets out the matter that are subject to review, which are broadly drafted to provide meaningful access to legal redress.

S.73(1) of the PPDPAA provides that a potential or actual bidder in procurement proceedings who claims to have suffered, or to be likely to suffer, loss or injury due to a breach of a duty imposed on a procuring entity by or under this Act, may challenge the procurement proceedings. Part VIII of the PPDPA Regs regulates the challenge proceedings.

The matters subject to review are broadly drafted to provide for meaningful access to legal redress. If an aggrieved bidder does not seek compensation but rather reconsideration of the decision by the review panel, an appeal to a civil court can be made. The Administrative Justice Act Chapter 10:28 applies to such instances.[16] S.5 of the Act describes determining factors for determining whether an administrative authority has failed to comply with its duties set out in S.3 of the Act. These are the grounds on which administrative actions relating to procurement decisions made by PEs as administrative authorities can be reviewed.

Gap analysis

Recommendations

[16] Administrative action regulated by the Act is defined as any action taken or decision made by an administrative authority which in turn includes a local authority or parastatal (used interchangeably with the term SOE).

Assessment criterion 1(h)(d): Rules establish time frames for the submission of challenges and appeals and for issuance of decisions by the institution in charge of the review and the independent appeals body.
Conclusion: No gap
Qualitative analysis The PPDAA establishes time frames for the submission of challenges and appeal and for issuance of decisions by the institution in charge of the review (PE) and the independent appeals body (review panel). **Review by PE** **Challenge submission:** S.73 of the PPDPAA makes a distinction between challenges where the notice of award has been issued and where it has not yet been issued. In the latter instance, a challenge may be lodged at any stage of the procurement proceedings up to the date on which such notice is issued in terms of S.73(2). Where the challenge relates to alleged improprieties in the bid invitation or pre-qualification of bidders, that became apparent before bids were opened, must be lodged prior to bid opening. In the case of a challenge where a notice of award has been issued, a challenge may be lodged only within the 14-day period referred to in S.55(2)[17] or 60(14).[18] **Challenge decision:** S.73(5) provides that if the procuring entity concedes that it breached a duty as alleged in the challenge, it shall within five days (a) notify the bidder concerned and the Authority of its concession; and (b) take whatever steps it considers necessary, or as the PRAZ may direct, to rectify the breach. **Review by Review Panel** **Appeal submission:** S.74(1) of the PPDPAA regulates the time frame for appeals and provides that where either a procuring entity has not conceded that it breached a duty as alleged in a challenge or the bidder that lodged the challenge is dissatisfied with any steps taken or to be taken in terms of S.73(5)(b) to rectify the breach alleged in a challenge, the bidder may within five days after lodging the challenge apply in writing to the PRAZ for the procurement proceedings concerned to be reviewed by a review panel. **Appeal decision:** S.76(1) provides that “a review panel appointed to hear a challenge shall conduct such investigation and hearing as it considers appropriate and deliver its written decision in the matter, setting out its reasons for the decision, within fourteen days after the application for review of the procurement proceedings concerned was received by PRAZ.”
Gap analysis
Recommendations
Assessment criterion 1(h)(e):

[17] S.55(2) provides that “before the expiry of the period of bid validity, the procuring entity shall notify (a) the successful bidder of the proposed award and of the time within which the contract must be signed, subject to any intervening challenge filed in accordance with Part X; and (b) the other bidders of the name and address of the proposed successful bidder and the price of the contract; and the contract shall not be signed until at least fourteen days have passed following the giving of that notice.”

[18] S.60(14) provides that “after negotiations in terms of subsection (12) or, as the case may be, subsection (13) have been successfully completed, the procuring entity shall promptly notify other firms on the short-list that they were unsuccessful, and shall not sign a procurement contract with the successful firm until at least fourteen days have elapsed following the giving of that notice.”

Applications for appeal and decisions are published in easily accessible places and within specified time frames, in line with legislation protecting sensitive information.
Conclusion: Low risk gap
Qualitative analysis To ensure transparency and access to information, appeals and decisions should be public by law and posted in easily accessible places on a central online platform such as the PRAZ website within specified timelines. However, appeals and decisions are not published on the PRAZ website or other easily accessible places.
Gap analysis The regulatory framework does not mandate that appeals and decisions be published and publicly available. Appeals and decisions are not published on the PRAZ website or another easily accessible place, resulting in reduced transparency and access to information, which may undermine trust and confidence in the process. Specified time frames in which appeals and decisions are published are similarly unregulated.
Recommendations The regulatory framework should mandate that appeals and decisions be published online at an easily accessible location, for example on the PRAZ website, within a time frame specified in legislation to ensure full transparency to allow interested parties to be better informed as to the consistency and fairness of the process.
Assessment criterion 1(h)(f): Decisions by the independent appeals body can be subject to higher-level review (judicial review).
Conclusion: No gap
Qualitative analysis As noted under criterion 1(h)(b), an appeal of the decision by the review panel can be made to the Administrative Court or another court. However, the decision of the review panel cannot be set aside, but the appeal court may award fair and adequate compensation for any patrimonial loss or damage suffered in S.77 of the PPDPAA. Judicial review of an administrative act under the Administrative Justice Act [Chapter 10:28] would be possible where an administrative authority as defined falls short of its duties set out in S.3 of the Administrative Justice Act. A review of a decision by a civil court is therefore a possible avenue for high-level review.
Gap analysis
Recommendations
Sub-indicator 1(i) **Contract management** **The legal framework provides for the following:**
Assessment criterion 1(i)(a): **Functions for undertaking contract management are defined and responsibilities are clearly assigned.**
Conclusion: No gap
Qualitative analysis The PPDPAA and PPDPA Regs clearly assign defined responsibilities for contract management to procuring entities who are required to report to PRAZ on the performance, management and completion of their procurement contracts. S.79 of the PPDPAA provides that "a procuring entity shall be responsible for administering its procurement contracts and shall establish procedures for doing so and provide the necessary resources, human and material, for

effective contract administration." R.64 provides that PEs shall report to the PRAZ on the performance, management and completion of their procurement contracts. The time limits and frequency with which such reports should be submitted will be regulated by circular.

Gap analysis

Recommendations

Suggestions for improvement
Publish a circular setting out the time limits and frequency with which reports should be submitted by PEs to PRAZ to ensure compliance with R.64.

Assessment criterion 1(i)(b):
Conditions for contract amendments are defined, ensure economy and do not arbitrarily limit competition.

Conclusion: No gap

Qualitative analysis
Conditions for contract amendments are provided in the PPDPAA and PPDPA Regulations and the Code of Conduct for Procurement Officers requires officers to manage procurement contracts in accordance with the terms of conditions of contract.

In the Code of Conduct for Procurement Officers found in the PPDPA Regs, R.14 provides that officers must ensure that they manage procurement contracts in accordance with terms and conditions specified in the bidding documents and that all decisions on the contracts are exclusively in line with the terms and conditions of the contract.

S.81 of the PPDPAA Provides that "any variation of a procurement contract that exceeds the maximum variations allowed in the contract documents or necessitated by any law enacted after the award shall be effected by a modification of the contract signed by both parties. The parties to a procurement contract shall not agree to vary the contract if the variation would result in a contract materially different from the original contract or would significantly alter the nature or scope of the contract. Where a procuring entity wishes to vary a procurement contract, (a) in a manner referred to in subsection (2); or (b) so as to increase the contract price to a greater extent than is prescribed or permitted by **section 80** ("Approaches to pricing in procurement contract"). The procuring entity shall either initiate fresh procurement proceedings or, where appropriate, embark on direct procurement in terms of **section 33**."

This provision makes a distinction between an amendment and a modification of contracts based on the extent to which the contract can be amended as provided in the contract documents and provides guidelines for variation in R.62. They ensure economy in that any price increase above that permitted by the act is prohibited. This provision provides in S.80(2) that "no adjustment of the price of the procurement requirement shall be permitted unless it is provided for in the procurement contract provided that in permitting such adjustment there must be no material deviation from the procurement requirements and the evaluation of the bid on the basis of which the contract was awarded."

See also, analysis at Indicator 9(c)(d) on contract amendments in practice.

Gap analysis

Recommendations

Assessment criterion 1(i)(c):

There are efficient and fair processes to resolve disputes promptly during the performance of the contract.

Conclusion: Medium risk gap

Qualitative analysis

The PPDPA requires PEs to ensure that every procurement contract entered into contains provisions for dispute settlement, but not all of the General Conditions of Contract issued by PRAZ contain a dispute settlement clause.

S.78 of the PPDPAA provides that the PE must ensure that every procurement contract entered into contains provisions for dispute settlement. Therefore, disputes are resolved in terms of the applicable contract provisions. The GCC for non-consulting services contains a clause for settlement of disputes, however, the GCC for non-complex works does not.

Gap analysis

The GCC for non-complex works does not provide for a dispute settlement clause which may result in a lengthy and costly dispute resolution process. It creates uncertainty as to the forum and manner in which a dispute pursuant to this GCC may be resolved which in turn directly affects value for money in the procurement process.

Recommendations

To avoid a delay in resolving disputes and completion of the contract, the GCC for non-complex works should contain a clause regulating the settlement of disputes to ensure speedy resolution and adequate access to redress for contractual parties.

See also, analysis, Gaps and Recommendations on standard contract conditions at 2(c).

Assessment criterion 1(i)(d):

The final outcome of a dispute resolution process is enforceable.

Conclusion: No gap

Qualitative analysis

The Arbitration Act Chapter 7:15 allows for arbitration of disputes and enforcement of awards. Court decisions are enforceable. Zimbabwe acceded to the New York Convention in 1994 which is given effect through the Arbitration Act.

Gap analysis

Recommendations

Sub-indicator 1(j)
Electronic Procurement (e-Procurement)
The legal framework provides for the following:

Assessment criterion 1(j)(a):

The legal framework allows or mandates e-Procurement solutions covering the public procurement cycle, whether entirely or partially.

Conclusion: High risk gap

Qualitative analysis

PPDPAA allow for use of eProcurement in general terms, but the legal framework needs to be updated to include provisions specifically enabling the implementation and use of eGP including mandating use at specific stages in the procurement process.

E-procurement is defined in S.2 of the PPDPAA as "a means the procurement of goods, construction works or services through Internet-based information technology." S.43 makes reference to an e-procurement policy created by the PRAZ which has been done in an e-government procurement (eGP) manual. The scope of the eGP system is from registration to contract management, although not all of the eGP system modules are being used by procuring entities in December 2025.

Although the PPDPAA provides for the use of e-procurement, the regulatory framework (PPDPAA or PPDPA Regulations) does not include an updated provision enabling the implementation and use of eGP to provide the legal authority for the use of the system at a sufficiently high level in the legal hierarchy. To date, PRAZ has issued Circulars[19] to issue directions to Accounting Officers to use the eGP system (pursuant to powers under PPDPAA S.7(a)), with particular focus on use of the eGP system by PEs to apply for authorisation to conduct procurement with submission of Annual Procurement Plans for approval by PRAZ.

A provision to enable the implementation and use of eGP can take the form of a general provision that mandates specific powers to implement specific actions in order to avoid delays in creating and implanting rules which may ordinarily be delayed in a longer, more formal legislative process. This applies to all criteria where eGP is used to ensure a clear legal basis for actions taken.

See also, indicator 7 for analysis on eGP in practice.

Gap analysis
In the absence of a provision specifically enabling the use of the eGP system, clear legal authority is compromised, subjecting actions under the eGP system to legal challenge.

Recommendations

1. It is recommended that a general enabling provision for the use of eGP is enacted to provide for the legal authority to use the system in primary legislation. In addition, a mandate for PEs to use eGP as it is phased in should be enacted that will provide legal authority to do so.
2. To address the need for specific rules as eGP is rolled out over time, an agile system that allows for further rules to be enacted pursuant to a general enabling provision, without undue delay between enactment and implementation should be maintained. This is to avoid a gap between the rules and practice when an aspect of the eGP may be in use but operates in the absence of an enabling provision. In practice, it may be more efficient to enact an enabling provision in primary *or* secondary legislation, with implementation rules contained in legally binding instructions as permitted in S.6(1)(c) of the PPDPAA to ensure speedy implementation of all eGP related actions.
3. Transitional rules could be enacted in circulars while eGP is rolled out in stages and paper-based aspects of the procurement process may still be used. Clarification of a parallel system should be provided to ensure legal certainty in and fair access to the applicable rules. This enabling provision should be reviewed regularly to ensure that it remains fit for purpose.

Assessment criterion 1(j)(b):
The legal framework ensures the use of tools and standards that provide unrestricted and full access to the system, taking into consideration privacy, security of data and authentication.

Conclusion: No gap

Qualitative analysis

[19] eGP circulars issued by PRAZ: OPS/5 of 2023, Introduction of eGP; OPS/1 of 2024, eGP adoption; OPS 4/2024, application for authorisation; OPS 2/2025, eGP utilisation

Tools and standards for use of the eGP system has been published by PRAZ in the eGP supplier manual and is available on the PRAZ website.[20] Privacy and security of data and authentication are regulated by the Cyber and Data Protection Act.

Gap analysis

Recommendations

Assessment criterion 1(j)(c):
The legal framework requires that interested parties be informed which parts of the processes will be managed electronically.

Conclusion: No gap

Qualitative analysis
The eGP manual for e-bid submission for suppliers published by the PRAZ indicates that the submission of bids will be electronic. As the entire eGP process is implemented in practice, manuals with further instructions as to which parts of the process will be managed electronically should be published.

Gap analysis

Recommendations

Suggestions for improvement
As the entire eGP process is implemented in practice, guidelines or manuals with further instructions as to which parts of the process will be managed electronically should be published.

Sub-indicator 1(k)
Norms for safekeeping of records, documents and electronic data
The legal framework provides for the following:

Assessment criterion 1(k)(a):
A comprehensive list is established of the procurement records and documents related to transactions including contract management. This should be kept at the operational level. It should outline what is available for public inspection including conditions for access.

Conclusion: No gap

Qualitative analysis
S.69 of the PPDPAA regulates records of procurement proceedings. It provides that records for each procurement should be kept and provides a list of minimum information that it should include. Records should be kept at PE level and outlines what is available for public access. S.69.6 provides that PRAZ must establish an electronic system for the purpose of this section and specify the conditions under which access to electronic data in the system is open.

The assessment recognises that the legal framework meets this criterion.
See analysis, Gap and Recommendations at 9(g)(c) concerning the need for improved record keeping in practice.

Gap analysis

Recommendations

Assessment criterion 1(k)(b):

[20] https://www.praz.org.zw/egp/.

There is a document retention policy that is both compatible with the statute of limitations in the country for investigating and prosecuting cases of fraud and corruption and compatible with the audit cycles.
Conclusion: No gap
Qualitative analysis S.69(4) provides that PEs must preserve procurement records for at least six (6) years following completion or termination of a procurement contract or cancellation of the procurement proceedings. The Prescription Act Chapter 8:11 does not regulate prescription period for fraud and corruption, neither does the Criminal Law (Codification and Reform) Act Chapter 9:23.
Gap analysis
Recommendations
Assessment criterion 1(k)(c): There are established security protocols to protect records (physical and/or electronic).
Conclusion: Medium risk gap
Qualitative analysis There are no established security protocols to protect physical public procurement records. The Cyber and Data Protection Act provides for the security of electronic records. During discussions between the MAPS Assessment team and PRAZ Legal team during December 2025, it was confirmed that established security protocols are within the discretion of the PEs and although not formally monitored by PRAZ, are a natural consequence of the obligation to report to PRAZ.
Gap analysis Security protocols for protection of records: There are no established security protocols to protect physical public procurement records thus jeopardising the ability to check implementation performance due to lack of availability of relevant records.
Recommendations Security protocols for protection of records: Establish security protocols to protect physical records of public procurement, and consider measures, including enforcement, to ensure compliance in a consistent manner by all procuring entities. This will need to be closely aligned with new provisions to be introduced to ensure appropriate alignment with operation of the eGP system.
Sub-indicator 1(l) **Public procurement principles in specialized legislation** **The legal and regulatory body of norms complies with the following conditions:**
Assessment criterion 1(l)(a): Public procurement principles and/or the legal framework apply in any specialised legislation that governs procurement by entities operating in specific sectors, as appropriate.
Conclusion: No gap
Qualitative analysis There is no specialised legislation governing procurement by entities operating in specific sectors.
Gap analysis
Recommendations

Assessment criterion 1(l)(b):
Public procurement principles and/or laws apply to the selection and contracting of public private partnerships (PPP), including concessions as appropriate.

Conclusion: No gap

Qualitative analysis
As noted under criterion 1(a)(c), PPPs are primarily regulated by the ZIDA Act and in certain cases the PPDPAA as directed in S.3(3) of the Fourth Schedule to the ZIDA Act. The section provides that where a PPP project has been approved but no satisfactory counterparty has been identified, the contracting authority must be directed to conduct a procurement process to appoint a counterparty in line with the PPDPAA. Where two or more counterparties have been identified, one must be selected or the contracting authority must be directed to receive tenders from the proposed counterparties in line with the PPDPAA. Public procurement principles are applicable to PPPs to the extent that the Cabinet with recommendation of a committee directs that a procurement process be conducted in a particular PPP project. S.3(1) provides that where a project has been identified, expressions of interest must be publicly advertised. However, this may be dispensed with where a counterparty has already been identified and disclosed to the PPP Unit.

Gap analysis

Recommendations

Assessment criterion 1(l)(c):
Responsibilities for developing policies and supporting the implementation of PPPs, including concessions, are clearly assigned.

Conclusion: No gap

Qualitative analysis
S.3 of the ZIDA Act establishes the Zimbabwe Investment Development Agency (ZIDA) and in S.34 provides that the Public-Private Partnership Unit (PPPU) of ZIDA is responsible for policy making in regulating PPPs. The section also provides that the PPPU is responsible for monitoring and evaluation of PPPs, advising the government on PPPs and examine requests for project proposals among other aspects. PPP guidelines prepared by ZIDA are currently awaiting cabinet approval.[21]

Gap analysis

Recommendations

Indicator 2. Implementing regulations and tools support the legal framework

Sub-indicator 2(a)
Implementing regulations to define processes and procedures

Assessment criterion 2(a)(a):
There are regulations that supplement and detail the provisions of the procurement law, and do not contradict the law.

Conclusion: No gap

Qualitative analysis
The PPDPA Regulations are published pursuant to S.101 of the PPDPAA. The PPDPA Regulations supplement and detail the provisions of the PPDPAA and do not contradict the law. Further subordinate regulations include

[21] This information was obtained during discussions between MAPS Assessment Team and ZIDA in November 2025.

instructions and circulars (including directives) that further provide operational detail for implementing the PPDPAA.

See 2(a)(c) for Gap and Recommendations to update PPDPA Regulations to better align with use of eGP in practice.

Gap analysis

Recommendations

Assessment criterion 2(a)(b):
The regulations are clear, comprehensive and consolidated as a set of regulations readily available in a single accessible place.

Conclusion: Low risk gap

Qualitative analysis
The PPDPAA Regulations are comprehensive and consolidated.
The PPDPAA can be found on the PRAZ website, however, the PPDPA Regulations are not readily available on the PRAZ website or eGP portal.

Gap analysis
Clear, comprehensive and consolidated PPDPA Regulations are not readily available online in a single accessible place, to ensure transparency and fair participation in the procurement process.

Recommendations
Upload consolidated PPDPA Regulations and make them available online in a single accessible location, for example on the PRAZ website alongside the PPDPAA or eGP website if a decision is made to locate all legal and regulatory documents at that location.

See also, analysis, Gap and Recommendations at 1(a)(d) public availability of all legal/regulatory framework documents online (including circulars) and on eGP and availability of relevant documents.

Assessment criterion 2(a)(c):
Responsibility for maintenance of the regulations is clearly established, and the regulations are updated regularly

Conclusion: Medium risk gap

Qualitative analysis
S.101 of the PPDPAA assigns responsibility for the PPDPA Regulations to the Minister of Finance after consultation with the PRAZ. PPDPA Regulations should be updated to reflect the use of the eGP system. The MAPS Assessment team understands that in January 2026, proposals for amendments to the Regulations are being drafted. [22]

Gap analysis
Regulations should be updated regularly to ensure transparency, access to information and fair participation in the procurement process. Regulations are currently not updated to reflect the use of eGP in practice, making any action taken in absence of an enabling provision susceptible to legal challenge.

See also, analysis, Gap and Recommendations at 1(j)(a) on legislative updates to align with eGP.

[22] Based on discussions with between the MAPS Assessment Team and the PRAZ legal team in December 2025, the Regulations were last reviewed in 2022 and efforts toward amendment of the Regulations are currently ongoing.

Recommendations
Regulations to the PPDPAA should be updated to reflect the use of the eGP system and references to e-procurement should be replaced with eGP to ensure a legally certain, transparent and fair regulatory framework.

Sub-indicator 2(b)
Model procurement documents for goods, works and services

Assessment criterion 2(b)(a):
There are model procurement documents provided for use for a wide range of goods, works and services, including consulting services procured by public entities.

Conclusion: No gap

Qualitative analysis
Standard bidding documents (SBDs) are used for goods, works, services and non-consulting services that are applicable to all PEs. S.41 of the PPDPAA provides that "for the purposes of any procurement, a procuring entity shall use the prescribed standard bidding documents, including any manuals or guidelines pertaining thereto that may be issued by the Authority."

SBDs are published on PRAZ's website and can be downloaded in Word format. There are a number of different SBDS according to the subject matter of the procurement and procurement method.[23] SBDs include reference to applicable General Contract Conditions and Special Contract Conditions.

Gap analysis

Recommendations

Assessment criterion 2(b)(b):
At a minimum, there is a standard and mandatory set of clauses or templates that reflect the legal framework. These clauses can be used in documents prepared for competitive tendering/bidding.

Conclusion: No gap

Qualitative analysis
As noted at 2(b)(a) procuring entities are required to use SBDs issued by PRAZ. The minimum content of bidding documents is regulated in R.20 of PPDPA Regs.

Gap analysis

Recommendations

Assessment criterion 2(b)(c):
The documents are kept up to date, with responsibility for preparation and updating clearly assigned.

Conclusion: Low risk gap

Qualitative analysis
S.6(1)(d) provides that one of the functions of the PRAZ is to prepare standard documents and templates to be used for procurement and to enable PEs to maintain records and prepare reports. Although there is no express reference made to updating of the documents, this can be inferred from the responsibility for preparing documents assigned to the PRAZ. However, the SBD for large works references repealed legislation and as such is not up to date.

Gap analysis

[23] https://www.praz.org.zw/downloads/ accessed 22 February 2026.

SBD for large works is not updated with references to newer legislation. This creates an unfair playing field for bidders who contract using outdated SBDs, thereby reducing competition and confidence in the procurement system.

Recommendations
To ensure a level playing field and standardisation in all SBDs, the SBD for large works should be updated with references to new legislation to reflect the new Act and its Regulations to promote competition and increase confidence in the procurement system. All SBDs should be reviewed and updated as necessary to reflect legislative changes and to ensure that they are fit for purpose in the light of changing bidding practices including, for example, use of eGP for conduct of procurement processes and use of AI in the preparation of bids.

Sub-indicator 2(c)
Standard contract conditions used

Assessment criterion 2(c)(a):
There are standard contract conditions for the most common types of contracts, and their use is mandatory.

Conclusion: Medium risk gap

Qualitative analysis
General Contract Conditions (GCCs) for goods, works and services are published on the PRAZ website and serve as the standard contract conditions for most types of contracts. Procuring entities can use Special Contract Conditions to tailor the contractual package to their requirements. SBDs include reference to applicable General Contract Conditions and Special Contract Conditions.

S.78(1) PPDPAA provides that "where possible", a procurement contract must be based on the appropriate model contract set out or referred to in standard bidding documents developed by PRAZ. Therefore, the use of GCCs is not mandatory in all cases.

Gap analysis
The use of standard contract conditions is not mandatory in all cases and should be used where possible according to the PPDPAA. Contract conditions influence pricing and provide for risk allocation, thereby impacting value for money. The lack of use of standard contract conditions in all cases reduces certainty for bidders and may negatively impact the risk allocation in contracts. Unless specifically justified and clear reasons provided for deviation, standard contract conditions should be mandatory in all cases.

Recommendations
Use of the standard conditions of contract should be mandated in the legal framework with the possibility of exceptions in rare, clearly justified circumstances.

Suggestions for improvement:
1. Mandate the use of standard conditions of contract published by PRAZ or confirmed for use by PRAZ (in the case of international contracts or standards).
2. Based on the increased use of specialised procurement such as health goods and services and ICT systems, a standard form of contract for specialised procurement should be created. The same applies to internationally accepted standard contract conditions for construction works.
3. In the case of small procurements, short form contract standard conditions for low value, low risk contracts may be useful to enable a more efficient procurement process. The use of short form contracts should be underpinned by a requirement to document reasons for the use of the contract type other than one of the standard GCCs.
4. As additional GCCs for specialised procurement are created, the use of these and short form contracts should be supported by guidelines and training on the content and coverage as well as the appropriate choice of contract. This is to ensure use of the correct form of contract to avoid amendments and the absence of critical

contract provisions which may lead to legal challenge in contracts where the contract type does not adequately provide for the goods, works or services being procured.

Assessment criterion 2(c)(b):
The content of the standard contract conditions is generally consistent with internationally accepted practice.

Conclusion: No gap

Qualitative analysis
The content of the standard contract conditions is generally consistent with internationally accepted practice. The standard contract conditions contain all necessary provisions in line with internationally accepted practice, such as clear rights and obligations for both parties, clear dispute handling mechanism (except in the case of non-complex works as noted above) and applicable laws.

Gap analysis

Recommendations

Assessment criterion 2(c)(c):
Standard contract conditions are an integral part of the procurement documents and made available to participants in procurement proceedings.

Conclusion: No gap

Qualitative analysis
R.20(1)(o) provides that the bidding documents should include at a minimum the terms and conditions of the procurement contract. These are found in the GCC and special conditions of contract (SCC) as applicable.

Gap analysis

Recommendations

Sub-indicator 2(d)
User's guide or manual for procuring entities

Assessment criterion 2(d)(a):
There is (a) comprehensive procurement manual(s) detailing all procedures for the correct implementation of procurement regulations and laws.

Conclusion: No gap

Qualitative analysis
A manual is provided in the PRAZ Public Procurement Guidelines issued on 29 May 2019. The manual provides largely diagrammatic representations of procurement procedures and step-by-step instructions for each stage of the procurement process. Substantive rules are found in the Regulations to the PPDPAA and instruction notes where applicable.

Gap analysis

Recommendations

Assessment criterion 2(d)(b):
Responsibility for maintenance of the manual is clearly established, and the manual is updated regularly.

Conclusion: No gap

Pillar I. Legal, Regulatory, and Policy Framework

Qualitative analysis S.6(1)(c) of the PPDPAA provides that one of the functions of the PRAZ is to issue technical guidelines and instructions regarding the interpretation and implementation of this Act. The procurement manual constitutes a technical guideline and as such falls within the purview of S.6(1)(c), therefore, the responsibility of the manual lies with the PRAZ. During discussions with the PRAZ legal team, the MAPS Assessment team was informed by PRAZ that the manual is under review in December 2025.
Gap analysis
Recommendations
Suggestions for improvement Fully align terminology used in the manual to that used in the legislation. Updating terminology in the manual and legislation is further necessary to reflect the use of eGP.

Indicator 3. The legal and policy frameworks support the sustainable development of the country and the implementation of international obligations

Sub-indicator 3(a) **Sustainable Public Procurement (SPP)**
Assessment criterion 3(a)(a): The country has a policy/strategy in place to implement SPP in support of broader national policy objectives
Conclusion: High risk gap + red flag
Qualitative analysis Combined analysis for 3(a)(a) & (b) Zimbabwe adopted 11 of the 17 United Nations Sustainable Development Goals[24] (SDGs) in 2016. Progress has been made in some of the goals and significant work is needed in others.[25] Zimbabwe's second five-year plan, National Development Strategy 2 2026-2030[26] (NDS 2) focusses on ten national priority areas aligned with regional, continental and global frameworks including SDGs ensuring that Zimbabwe's development agenda contributes to the attainment of its international commitments under the 2030 Agenda for Sustainable Development. As of December 2025, a consultative process to create guidelines for sustainable procurement to be implemented at PE level is underway. The MAPS Assessment team understands that in this process public engagements have been held and feedback from the engagement will inform a sustainable procurement policy/strategy in future. However, a broader national policy regulating sustainable procurement is absent. Concurrent with the sustainable procurement guideline, an affirmative procurement guideline is being drafted and is targeted at including marginalised groups in Zimbabwean public procurement.
Gap analysis

[24] NDS 2 Table 1 shows alignment of NDS 2 National priorities to Regional Indicative Strategic Development Plan 202-2030, the African Union Agenda 2063 and the United Nations Sustainable Development Goals (SDGs) 2015-2030. NDS 2 integrates the Six Transitions identified by the UN as critical accelerators for achievement of SDGs by 2030.

[25] See Zimbabwe UN Sustainable Development Cooperation Framework 2022-2026 https://zimbabwe.un.org/sites/default/files/2021-10/2022-2026%20ZUNSDCF_Final.pdf that notes some progress in the areas of gender equality, great environmental stability and food systems, some economic growth and more accountable institutions and systems of law.

[26] NDS 2: Republic of Zimbabwe, National Development Strategy 2, January 2026 – December 2030, 27 November 2025.

Sustainable Public Procurement policy/strategy: There is no policy/strategy in place to implement sustainable public procurement (SPP). Lack of SPP policy/strategy hinders promotion and delivery of sustainable public procurement practices consistent with the principles of economy, efficiency and transparency and aligned with national goals.
► This Gap is assigned a Red flag because preparation and agreement on an SPP policy/strategy and implementation plan applying to all procuring entities and aligning with broader national policy objectives will require input from a number of institutions and ministries, with high level government support, and is not solely within the procurement sphere.

Recommendations
Combined recommendations for 3(a)(a), (b) & (c)
Sustainable Public Procurement policy/strategy and implementation, including incorporation of sustainability criteria into all stages of the procurement lifecycle: Develop a national sustainable public procurement policy/strategy to implement SPP (economic, environmental (including climate considerations) and social (including gender equality)) in support of broader national policy objectives and reflecting national priorities as set out in NDS2. This should include a clear implementation plan/road map to cover introduction of systems and tools to operationalise, facilitate and monitor the application of SPP in priority areas in particular. It should also identify and provide for any amendments necessary to the legal/regulatory framework to allow for sustainability to be fully incorporated at all stages of the procurement cycle ensuring well-balance application of sustainability criteria from planning through to contract delivery and monitoring. SPP requirements embedded in the legal and regulatory framework should be reflected in model procurement documents (standard tender documents), contract conditions and in supporting practical guidelines for implementation and related training.

Assessment criterion 3(a)(b):
The SPP implementation plan is based on an in-depth assessment; systems and tools are in place to operationalise, facilitate and monitor the application of SPP.

Conclusion: High risk gap + red flag

Qualitative analysis
See analysis at 3(a)(a).

Gap analysis
There is no SPP policy/strategy and thus no implementation plan. This Gap is assigned a Red flag as in 3(a)(a).

Recommendations
See recommendation at 3(a)(a).

Assessment criterion 3(a)(c):
The legal and regulatory frameworks allow for sustainability (i.e. economic, environmental and social criteria) to be incorporated at all stages of the procurement cycle.

Conclusion: High risk gap

Qualitative analysis
S.4(1)(e) of the PPDPAA provides that one of the objectives of the Act is "to secure the implementation of any environmental, social, economic and other policy that is authorised or required by any law to be taken into account by a procuring entity in procurement proceedings." S.6(1)(j) of the PPDPAA provides that it is a function of the PRAZ "to develop and advise the Government on ways in which the environmental, social and economic policies of Zimbabwe, including those designed for economic empowerment and domestic preferences, may be implemented through public procurement". S.50 in turn provides that in the evaluation of bids, in addition to price, criteria related to safety, environmental and social benefits may be evaluated. Sustainability can be applied in bid invitations and evaluations as explained under criterion 3(a)(d) below.

Gap analysis
Although the above provisions allow for sustainability to be incorporated throughout the procurement cycle, no implementation rules for these provisions have been created, resulting in a lack of sustainability being implemented in the public procurement process.

Recommendations
See recommendation at 3(a)(a).

Assessment criterion 3(a)(d):
The legal provisions require a well-balanced application of sustainability criteria to ensure value for money.

Conclusion: No gap

Qualitative analysis
Sustainability in bid invitations: S.25(1) of the PPDPAA provides that "a procuring entity may divide a procurement requirement, which could be procured in a single contract, into a package consisting of several lots which are to be bid together, where it is anticipated that the award of several separate contracts may result in the best overall value for the procuring entity or meet any environmental, social and economic objectives referred to in section 4(1)(e)."

Sustainability in bid evaluation: S.50(3)(h) provides that in evaluating additional criteria to price, costing including end of life costs such as environmental rehabilitation, collection and recycling costs may be considered.

R.82(iv) provides for environmental standards to be considered in a request for proposals and the weight that will be attached to it. R.85 in turn then provides that when evaluating a proposal, a contracting authority may take into account the "social and economic development potential offered by the proposal".
R.4 provides that "procurement officers must not engage contractors that are known…to be operating against the principles of sustainable (green) procurement".
These provisions provide for a well-balanced application of sustainability criteria throughout the procurement process to ensure value for money. The assessment recognises that the legal framework meets the criterion.

See also, analysis, Gap and Recommendations at 9(a)(c) where the sampled procurement files did not show evidence of use of sustainability criteria in practice

Gap analysis

Recommendations

Sub-indicator 3(b)
Obligations deriving from international agreements
Public procurement-related obligations deriving from binding international trade agreements are:

Assessment criterion 3(b)(a):
Consistently adopted in the legislative and regulatory framework.

Conclusion: High risk gap

Qualitative analysis

S.3(2) of the PPDPAA provides that to the extent that the Act conflicts with an obligation arising out of any convention, treaty or agreement, the convention, treaty or agreement shall prevail. However, no further reference is made to incorporation of obligations arising from international agreements into the Zimbabwean procurement legal/regulatory framework.[27]

[27] An international treaty does not become part of domestic law in Zimbabwe unless incorporated by an Act of Parliament, although the Constitution provides for exceptions allowing the Executive to enter into binding international agreements (s.327 of

Regional

Zimbabwe is a member of COMESA (Common Market for Eastern and Southern Africa). COMESA has specific set of Regulations concerning harmonisation of public procurement, issued pursuant to the COMESA Treaty. The COMESA Public Procurement Regulations,[28] which apply to all regional competitive bidding otherwise than provided under those Regulations.

Zimbabwe is an active member of the Southern Africa Development Community (SADC) and signatory to the SADC Protocol on Trade. In 2020, Zimbabwe became a member of the African Continental Free Trade Area (AfCFTA).

Multilateral

World Trade Organization (WTO): Zimbabwe is a member of the World Trade Organization. It is not a signatory to or observer of the WTO Agreement on Government Procurement (GPA). Zimbabwe is also a party to the Interim Economic Partnership Agreement (iEPA) with the EU. [29]

Bilateral

Zimbabwe has a number of bilateral trade agreements with Botswana, South Africa, Malawi, Mozambique and Namibia

For information:

Zimbabwe is a signatory to/has ratified the following UN conventions/covenants:[30] International Covenant on Civil and Political Rights, Convention on the Elimination of All Forms of Discrimination against Women, International Convention on Elimination of All Forms of Racial Discrimination, International Covenant on Economic, Social and Cultural Rights, Convention on the Protection of the Rights of all Migrant Workers and Members of Their Families, Convention on the Rights of the Child (and optional protocols), Convention on the Rights of Persons with Disabilities. Zimbabwe has ratified 9 out of 10 of the ILO Fundamental Conventions.[31] Zimbabwe is also a signatory to United Nations Convention Against Corruption.

Gap analysis

Obligations deriving from binding international agreements are not adequately reflected in the procurement legal/regulatory framework resulting in possible non-compliance with such obligations and compromised transparency of all applicable procurement rules. Non-compliance may further negatively affect fair competition in the procurement market especially in instances where special rules may apply to certain groups of bidders.

Recommendations

Consider incorporating an enabling provision in the PPDPAA that requires compliance with obligations arising from international agreements. The provision should include relevant language from the agreements and should make reference to implementation guidance provided in model procurement documents and other procurement policies.

Assessment criterion 3(b)(b):

Clearly indicated in the model procurement documents and/or user's guide or manual for procuring entities, to enable procuring entities to understand when and how to apply them.

Conclusion: High risk gap

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the Constitution). S.34 of the Constitution require that the State must ensure that all international conventions, treaties and agreements to which Zimbabwe is a party are incorporated into domestic law.

[28] COMESA Public Procurement Regulations, Legal Notice No.3 of 2009, COMESA Official Gazette Volume 15 No.3 of 09 June 2009 https://www.comesa.int/wp-content/uploads/2020/05/2009-Gazette-Vol.-15-No3.pdf.

[29] ZimTrade (National Trade Development and Promotion Organisation for Zimbabwe) https://tradezimbabwe.com/trade-agreements/

[30] Source: UN Treaty Body Database: https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=80&Lang=EN.

[31] Source : https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103183.

Pillar I. Legal, Regulatory, and Policy Framework

Qualitative analysis

COMESA Public Procurement Regulations: Although the public procurement legal/regulatory framework in Zimbabwe appears to be aligned with the requirements of the COMESA Regulations, no operational guidance is given to PEs to enable them to understand, implement and comply with the obligations imposed by this or any other international agreement with procurement obligations.

Gap analysis

No operational guidance is provided to procuring entities to enable them to understand, implement and comply with the obligations arising from binding international agreements. This gap results in potential non-compliance with obligations from these agreements and may affect value for money, transparency and competition.

Recommendations

Stemming from the enabling provision recommended in 3(b)(a), incorporate provisions into the PRAZ Procurement Manual and other procurement policies that explain and provide guidance to PEs as to how to implement and comply with obligations arising from international agreements to ensure consistency. The preface in SBDs, for example, should make reference to the agreements and the applicable provisions and include that the user of the SBD should be familiar with procurement obligations arising from the agreements and ensure compliance with obligations. The same would apply to all other model procurement documents.

Pillar II. Institutional Framework and Management Capacity

Indicator 4. The public procurement system is mainstreamed and well integrated into the public financial management system

Sub-indicator 4(a) **Procurement planning and the budget cycle** The legal and regulatory framework, financial procedures and systems provide for the following:
Assessment criterion 4(a)(a): Annual or multi-annual procurement plans are prepared, to facilitate the budget planning and formulation process and to contribute to multi-year planning.
Conclusion: No gap
Qualitative analysis The legislative framework requires preparation and publication of Annual Procurement Plans (APPs). Since roll out of the eGP system in 2024, all procuring entities are required to upload Annual Procurement Plans and subsequent amendments to the eGP system. The APPs and amendments are publicly available on the eGP system. **Annual Procurement Plans**: PPDPAA S.22 Annual Procurement Plan, requires a procuring entity to prepare and submit to PRAZ an annual procurement plan for each financial year using the PRAZ template and containing, as a minimum, prescribed content. R. 7(1) of the PPDPA Regs lists the prescribed content of the Annual Procurement Plan. Since 2024[32] APPs are prepared and submitted by procuring entities using the eGP system and are publicly available from the eGP system through a link on the "Bulletin Board" page, "Annual Procurement Plan" tab.[33] APPs are required to be submitted to PRAZ by 31 January each year. Amendments to APPs are also required to be uploaded, approved and published on the eGP system. In 2025, 90% of the 372 registered procuring entities published procurement plans online.[34] There are no provisions in the PPDPAA or PPDPA Regs which specifically refer to a requirement on PEs to seek and obtain approval of APPs by PRAZ. In practice, the approval of APPs by PRAZ is incorporated as part of the process of annual authorisation for PEs to conduct procurement and is reinforced by MoFEDIP requirements on PEs to provide proof of approval of the APP on the eGP system and confirmation of compliance from PRAZ when making requests for funding. PPDPAA S.15 Authorisation to conduct procurement, provides that a PE shall not initiate or conduct any procurement proceedings for a procurement requirement at or above the prescribed threshold[35] unless the PE has been generally authorised by PRAZ. PEs pay a fee to PRAZ for the authorisation process of between USD 250 and 1000.[36] PRAZ cites PPDPAA S.6(1)(c) and S.7(a) as the statutory basis for directing all PEs to submit their applications to conduct procurement in terms of PPDPAA S.15.[37] [38] PRAZ document "Requirements for Authorization to conduct

[32] Procuring Entities were onboarded to the eGP system in planned phases in 2024. Consequently, APPs were also uploaded in phases in 2024. In 2025 all APPs were required to be uploaded to the eGP system.
[33] https://egp.praz.org.zw/egp-SW5kZXhlcy9nZXRBcHA= accessed 08 September 2025
[34] Note that the number of procuring entities (372) is the number registered with PRAZ M&E department. This is a lower figure than the total number of PEs that registered to use eGP. See analysis at 7(a)(c) - PRAZ is reviewing the status of a small number of entities which were still shown as registered to use eGP at the end of 2025 but who may not have sufficient autonomy to be legitimately registered as procuring entities in their own right.
[35] PPDPAA S.14(a) & PPDPA Regs. R10
[36] SI 2026 No.9 sets fees according to PE category classification, with fees lower than previously: Category A – USD 1000 (previously USD 2000), Category B - A – USD 500 (previously USD 1500), Category C A – USD 250 (previously USD 1000). According to PPDPAA S.15(2)(c), PEs shall apply for authorisation every 2 years. Proposed amendments require authorisation on an annual basis (PPDPA Amendment Bill S.5).
[37] PRAZ Circular OPS/4 of 2024.
[38] PPDPAA S.6(1(c) Functions of the Authority, lists a function of PRAZ "to issue technical guidelines and instructions regarding the interpretation and implementation of [the PPDPAA]". PPDPAA S.7(a) confers power on PRAZ "to issue directions of a general nature to procuring entities regarding the manner in which they are to conduct procurement proceedings in order to ensure

procurement 2026"[39] requires PEs to submit with their application to conduct procurement: the Annual Procurement Plan (excel spread sheet) and Disposal Plan (excel spreadsheet). PEs are also required to submit information relating to the PE's: organisation; staffing; PMU officers' CVs and certified copies of qualifications; Accounting Officer details, and contact details and names, designations and specimen signatures of Evaluation Committee Members and Disposal Committee members.
In August 2024, the MoFEDIP advised PRAZ that it was concerned about low adoption of the eGP system by PEs and in an effort to encourage adoption introduced measures requiring that (1) all requests for funding be accompanied with proof of approval of [the PE's] Annual Procurement Plan on the eGP system, and (2) PEs should attach their proof of confirmation of compliance from PRAZ.[40]

See also, Gaps and recommendations at 9(a)(a) concerning preparation of Annual Procurement Plans.

Individual Procurement Plans: PPDPAA S.23 Individual procurement plan, requires a procuring entity to prepare a procurement plan for each individual procurement above the prescribed threshold value using a PRAZ template. The prescribed threshold values are Works - USD 200,000, Goods USD 100,000 and Services USD 50,000.[41] R.7(2) of the PPDPA Regs lists the prescribed content of the Individual Procurement Plan. PRAZ is required to publish every individual procurement plan submitted to it. In practice, Individual Procurement Plans are captured in the APP planning and approval process.

Gap analysis

Recommendations

Assessment criterion 4(a)(b):
Budget funds are committed or appropriated in a timely manner and cover the full amount of the contract (or at least the amount necessary to cover the portion of the contract performed within the budget period).

Conclusion: High risk gap + red flag

Qualitative analysis
Legal and regulatory provisions require alignment of proposed procurement expenditure with information published in Annual Procurement Plans. Accounting Officers are required to ensure that costs estimates are accurate and that the amount of approved estimates is committed before commencing any procurement process. According to discussions with MOFEDIP, increased stability in the currency is translating into improved compliance.[42] There are, however, systemic problems in practice with the reliability of public finance data, fragmented data sources, budget credibility and PFM commitment controls.

Public Finance Management (Treasury Instructions), 2019 (SI 144 of 2019) [CAP 22:11]) ("Treasury Instructions"), Part XII Procurement of Goods, Services and Works, provides that it is the responsibility of Accounting Officers to ensure that all public procurement activities shall comply with provisions in the PPDPAA with regard to APPs, that are aligned with an authorised budget (S.67(5)). APPs must be prepared using guidelines and templates prescribed by PRAZ. All approved annual procurement plans are required to be uploaded to the PFMS and all requests for procurement must be derived from the APP. (S.67(6)). According to S.67(8) All procurement requests must be justified as to need and there should be proof that the required goods, services, works and consultancy services are "catered for in the procurement plan and budgeted for." This section further provides that Accounting Officers are required to ensure that their Ministries, Departments or Agencies before commencing any procurement process

compliance with [the PPDPAA]" and goes on to include the proviso that PRAZ "shall not issue such directions so as to apply to individual procurement proceedings."
[39] https://www.praz.org.zw/downloads/
[40] PRAZ Circular OPS/2 of 2025.
[41] PRAZ Procurement Manual, 2019, page 19.
[42] Discussions between AfDB PFM team and MOFEDIP, 2025.

shall "ensure that an accurate estimate of the cost of the procurement, including the cost of contingencies that might reasonably be expected to arise under a contract for the procurement has been prepared" and "commit the amount of the estimate in accordance with the provisions of the approved annual estimates enacted in the applicable Appropriation Act". Treasury Instruction S.67(7) requires accounting officers to plan their procurement activities with a view to achieving maximum value for money spend and to ensure that these activities are carried out within available financial resources, at the most favourable time and to aggregate requirements where appropriate to achieve economies of scale.

Approval of Annual Procurement Plans (APPs) by PRAZ and publication on eGP system: as noted at 4(a)(a), APPs are required to be submitted to PRAZ for approval by 31 January each year and are published on the eGP system, together with subsequent amendments. The PRAZ approval process includes checks on whether the PMU is sufficiently resourced to deliver the planned procurements, use of appropriate procurement methods, and advisability of disaggregation of similar requirements. Where, on review of the APP, PRAZ has concerns it refers matters back to the PE (accounting officer). Planned procurement cannot proceed without approval of the APP by PRAZ. In discussions between PEs and the MAPS Assessment team concerns were raised about the extent to which the PRAZ APP approval process was perceived to be straying into transaction related decision making.
See also analysis at 5(d)(a) of Private Sector perception of conflict of interest within PRAZ.

Reform efforts and challenges for ongoing reform: There are ongoing reform efforts[43] to enhance fiscal transparency and accountability and to improve budget oversight through the public finance management system. The December 2024 Interim Review of the Public Finance Management Reform Strategy 2021-2025 (PFMRS Interim Review),[44] prepared on behalf of the MOFEDIP, includes reference to the following challenges for ongoing PFM reform : "[n]on-credible budgets and non-compliance with PFM Act provisions [which] have undermined the effectiveness of fiscal management." and "[d]elayed finance reporting and recurring external audit observations that have been a persistent challenge, affecting the credibility and reliability of financial data." The launch and operationalisation of eGP is acknowledged in the PFMRS Interim Review as a "key cornerstone" of the various procurement reforms (p.2) but in practice the eGP system is not integrated with the SAP-PFM system or other government IT systems. The PFMRS Interim Review (p.13) further notes "an absence of effective expenditure arrears tracking and reporting mechanisms, accommodation of unbudgeted expenditure demands and ineffective commitment controls in the PFMS."
In addition, as reported by the Auditor General[45], MDAs could not access the PFMS for almost 5 months during the currency changeover from ZWL$ to Zimbabwe Gold (ZWG) in 2024 "[d]uring that time most MDAs operated outside the PFMS." Currency instability remains a potential challenge for credibility of the budget and expenditure process although currency changeover has resulted in greater stability. *[See note in Economic Overview section of Volume 1 of this Report, on macro-fiscal issues including the impact of high inflation, currency instability and multi-currency system on public procurement]*. According to the World Bank's Public Finance Review, February 2025,[46] "significant underspending is systematically recorded for the procurement of good and services, and capital expenditure – an indication of ineffective PFM and procurement bottleneck." That report also notes that "a significant share of spending continues to take place outside the Treasury system" and "[a]t present, a large share of expenditures are not captured in the SAP reports and instead processed as direct payments from the Accountant General, making monitoring and reporting of budget execution a challenge."
Fragmentation of PFM data sources in respect of local authorities, parastatals and state-owned enterprises also presents a challenge, with use of different/diverse accounting systems which generally not integrated or linked in with the Treasury System Applications and Products (SAP) accounting system. (see Report Vol.1 section 1.8).

[43] Public Finance Management Reform Strategy 2021-2025.
[44] Public Finance Management Reform Strategy 2021-2025, Interim Review Report, on behalf of the MoFEDIP, December 2024
[45] Summary of Auditor General Report for the Financial Year ended December 31, 2024, page 3.
[46] Zimbabwe Public Finance Review, February 2025. World Bank.
https://documents1.worldbank.org/curated/en/099022425044013834/pdf/P500915-25b3508a-2273-424f-965a-eabd14e9accf.pdf

Gap analysis

Commitment of Budget Funds: The legal and regulatory framework requires commitment of budget funds to cover the cost of the procurement including contingencies. There are, however, systemic problems with the reliability of public finance data, fragmented data sources, budget credibility and PFM commitment controls. Despite ongoing reform efforts, there remain significant weaknesses in current budget planning and execution and currency instability, if this occurs, may present an additional challenge. Unbudgeted expenditure and underspending of budgeted funds is noted and non-availability of funds to meet payments due also occurs. These factors have an adverse impact on the integrity of the budget execution process and reduce supplier confidence in public procurement, leading the MAPS Assessment team to conclude that this criterion is not met.

► Commitment of Budget Funds: This Gap is assigned a Red flag because actions to resolve the gap include those outside the procurement sphere and require inter-institutional cooperation and coordination. Significant improvements in the PFM system are required to improve reliability of public finance data for all procuring entities and PFM commitment controls in support of effective procurement planning and implementation to deliver value for money outcomes. Inter-institutional cooperation and coordination, particularly between PRAZ and MoFEDIP, to ensure interoperability of systems and appropriate data sharing.

Prior approval of Annual Procurement Plans by PRAZ: Thorough, well-informed and timely preparation and publication of Annual Procurement Plans should improve the rigour of procurement planning, budgeting and expenditure by PEs. It should also enhance compliance and promote transparency and accountability of both public procurement processes and the wider public procurement ecosystem. With the introduction of eGP, the inclusion of APP data in that system also provides an excellent opportunity for analysis to assist better understanding of the operation of the public procurement system and strategic decision making. There is, however, a danger that this apparently resource heavy APP approvals process which includes compliance checks on, for example, the choice of procurement method and aggregation of requirements, is interpreted *in practice* as diluting the accountability and/or responsibility of PE accounting officers for planning of procurement and preparation of APPs. The opinion held by some stakeholders that PRAZ is straying into transaction related decision-making may increase the perception that PRAZ has conflicts of interest within its activities, which is not beneficial to PRAZ's role as an independent regulator. As a regulator, PRAZ could instead provide oversight and guidance on best practices through compliance checks and procurement audits, without adding an extra approval step to the procurement process.

Recommendations

Commitment of Budget Funds: Prioritise implementation of PFM reforms to improve reliability of public finance data, budget credibility and PFM commitment controls across all procuring entities. Enhancements to the PFMS and eGP systems will require careful coordination between PRAZ and MoFEDIP to achieve optimum outcomes. Measures to improve the PFMS (and other relevant finance management systems) and eGP from a public procurement perspective, should include ensuring interoperability between the systems at relevant points in the procurement process including alignment of annual procurement planning and budget preparation, tracking of expenditure and to facilitate efficient and timely payment of contractual sums due.

Prior Approval of Annual Procurement Plans by PRAZ: PRAZ to review the appropriateness and scope of the APP approval process as currently structured including: assessment of the best use of PRAZ resources including consideration (in the light of the increasing maturity of the procurement system and greater use of eGP and eGP data availability) of whether other processes such as the SPOC reviews and data analytics will provide sufficient checks and balances; to ensure clear accountability lines *in practice*, and; to avoid the perception that the regulator is over involved in transaction related decision-making.

Assessment criterion 4(a)(c):

A feedback mechanism reporting on budget execution is in place, in particular regarding the completion of major contracts.

Conclusion: High risk gap + red flag

Qualitative analysis

The MAPS Assessment team was unable to find concrete evidence of a comprehensive PFM feedback mechanism reporting on budget execution. Mechanisms for reporting on budget execution in the PFM context appear to be generally limited to authorisation and recording of payments and, as noted in 4(a)(b) data reliability is poor. PRAZ reviews budget execution for selected contracts through its monitoring function but this review process is independent of the PFM system, not comprehensive and is reliant on self-reporting of data by procuring entities.

Monitoring and evaluation of expenditure: According to the World Bank's Public Finance Review, February 2025,[47] "a significant share of spending continues to take place outside the Treasury system" and "At present, a large share of expenditures are not captured in the SAP reports and instead processed as direct payments from the Accountant General, making monitoring and reporting of budget execution a challenge." There is a National Monitoring and Evaluation Policy which sets out to manage the implementation of programmes and projects by the public sector and includes a framework for doing so.[48] MOFEDIP has a Directorate of Expenditure Management responsible for the management of the National Budget as well as monitoring and evaluation of Government programmes and projects including infrastructure development.[49] For PPP contracts, ZIDA has a monitoring and enforcement function and there are draft PPP guidelines being prepared which include provisions to establish PPP joint implementation committees to enhance contract management and delivery. MAPS Assessment team discussion with ZIDA, November 2025.

Note on PRAZ contract monitoring function: PPDPA S.6 Functions of Authority, provides at S.6(1)(a) that one of the functions of PRAZ is "to monitor and supervise procuring entities and the public procurement system in order to secure compliance with this Act, and to implement electronic means of monitoring and supervising procuring entities and the public procurement system". PRAZ captures national procurement statistics through its monitoring processes and submits quarterly reports to key stakeholders including the MOFEDIP. PRAZ also provides feedback to procuring entities. PRAZ's activities include monitoring contract delivery for selected contracts. Contracts selected for monitoring by PRAZ generally involved those which involve ongoing delivery rather than one-off delivery of goods and services and is based on monthly data submitted by procuring entities. Data collected by PRAZ on contracts monitored covers: project and contract title, date of contract signature, contract value, date contractor started/moved on site, planned delivery/completion date, current delivery/completion status (%) and payment status (%). Results of the monitoring are fed back to procuring entities with requests for responses on observations (such as on delays or contract extensions).

The **e-Contract Management Module of the eGP system** facilitates the administration and oversight of procurement contracts after the award stage and incorporates key financial controls, operational tracking and internal and external audit functionalities. The module was rolled out in February 2025, but it is not fully used. (see analysis at 7(a)). Pending full implementation and comprehensive use by all PEs of relevant reporting functions through the eGP system, PEs continue to submit data to PRAZ using standard reporting templates and a manual process. There is no integration between the public finance management system and the eGP system.

Gap analysis

The MAPS Assessment team was unable to find concrete evidence of a comprehensive effective budgetary and financial management system providing timely information on contract execution, in particular covering major budget expenditure, to support the overall financial management system. Lack of empirical data on actual costs

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[47] Zimbabwe Public Finance Review, February 2025. World Bank. https://documents1.worldbank.org/curated/en/099022425044013834/pdf/P500915-25b3508a-2273-424f-965a-eabd14e9accf.pdf

[48] National Monitoring and Evaluation Policy, Government of Zimbabwe. https://twendembele.org/wp-content/uploads/2020/03/National-Monitoring-and-Evaluation-policy-final-corrected_zimbabwe.pdf

[49] MOFEDIP website, accessed 13 January 2026. https://zimtreasury.co.zw/expenditure-management-directorate/#:~:text=The%20Expenditure%20Management%20directorate%20is,the%20Government%20programs%20and%20projects

hinders effective prediction of future budget costs and sparse data on the timing of major contracts have a negative impact on identification of cash flow needs and timeliness of payments.

► This Gap is assigned a Red flag because resolving the gap requires actions to be taken outside the procurement sphere. Wider-reaching public finance reforms consistently applied across government are required and are dependent on inter-institutional cooperation and coordination.

Recommendations
Ensure that the PFMS is consistently and comprehensively used, with functionalities to track and provide timely information on budget execution and contract completion. Ensure that the relevant authorities with responsibilities for and/or active oversight of budget execution for major projects including MOFEDIP, ministries, PRAZ and ZIDA, are fully engaged in enhancements required to the PFMS to provide relevant information and provided interoperability between systems.

See also, recommendation at 4(a)b) on PFM reforms and systems interoperability.

Sub-indicator 4(b)
Financial procedures and the procurement cycle
The legal and regulatory framework, as well as financial procedures and systems ensure that:

Assessment criterion 4(b)(a):
No solicitation of tenders/proposals takes place without certification of the availability of funds.

Conclusion: High risk gap + red flag

Qualitative analysis
The Annual Procurement Plan identifies the budget funds to meet public procurement commitments and there are legal provisions prohibiting commencement of procurement not covered by APPs and individual procurement plans (where applicable). In practice, however, there is unreliable cash availability to cover payments due to suppliers for planned and committed expenditure by MDAs.

Treasury Instructions S.67 (8) requires Accounting Officers to ensure that their Ministries, Departments or Agencies, before commencing any procurement process, ensure that there is an accurate estimate of the cost of procurement and commit the amount of the estimate in accordance with the provision of the approved annual estimates.[50]
Offence for procurement proceedings conducted which are not specified in APP or individual procurement plan: PPDPA Regs R.94(4) Offences, makes it an offence for any procuring entity, without lawful excuse, to engage in procurement proceedings that are not specified in its annual or individual procurement plan or for an individual to induce a procuring entity to engage in procurement proceedings not specified in its annual or individual procurement plan. A body corporate is liable to a fine for committing such an offence and an individual is liable to a fine or imprisonment (not exceeding 6 months) or both.
Non-availability of funds to meet payments due: In practice, MDAs encounter a practical problem of unreliable cash availability to cover payments when they are due to suppliers. The PEFA report[51] published in 2018 flagged this as an issue: "when it comes to spending against set targets, funds are not always readily available throughout the year as and when they are required. The result is that funds are released based on cash availability……. In practice MDAs have planned and committed expenditure without knowing if and when funds to pay for them would be available. It has resulted in accumulation of additional expenditure arrears as at times line Ministries incur expenditure based on initially approved and communicated commitment ceilings (budgetary) only to find that the money is not available when payment is due to the suppliers." This remains an issue. This problem was raised with the MAPS Assessment team by stakeholders in August, during direct engagement and was observed in feedback

[50] Approved annual estimates as enacted in the applicable Appropriation Act.
[51] Report on the Evaluation of the Public Finance Management System of Zimbabwe, Public Expenditure and Financial Accountability (PEFA) Assessment 2017
https://www.pefa.org/node/356

from suppliers in the anonymous MAPS Assessment Private Sector Survey. The Office of the Auditor General also reports that there has been underutilisation of budget which "largely stemmed from inadequate cash support by Treasury".[52] A practical example can be seen in a Value for Money Audit Report published in 2025 by the Office of the Auditor General[53] where it was noted that the Ministry of Primary and Secondary Education "was unable to utilise all the budgeted funds allocated for the construction of schools as part of the budgeted amount was not funded".

National Development Strategy 2 ("NDS2"),[54] includes the following paragraphs which acknowledge expenditure control and resource issues: "271. During NDS2, Government will enhance expenditure management by enforcing strict commitment control systems across all Ministries, Departments and Agencies (MDAs) 271. MDAs will not be permitted to enter into any contractual obligations or commitments arising out of acquisition of goods and services in the absence of Treasury concurrence to confirm budget allocation and availability of resources. 273. Institutional Accountability and Oversight MDAs will be held accountable for any unauthorised commitments that result from un-sanctioned arrears accumulation. 274. Internal audit and monitoring functions will be strengthened to detect and address non-compliance with expenditure controls. Regular arrears monitoring reports will be produced and submitted to Cabinet for enforcement."

NDS2 also references proposed changed to enhance procurement and supplier compliance:
275. "To curb the creation of new arrears, public procurement regulations will be strengthened to prohibit the supply of goods and services without confirmed budgetary support. 276. Suppliers and service providers who transact outside approved budget allocations, where the responsible MDA do not have a corresponding Treasury concurrence, will be restricted or blacklisted from future transactions with Government. 277. Awareness programmes will also be undertaken to ensure all suppliers understand the new compliance requirements."

Gap analysis
The legal and regulatory framework has safeguards to preclude initiation of procurement actions unless funds have been allocated to the procurement in question. In practice, however, expenditure outside the PFMS remains a problem. The lack of effective safeguards jeopardises the transparency and effective functioning of the public procurement system. In addition, procuring entities (MDAs) may plan and commit expenditure without knowing if and when funds to pay for them will be available from Treasury. The systems for procurement, budget and financial management do not interact sufficiently closely and do not guarantee timely payment.
See also, analysis at 4(a)(b) & 4(b)(b).
► This Gap is assigned a Red flag because resolving the gap requires actions to be taken outside the procurement sphere. Wider-reaching public finance reforms consistently applied across government are required and are dependent on inter-institutional cooperation and coordination.

Recommendations
Identify and implement measures to reduce the occurrence of expenditure outside the PFMS and to provide necessary assurance that funds are available for expenditure which is appropriately committed and incurred.

Assessment criterion 4(b)(b):
The regulations/procedures for processing of invoices and authorisation of payments are followed, publicly available and clear to potential bidders.*

Conclusion: High risk gap + red flag

[52] Report of the Auditor General for the Financial Year ended December 31, 2024, on Appropriation Accounts, Finance and Revenue Statements and Fund Accounts, Executive Summary, section 2 Budget Utilisation and Budget Control. https://www.auditorgeneral.gov.zw/

[53] Value for Money Audit Report of the Auditor-General on the Facilitation, Provision and Construction of Schools by the Ministry of Primary and Secondary Education, 2025 [OAG VFM 2025:01].

[54] Republic of Zimbabwe, National Development Strategy 2, January 2026 – December 2030, 27 November 2025.

Qualitative analysis

Regulations/procedures for processing of invoices and authorisation of payments are set out in the PPDPAA, Treasury Instructions and PFM Regulations. These documents are publicly available to potential bidders. There is no regulatory standard requiring payment by procuring entities of undisputed invoices within a specified maximum time period. PPDPAA requires payment to be made within the time-limits set out in the contract and thus the timeframe for payments under contracts can vary. Comprehensive data is not available from the PFMS to permit accurate data-based assessment of the extent to which invoices are processed and paid on time. Direct engagement with supplier stakeholders indicates that delayed payments of undisputed invoices is a common experience and of increasing concern for the supplier community.

Treasury Instructions S.59 Expenditure documentation and validation, provides detailed instructions on both issue of purchase orders and preparation and certification of payment vouchers for payment of invoices issued under the terms of a contract. S.95 Receipt of goods, services, works and consultancy services, includes requirements on receipt and checking of suppliers' invoices. S.97 confirm that it is the responsibility of Accounting Officers "to ensure that payments are made in a timely manner in order to avoid unnecessary expenditure in terms of penalties" and also addresses progress payments and advance payments (in limited cases).

PFM Regs. R.19 Goods and Services, sets out rules applying to public officers dealing with payments. R.22 Arrears in payments, requires the Minister to prescribe requirements for recognising arrears in payments and all invoices received from suppliers to be recorded and payment arrears to reported to the Ministry of Finance in accordance with MoF instructions.

PPDPAA S.82 Payment under procurement contract, requires payment to be made within the time-limits set out in the contract. It also contains provisions on progress payments and advance payments, which are further expanded upon in PPDPA Regs R.63 Advance payments. *(see analysis at 10(b)(b) on post contract value for money (VfM) reviews).*

Comprehensive data is not available from the PFMS to permit accurate data-based assessment of the extent to which invoices are processed and paid on time (see quantitative analysis below). In response to the MAPS Assessment Private Sector Survey, 349 of the 449 responses indicated that invoices are either sometimes (46%) or never (32%) paid on time and in accordance with contract provisions (see quantitative analysis below). In the MAPS Assessment team's direct engagement with supplier stakeholders' problems with late, substantially delayed and non-payment of invoices, particularly by MDAs, was consistently raised as a significant area of ongoing and increasing concern.

The World Bank reported in February 2025[55] that "Discussions with suppliers suggest they see an average of 9 months to 1.5 years to receiving government payments."

Quantitative analysis

** Quantitative indicator to substantiate assessment of sub-indicator 4(b) Assessment criterion (b):*
- invoices for procurement of goods, works and services paid on time (in % of total number of invoices).
Source: PFM systems.

Data not available: PFMS has capacity to provide data on payment of invoices, but MoFEDIP informed the MAPS Assessment team that collated data on creditor age analysis across MDAs is not available.[56]

Results of the Private Sector Survey Questionnaire: In response to the statement "Invoices are paid on time and in accordance with contract provisions", 46% of the 449 responses recorded that this was "sometimes" the case and 32% recorded that this was "never" the case. (see below).

[55] Zimbabwe Public Finance Review, Anchoring Macroeconomic Stability Through Fiscal Policy, World Bank Group, February 2025.
[56] MAPS Assessment team meeting with MOFEDIP, November 2025.

Source: MAPS Assessment Private Sector Survey Questionnaire, summary results, October 2025

Gap analysis

There are regulations/procedures for processing of invoices and authorisation of payments set out in the PPDPAA, Treasury Instructions and PFM Regulations which are publicly available to potential bidders and payments are to be made in accordance with contractual provisions. Thus, the legal and regulatory framework provides for timely processing, authorisation and payment. In practice, however, financial procedures and Treasury management processes do not function to ensure payment of invoices in a timely manner and in accordance with contractual provisions.

► This Gap is assigned a Red flag because resolving the gap requires improvements to ensure prompt payment of invoices, which lie outside the procurement sphere.

Recommendations

Improve Treasury management processes and practices to ensure payment of invoices in a timely manner and in accordance with contractual provisions.

Indicator 5. The country has an institution in charge of the normative/regulatory function

Sub-indicator 5(a)

Status and legal basis of the normative/regulatory institution function

The legal and regulatory framework, financial procedures and systems provide for the following:

Assessment criterion 5(a)(a):

The legal and regulatory framework specifies the normative/regulatory function and assigns appropriate authorities formal powers to enable the institution to function effectively, or the normative/regulatory functions are clearly assigned to various units within the government.

Conclusion: No gap

Qualitative analysis

PPDPA ss. 5, 6 and 7 provides for the establishment of the Procurement Regulatory Authority of Zimbabwe (PRAZ) and lists the functions and powers of PRAZ to enable it to function effectively as the regulatory authority for public procurement in Zimbabwe.

S.5 of the PPDPAA establishes the Procurement Regulatory Authority of Zimbabwe (PRAZ).
S.6(1)(a)-(o) of the PPDPAA lists the Functions of PRAZ.

S.7 of the PPDPAA sets out the Powers of PRAZ in the exercise of its function. S.6(1)(a) of the PPDPAA provides that a function of PRAZ is to ensure that public procurement is effected in a manner that is transparent, fair, honest, cost-effective, competitive and in compliance with this Act; and in S.6(1)(b) that it must monitor and supervise procuring entities and the public procurement system in order to secure compliance with this Act, and to implement electronic means of monitoring and supervising procuring entities and the public procurement system. A procuring entity is defined in S.2 of the PPDPAA (see analysis at 6(a)(a). PRAZ is further given the function to issue technical guidelines and instructions regarding the interpretation and implementation of the PPDPAA in S.6(1)(c). The regulatory function is thus assigned to PRAZ, including oversight of procuring entities.
Gap analysis
Recommendations
Sub-indicator 5(b) **Responsibilities of the normative/regulatory function** The following functions are clearly assigned to one or several agencies without creating gaps or overlaps in responsibility:
Assessment criterion 5(b)(a): providing advice to procuring entities
Conclusion: No gap
Qualitative analysis PRAZ is given the responsibility to advise procuring entities on request in S.6(1)(g) of the PPDPAA "provided that no such advice or assistance shall limit the responsibilities of a procuring entity for compliance with this Act".
Gap analysis
Recommendations
Assessment criterion 5(b)(b): drafting procurement policies
Conclusion: No gap
Qualitative analysis One of the objectives of the PPDPAA is to secure the implementation of any environmental, social, economic and other policy that is authorised or required by any law to be taken into account by a procuring entity in procurement proceedings in S.4(e) PPDPAA. In line with this, one of the functions of the PRAZ is to "develop and advise the Government on ways in which the environmental, social and economic policies of Zimbabwe, including those designed for economic empowerment and domestic preferences, may be implemented through public procurement" in S.6(1)(j) PPDPAA.
Gap analysis
Recommendations
Assessment criterion 5(b)(c): proposing changes/drafting amendments to the legal and regulatory framework
Conclusion: No gap
Qualitative analysis

S.6(1)(n) of the PPDPAA provides that a function of PRAZ is to recommend amendments to the law regarding public procurement, in the light of international practices and experience.

Gap analysis

Recommendations

Assessment criterion 5(b)(d):
monitoring public procurement

Conclusion: No gap

Qualitative analysis

S.6(1)(a) of the PPDPAA provides that a function of PRAZ is "to ensure that public procurement is effected in a manner that is transparent, fair, honest, cost-effective, competitive and in compliance with this Act". S.6(1)(b) of the PPDPAA allocates responsibility to PRAZ to "monitor and supervise procuring entities and the public procurement system in order to secure compliance with this Act, and to implement electronic means of monitoring and supervising procuring entities and the public procurement system". To this end, S.7 of the PPDPAA provides that PRAZ has the power to:

(a) issue directions of a general nature to procuring entities regarding the manner in which they are to conduct procurement proceedings in order to ensure compliance with this Act: Provided that the Authority shall not issue such directions so as to apply only to individual procurement proceedings;
(b) to require procuring entities to collect information regarding procurement and to provide the Authority with such information in such form, and at such intervals or within such periods, as the Authority may direct;
(c) to require any procuring entity or bidder to produce or disclose to the Authority, or to an officer or agent of the Authority, any information, document, record or report regarding any aspect of the procurement, contract implementation or disposal process where a breach, wrongdoing or mismanagement has been alleged, reported or proven against any procuring entity.

The responsibility to monitor public procurement therefore lies with PRAZ.

Gap analysis

Recommendations

Assessment criterion 5(b)(e):
Answering questions and requests of information about the procurement regulation and functioning

Conclusion: No gap

Qualitative analysis
Other than the power to advise procuring entities on request in terms of S.6(1)(g) of the PPDPAA, there is no specific duty or function to answer questions and request information about the procurement regulation and functioning, although, it may be implied in the advisory function given to PRAZ.

Gap analysis

Recommendations

Assessment criterion 5(b)(f):
preparing reports on procurement to other parts of government

Conclusion: No gap

Qualitative analysis

S.11 of the PPDPAA regulates reports to Parliament. It provides that:

(1) Subject to this section, as soon as possible after the end of each financial year, the Authority shall provide Parliament, through the Minister, with a report setting out—
 (a) the Authority's activities during the year; and
 (b) the overall functioning of the public procurement and asset disposal system in Zimbabwe; and
 (c) any recommendations the Authority may wish to make on revising and improving procurement procedures; and
 (d) any other matters the Authority wishes to bring to the attention of the Government and Parliament.

(2) On receipt of an annual report, the Minister shall without delay lay it before Parliament.

(3) In addition to the annual report, the Authority—
 (a) may submit to the Minister reports on such matters relating to the public procurement or asset disposal system of Zimbabwe as the Board wishes to bring to the Minister's attention; and
 (b) shall provide the Minister with such reports and information regarding the public procurement or asset disposal system of Zimbabwe as the Minister may reasonably require.

Gap analysis

Recommendations

Assessment criterion 5(b)(g):
developing and supporting implementation of initiatives for improvements of the public procurement system

Conclusion: No gap

Qualitative analysis

S.6(1)(m) and (n) of the PPDPAA provide respectively that PRAZ has the power to consult regularly with persons in the public and private sectors who have an interest in the public procurement system, in order to assess their perception of the system and to recommend amendments to the law regarding public procurement, in the light of international practices and experience. Although the provisions do not pertinently refer to the implementing of initiatives for improvements, they are geared toward efforts aimed at improving the public procurement system by assessing perceptions and recommending amendments in line with international best practice.

Gap analysis

Recommendations

Assessment criterion 5(b)(h):
providing tools and documents, including integrity training programmes, to support training and capacity development of the staff responsible for implementing procurement

Conclusion: No gap

Qualitative analysis

S.6(1)(h) of the PPDPAA provides that PRAZ has the authority to promote the training and professional development of persons engaged in public procurement so as to ensure their adherence to high ethical standards.

Gap analysis

Recommendations

Assessment criterion 5(b)(i): supporting the professionalisation of the procurement function (e.g. development of role descriptions, competency profiles and accreditation and certification schemes for the profession)
Conclusion: No gap
Qualitative analysis Pursuant to S.6(1)(h), PRAZ has the authority to promote the training and professional development of persons engaged in public procurement in R. 89 of the PPDPA Regs so as to ensure their adherence to high ethical standards. To date, the professionalisation of the procurement function is still under development by PRAZ, however, the legal authority to do so exists in R.89 above. In addition, the Public Service Act Chapter 16:04 establishes the Public Service Commission (PSC) that is responsible for training public servants in Zimbabwe in general. During discussions between the MAPS Assessment team and PRAZ in November 2025 it was established that no conflict of interest exists based on the PSC's provision of training in basic public service skills and PRAZ's training of knowledge-based skills specific to the procurement profession
Gap analysis
Recommendations
Assessment criterion 5(b)(j): designing and managing centralised online platforms and other e-Procurement systems, as appropriate
Conclusion: No gap
Qualitative analysis E-procurement is defined in S.2 of the PPDPAA as "the procurement of goods, construction works or services through Internet-based information technology". One of the functions of PRAZ in S.6(1)(e) of the PPDPAA is to "develop the use of electronic tools for procurement, including a public procurement website and statistical databases containing information on public procurement in Zimbabwe, and specify the conditions under which such databases will be availed to the public" and in S.6(1)(f) "to enable the publication on the website referred to in paragraph (e) of documents that are required to be published by procuring entities." The responsibility for designing and managing a centralised online platform therefore lies with PRAZ. To this end, an e-government procurement (GP) system has been developed by PRAZ for which a user manual has been created.
Gap analysis
Recommendations
Sub-indicator 5(c) **Organisation, funding, staffing, and level of independence and authority**
Assessment criterion 5(c)(a): The normative/regulatory function (or the institutions entrusted with responsibilities for the regulatory function if there is not a single institution) and the head of the institution have a high-level and authoritative standing in government.
Conclusion: No gap
Qualitative analysis PRAZ is established as a statutory regulatory authority. PRAZ reporting line is direct to the Office of the President and Cabinet (OPC). This reporting line endorses the standing of PRAZ as an institution and provides the opportunity for PRAZ to share critical issues at high level within government. It also assists to ensure that PRAZ has necessary authority as a regulator engaging with procuring entities including ministries and parastatals and this is reflected in practice.

Establishment: PPDPA Part II PRAZ and First Schedule PRAZ is a statutory regulatory body established by the PPDPAA and falls within the definition of a "statutory body" governed by the Public Entities Corporate Governance Act [Ch.10:31]. *See analysis at 5(a).* PRAZ reporting line is direct to the Office of the President and Cabinet (OPC). In that context, PRAZ reports to the Vice President responsible for Procurement and Research[57] and is thus appropriately placed within the reporting structure. This reporting line endorses the standing of PRAZ as an institution and provides the opportunity for PRAZ to share critical issues at high level within government.[58] It also assists to ensure that PRAZ has necessary authority as a regulator engaging with procuring entities including ministries and parastatals. According to PRAZ, the functions of PRAZ are now well aligned with the National Development Strategy thematic areas and pillars, further strengthening its position as regulator. **Appointment and position of CEO:** PECG Act S.17 Appointment of chief executive officers of public entities, applies to the appointment of the Chief Executive of PRAZ. This requires public advertisement of the post and interview process. Appointment is by the Board of PRAZ with the approval of the President. CEO is appointed for a term of no longer than 5 years, which term may be renewed for one further such term.
Gap analysis
Recommendations
Suggestions for improvement: The MAPS criterion requires that the head of the normative/regulatory function, i.e. PRAZ, commands sufficient authority within the governance structure to enable the institution to exercise its responsibilities. Public procurement data is an increasingly important strategic tool to identify national trends and support implementation of national priorities (see NDS2). Effective monitoring and support for planning and execution of public procurement should result in improved value for money outcomes at all levels of government. With this in mind it is appropriate to consider whether the current position of the CEO provides sufficiently high level and authoritative standing in government to enable PRAZ to effectively exercise the full range of its responsibilities.
Assessment criterion 5(c)(b): Financing is secured by the legal/regulatory framework, to ensure the function's independence and proper staffing.
Conclusion: No gap
Qualitative analysis **Statutory provision:** PPDPAA First Schedule, Part IV - Financial Provisions provides that the funds of PRAZ shall consist of: " (a) any moneys that may be appropriate for the purpose by Parliament; and (b) any loans, donations and grants which [it] receives, with the approval of the Minister, from any person or authority or from the government of any country; and (c) any other moneys that may accrue [to PRAZ], whether in the course of its operations or otherwise." **Self-funding in practice:** PRAZ is a grant receiving authority but in practice, for recurrent expenditure PRAZ is self-sustaining and since 2024 it has been in a position to invest surpluses.[59] Self-financing facilitates PRAZ' ability to act more quickly and provides flexibility to attract talent as well as enhancing its independence of operation. **Primary sources of income for PRAZ are:** fees paid by procuring entities including for applications to conduct procurement and applications for exemptions; fees paid by suppliers including for registration as a registered

[57] SI 22A of 2019 Assignment of Functions (The Honourable Vice-President responsible for Procurement and Research) Notice, 2019, Government Gazette 20 February 2019.
[58] Confirmed in discussions between MAPS Assessment Team and PRAZ, October 2025.
[59] PRAZ Annual Report 2022, p.5.

supplier and renewals, bid establishment fees, contract administration fees; capacity building – training programmes and events, conferences.

Gap analysis

Recommendations

Assessment criterion 5(c)(c):
The institution's internal organisation, authority and staffing are sufficient and consistent with its responsibilities.

Conclusion: No gap

Qualitative analysis
PRAZ head office is in Harare and in 2025 a second office opened in Bulawayo.
PRAZ is organised into the following Divisions and Departments:
Operations Division: authorisation of PEs to participate in public procurement, issuing of circulars, technical guidelines and instructions, registration of bidders and suppliers through PRAZ portal, technical support to the Special Procurement Oversight Committee (SPOC).
Monitoring and Evaluation Division: compliance, monitoring and evaluation assessments and quarterly reports.
Capacity Building Directorate: training and professional development of all persons engaged in public procurement. Training, symposia, conferences. Ongoing development of capacity building activities will be reflected in a revised structure for the Capacity Building Directorate.
Corporate Services: secretarial support services to PRAZ Board and Special Procurement Oversight Committee (SPOC), Review and Debarment Panels. Business Development and Strategy including MOUs
Information and Communication Technologies (ICT) Department: eGP system, ISO Quality Management System, Cyber Security, Zimpost Community Information Centres, ICT disaster recovery and business continuity.
Corporate Communication, Human Resources and Administration, Finance, Internal Audit
CEO's office: includes Strategy and Risk Department and PMU.
PRAZ Staffing: PRAZ has a staff establishment of 85 permanent staff with 65 permanent staff currently employed, plus 10 interns (on attachment as part of corporate social responsibility agenda/work experience as part of courses) and 12 graduate trainees. According to PRAZ, unfilled vacancies were pre-planned, reflecting the transition to eGP which means that required staffing levels on full adoption of eGP are uncertain.

Gap analysis

Recommendations

Sub-indicator 5(d)
Avoiding conflict of interest

Assessment criterion 5(d)(a):
The normative/regulatory institution has a system in place to avoid conflicts of interest.*

Conclusion: No gap

Qualitative analysis
PRAZ has a documented system and operational structure and practices in place to avoid organisational conflicts of interest. PRAZ has a code of ethics applying to board members and employees which includes conflicts of interest provisions and there is a requirement to sign an Annual Compliance Certificate.

Despite having relevant measures in place to manage potential conflicts of interest within PRAZ, the private sector anonymous survey showed in 19% of cases respondents were of the opinion that there are abundant conflicts of interest in PRAZ relating to its functions and activities in the public procurement system.

PRAZ's institutional set up and operating structure creates 2 programmes, separating support from operational functions, in recognition of the potential conflict between its functions. There are weekly management sessions where reports from sub-divisions are presented, presenting the opportunity to identify and manage potential or actual conflicts of interest, in accordance with Standard Operating Procedures. PRAZ also promotes in internal culture of learning together, using "learning circles" to clarify roles and channel relevant queries. Directors, Senior Management Executives and employees of PRAZ are required to sign an Annual Compliance Certificate affirming compliance with the Code of Ethics for the Procurement Regulatory Authority (PRAZ), [60] which includes conflict of interest provisions (see below).
In addition, provisions in the Public Entities Corporate Governance Act on Conflicts of Interest and Declaration of Assets apply to board members and senior staff of PRAZ. (See analysis at 14(a)(c)).

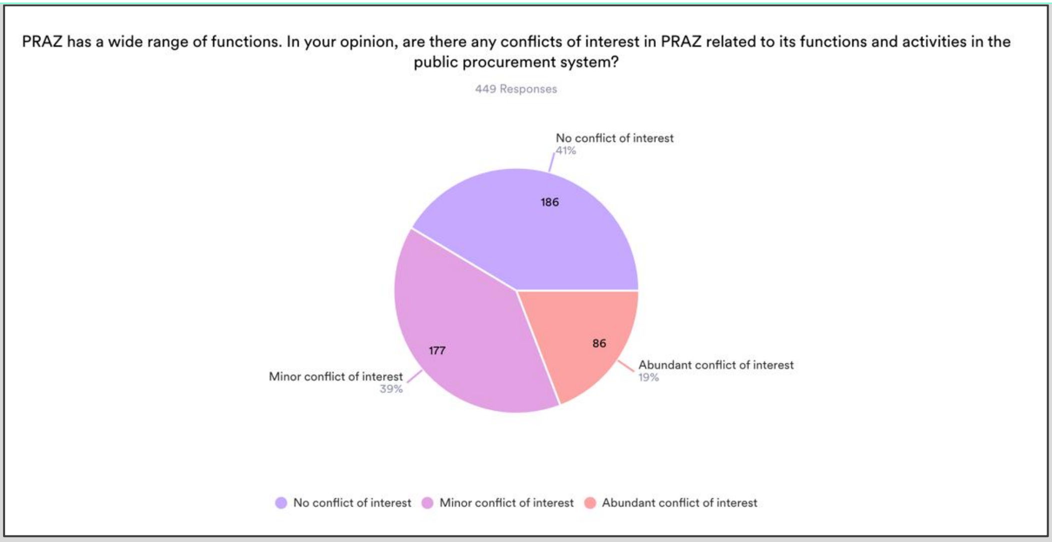
Conflicts of Interest provisions - PRAZ Code of Ethics, **section "Conflict between Official Duties and Private Interests"** provides that board members and employees must not do anything that prevents or hinders them from carrying out their official duties impartially and include particular reference to: not giving preference to of favouring a supplier in exchange for any personal benefit to themselves, families or friend; not having personal interest in any business transaction the conduct on behalf of PRAZ; not using their position for personal gain; not engaging in activity competing with or hindering PRAZ and not taking advantage of or using PRAZ property for personal gain or to compete with PRAZ. Board members and employees must withdraw from any official action or decision-making process which may result in improper personal gain.

Despite having relevant measures in place to manage potential conflicts of interest within PRAZ, the private sector anonymous survey showed that in 19% of cases respondents were of the opinion that there are abundant conflicts of interest in PRAZ relating to its functions and activities in the public procurement system. 39% were of the opinion that there are minor conflicts of interest. The perception of conflict of interest (COI) may be linked to a number of issues including misunderstanding or lack of clarity as to: the way in which PRAZ operates in practice and its role as a regulator; measures it has in place to manage potential COI ; the role of PRAZ in SPOC process and decision making, and; PRAZ's activities in approving Annual Procurement Plans[61]
See also, 4(a)(b) for further analysis, Gap and Recommendations to address this perceived of conflict interest. See also Suggestions for improvement below.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 5(d) Assessment criterion (a):*
- Perception that the normative/regulatory institution is free from conflicts of interest (in % of responses).

[60] https://www.praz.org.zw/wp-content/uploads/2024/07/CODE-OF-ETHICS-FOR-PRAZ-BOARD-AND-FOR-SENIOR-STAFF.pdf accessed 28 September 2025
[61] Drawn from direct discussions between the MAPS Assessment Team and stakeholders.



Source: Private Sector Survey.

Gap analysis

Recommendations

Suggestions for improvement

PRAZ should consider exploring further the reasons why it is perceived by the private sector that PRAZ has conflicts of interest in its functions and activities. This is in order for PRAZ both to address those concerns and improve how it communicates the nature of its regulatory role and activities and the measures it has in place to prevent and manage potential conflicts of interest.

See 4(a)(b) for further analysis, Gap and Recommendations to address this perceived of conflict interest.

Indicator 6. Procuring entities and their mandates are clearly defined

Sub-indicator 6(a)
Definition, responsibilities and formal powers of procuring entities
The legal framework provides for the following:

Assessment criterion 6(a)(a):
Procuring entities are clearly defined.

Conclusion: No gap

Qualitative analysis

Procuring entities are clearly defined in PPDPAA S.2 to cover (in summary): ministries, departments or other divisions of the Government; corporate bodies established for special purposes laid down in an act (including parastatals); state owned enterprises; provincial or metropolitan councils or a local authority, and: prescribed partnerships or joint ventures between the State and any person.

Procuring entity is defined as in S.2 of the PPDPAA:

(a) a Ministry, department or other division of the Government; or
(b) a corporate body established by or in terms of any Act for special purposes laid down in that Act; or
(c) any company in which the State has a controlling interest, whether by virtue of holding or controlling its shares or by virtue of a right of appointment of members to its controlling body or otherwise, and

includes any company which is a subsidiary, as determined in accordance with section 143 of the Companies Act *[Chapter 24:03]*, of such a company;[62] or

(d) a provincial or metropolitan council or a local authority; or

(e) any partnership or joint venture between the State and any person, which is prescribed in terms of this Act or the Public Finance Management Act *[Chapter 22:19]* (No. 11 of 2009);

This definition brings SOEs and parastatals within coverage of the PPDPAA, as discussed under criterion 1(a)(b).

In 2025, the total number of PEs registered with PRAZ was 372, comprising 29 ministries, 92 local authorities, 237 parastatals (SOEs fall within this category) and 14 commissions.

Procuring entities, as defined by S.2 PPDPAA may be exempted in whole or in part from the application of the PPDPAA. The analysis at 1(a)(b) lists the exemptions available under S.3 PPDPAA including exemptions granted by PRAZ to individual procuring entities in respect of particular provisions on the PPDPAA.

Mutapa Investment Fund and Mutapa portfolio companies: At the end of September 2023, Mutapa Investment Fund (MIF) (the sovereign wealth fund of Zimbabwe) was exempted by Presidential Notice[63] from the application of the PPDPAA. The exemption relied on recent amendments to PPDPAA S.3(9),[64] allowing for Presidential exemptions to be granted for public entities where they are operating in competitive markets and/or are managed by a third party under a management contract. MIF manages a portfolio of 30 plus state owned companies and their subsidiaries. In February 2024, a Presidential Notice[65] exempted 16 MIF portfolio companies from the application of the PPDPAA on the grounds set out in PPDPAA S.3(9).

During 2024, the PPDPAA was amended to insert further provisions at PPDPAA S.3 (10) to 3(14), relating to entities exempted under PPDPAA S.3(9).[66] These provisions include a requirement that exempted entities must still comply with guidelines issued by PRAZ regulating their procurement practice. They also provide for PRAZ to investigate alleged violation of the guidelines and make recommendations and for the possibility of the President withdrawing the exemption of the entity concerned. In mid-November 2024, MIF requested an exemption from the PPDPAA for 15 additional portfolio companies. On 29 November 2024, PRAZ issued a circular addressed to all accounting officers of MIF public entities (Circular OPS/3 of 2024)[67] noting that PEs operating in competitive markets need to separate their requirements into: (1) procurement requirements for commercial activities affected by competition, and (2) procurement of general nature which can be procured using normal tender procedures. Circular OPS/3 of 2024 confirmed that PEs operating commercial business units or in competitive markets may require and seek exemptions from specific provisions of the PPDPAA on a case-by-case basis. Circular OPS/3 of 2024 sets out a non-exhaustive list of the exemptions and directs that PEs under the MIF must submit applications for exemptions requirements with provisions on the PPDPAA (using a template developed for that purpose).[68] Circular OPS/3 of 2024 also directs that PEs under the MIF must submit their applications to conduct procurement for the year 2025 (*the APP submission and approval process - see analysis at 4(b))* and confirms that that all procurements must be incorporated into APPs.

[62] Including the Mutapa Investment Fund as explained under criterion 1(a)(b).

[63] Presidential General Notice 1546 of 2023, Government Gazette Extraordinary, 29th September 2023 https://gazettes.africa/akn/zw/officialGazette/government-gazette/2023-09-19/97/eng@2023-09-19 and later implemented

[64] S.18, Part III of SI 156 of 2023 Presidential Powers (Temporary Measures) (Investment Laws Amendment) Regulations, 2023 [CAP.10.20], Gazetted 19th September 2023. S.3(9) was subsequently amended by S.53 of the Finance Act 2023 to read as follows: "The President of the Republic of Zimbabwe, in consultation with the Authority, and by notice in the Gazette, may exempt from the application of this Act a prescribed public entity operating in competitive markets or which is managed under a management contract by a third party which is not a public entity."

[65] General Notice 164B of 2024, Government Gazette Extraordinary, 8th February 2024 https://gazettes.africa/akn/zw/officialGazette/government-gazette/2024-02-08/12/eng@2024-02-08

[66] S.29 of the Finance Act 2024 [Ch:23:04] (Act No.2 of 2024).

[67] https://www.praz.org.zw/wp-content/uploads/2026/02/CIRCULAR-No-Ops-3-of-2024.pdf

[68] See 1(a)(b) for analysis of relevant exemption provisions under s.3(7) of the PPDPAA.

At the end of December the Sovereign Wealth Fund of Zimbabwe Act was amended[69] to include a requirement on the MIF to ensure that entities listed in the Fourth schedule to that Act[70] establish and maintain "an appropriate procurement and provisioning system that is fair, equitable, transparent, competitive and cost-effective" supported by a compliance policy and system, as well as a system for properly evaluating all major capital projects. Listed entities include government owned companies whose shares were vested in MIF when MIF was capitalised in September 2023.
Gap analysis
Recommendations
Assessment criterion 6(a)(b): Responsibilities and competencies of procuring entities are clearly defined.
Conclusion: No gap
Qualitative analysis Part III of the PPDPAA regulates the responsibility for procurement and procuring entities. In particular, S.14 regulates the responsibility for procurement which lies with procuring entities. S.15 regulates the authorisation needed to conduct procurement and sets out the duties of accounting officers in procuring entities in S.16. The accounting officer is the person with authority to make decisions related to procurement.
Gap analysis
Recommendations
Assessment criterion 6(a)(c): establish a designated, specialised procurement function with the necessary management structure, capacity and capability.*
Conclusion: No gap
Qualitative analysis Section 17 of the PPDPAA provides for the establishment of a procurement management unit (PMU), headed by the accounting officer, which is responsible for managing all procurement activities in a procuring entity. The accounting officer determines the size, structure and location of a PMU based on the procuring entity's requirements and the availability of trained and experienced staff. The functions of the PMU are set out in section 17(3) and where a procuring entity's activities do not justify the need for establishing a PMU, procurement activities of that entity can be performed by the entity's parent body or by another procuring entity's PMU under section 17(4). Alternatively, an independent procurement agent can be appointed to fulfil this function.

[69] Finance (No.2) Act 2024 (Act No.7 of 2024) s.50 amended the Sovereign Wealth Fund of Zimbabwe Act to insert s.25B. https://archive.gazettes.africa/archive/zw/2024/zw-government-gazette-dated-2024-12-31-no-100.pdf

[70] SI 156 of 2023 Presidential Powers (Temporary Measures) (Investment Laws Amendment) Regulations, 2023 [CAP.10.20], Gazetted 19th September 2023: Listed entities include government owned companies whose shares were vested in MIF when MIF was capitalised in September 2023.

Quantitative analysis

** Quantitative indicator to substantiate assessment of sub-indicator 6(a) Assessment criterion (c):*
- procuring entities with a designated, specialised procurement function (in % of total number of procuring entities).

100% of procuring entities have PMU function.
Source: Normative/regulatory function.

Gap analysis

Recommendations

Assessment criterion 6(a)(d):
Decision-making authority is delegated to the lowest competent levels consistent with the risks associated and the monetary sums involved.

Conclusion: Low risk gap

Qualitative analysis
Section 14 of the of the PPDPAA regulates responsibility for procurement which lies with the accounting officer of each PE. "Within any procuring entity, responsibility for ensuring that its procurement activities are carried out in compliance with this Act and any directions of the Authority shall devolve upon (a)the entity's accounting officer and (b) within their spheres of responsibility, the members of the entity's procurement management unit and the entity's, employees and agents who are involved in any way with procurement." The spheres of responsibility are not specified in the Act or the Regulations.

Section 70 of the PPDPAA regulates the conduct of procurement officers, including the requirements for the decision-making in that it should be based on adequate information, ensure fair competitive access by bidders, avoid conflicts of interest, etc. However, the subject of the decisions they may make is not regulated. A procurement officer is an "officer, employee or agent of a PE who is responsible for any aspect of the entity's procurement, including the implementation of procurement contracts."

PEs confirmed in discussions with the MAPS Assessment team that schemes of delegation are set out in PEs' own standard operating procedures (SOPs). Some of the PEs with whom the MAPS Assessment team engaged commented that some SOPs are out of date and not fully aligned with current legislation, whilst others confirmed that they had recently updated their procedures. PEs were unable to confirm whether there are model forms for schemes of delegation.

Gap analysis
Whilst there are schemes of delegation for decision making in procurement set out in Standard Operating Procedures (SOPs) at PE level, some of these SOPs are out of date and not well aligned with current procurement legislation. This reduces the relevance and effectiveness of the scheme of delegation.

Recommendations
Where not currently available, consider preparing model schemes of delegation aligned with current legislation for use by procuring entities and which may be adapted to reflect the particularities of a PE's organisation and structure. Consider measures to ensure that PEs adopt schemes of delegation which are up to date and aligned with current legislation.

Assessment criterion 6(a)(e):
Persons involved in procurement processes are accountable for their actions

Conclusion: No gap

Qualitative analysis

The conduct of procurement officers is regulated in section 70 which provides for the requirements of their conduct and consequences for contravening the provisions. Consequences include being found guilty of misconduct; a military offence; omitting or neglecting to perform a duty; a breach of discipline; a breach of conditions of employment (S.70(4)(b)(i)-(v)) and will be subject to disciplinary action or any other appropriate sanction or punishment. R.90 of the PPDPA Regs provides that notwithstanding anything to the contrary in their employment contracts, procurement officers shall be subject to the disciplinary provisions set out in Schedule Four to the PPDPA Regs.
Gap analysis
Recommendations
Sub-indicator 6(b) **Centralised procurement body**
Assessment criterion 6(b)(a): The country has considered the benefits of establishing a centralised procurement function in charge of consolidated procurement, framework agreements or specialised procurement.
Conclusion: No gap
Qualitative analysis There is no single centralised procurement function in charge of consolidated procurement or framework agreements. The country has, however, considered and adopted various measures to increase procurement efficiency. There are provisions in the PPDPAA allowing for shared procurement arrangements through joint framework agreements but currently there is no joint procurement pursuant to these provisions. Framework agreements are used by procuring entities for procurement of common use items. There are examples of specialised or sector-based procurement functions. A National Standardised Price List for 42 product categories is also being prepared. **Shared procurement provisions:** PPDPAA S.22 Shared procurement among procuring entities, allows for PRAZ to direct any group of two or more procuring entities to conduct their procurement by way of shared procurement arrangements and to negotiate a framework arrangement. This is where, having reviewed APPs prepared by PEs, PRAZ considers that shared procurement using a framework arranged is appropriate and expedient. At present there is no joint procurement pursuant to these provisions **Use of framework agreements:** Procuring entities use framework agreements for the procurement of common use items. These are generally multi-supplier ("open") framework agreements which can be established for a period up to a maximum of 3 years. Award of contracts under multi-supplier/open framework agreements are made following mini-competitions and following due diligence on price. Multi-supplier/open framework agreements can be re-opened to invite new suppliers to apply to join. All framework agreements are subject to approval by Strategic Procurement Oversight Committee (SPOC). **Specialised/sector-based procurement:** There are some examples of specialised or sector-based procurement functions. such as: NatPharm which procures medical supplies on a national basis; procurement of uniforms for all forces now led by MoFEDIP and consolidated procurement by the Ministry of Health. **National Standardised Price List:** PRAZ has been involved in a joint project taskforce with the MOFEDIP, ZIMSTATS, OPC and the National Competitiveness Commission (NCC) to prepare a National Standardised Price List to serve as a reference guideline for decision makers when procuring the 42 categories of items covered, with prices subject to regular review. This list was not yet published at the conclusion of the MAPS Assessment document review period.[71]
Gap analysis

[71] 31 December 2025.

Recommendations

Suggestions for improvement
To further enhance the efficiency of public spending, it is suggested that PRAZ conducts a feasibility study for the practical implementation of a transversal, cross-sector central purchasing function. This study should aim at centralising the procurement of the main categories of works, goods, and services (top spenders) of common use within the public administration, while maximizing the utilisation of framework agreements for use by multiple PEs, e-catalogues, e-reverse auctions and the electronic government procurement (eGP) system.

Assessment criterion 6(b)(b):
In case a centralised procurement body exists, the legal and regulatory framework provides for the following:
• Legal status, funding, responsibilities and decision-making powers are clearly defined.
• Persons involved in centralized procurement processes are accountable for their actions.
• The body and the head of the body have a high-level and authoritative standing in government.

Conclusion: Not applicable

Qualitative analysis

Gap analysis

Recommendations

Assessment criterion 6(b)(c):
The centralised procurement body's internal organisation and staffing are sufficient and consistent with its responsibilities.

Conclusion: Not applicable

Qualitative analysis

Gap analysis

Recommendations

Indicator 7. Public procurement is embedded in an effective information system

Sub-indicator 7(a)
Publication of public procurement information supported by information technology
The country has a system that meets the following requirements:

Assessment criterion 7(a)(a):
Information on procurement is easily accessible in media of wide circulation and availability. Information is relevant, timely and complete and helpful to interested parties to understand the procurement processes and requirements and to monitor outcomes, results and performance.

Conclusion: Medium risk gap

Qualitative analysis
Information on procurement is accessible through a number of different media including the Government Gazette, the PRAZ website, social media and the electronic Government Procurement (eGP) portal operational from January 2024. In addition, to enhance access to information and provide closer support to the bidder community in understanding procedures and using the eGP system, PRAZ has worked with Zimpost to establish 191 Community Information Centres (CICs) through the physical office network of Zimpost.

Pillar II. Institutional Framework and Management Capacity

Public procurement information in Zimbabwe is disseminated through a combination media: the Government Gazette, the PRAZ website, social media and the electronic Government Procurement (eGP) portal operational from January 2024.

- **Selected Editions of the Government Gazette** serves as the primary official publication media for procurement-related information, including invitations to bid, contract award notices, and registered suppliers lists with contact details. Digital (PDF) versions of the Gazette are accessible via the PRAZ website, enhancing public accessibility. Nevertheless, the online archive is relatively recent, as only selected editions of the Gazette published during 2025 are currently available.
- The **PRAZ website** (https://www.praz.org.zw/) functions as a central repository for procurement regulatory and institutional information, including codes of ethics and policies, technical guidelines, procurement templates, circulars, standard bidding documents, statutory instruments, tendering procedures, debarment lists, reform initiatives, and Monitoring and Evaluation (M&E) annual reports. It also provides information on training activities and materials from past conferences and workshops. While the institutional structure of the website is in place, content is not consistently updated. For example, the most recent annual report available online dates to 2019, despite subsequent reports having been prepared internally.
- **Social media** primarily serves as a channel to engage with the public and inform on PRAZ-organized events such as conferences, workshops, and training sessions. It is also used to share updates on matters such as fees, supplier registration, and other administrative announcements. The main platforms used are Facebook (~ 12 K followers), WhatsApp channel (~ 1.6 K followers), and LinkedIn (~ 6.7 K followers).
- The **eGP portal** (https://egp.praz.org.zw/) operational since January 2024 provides a bulletin board publishing procurement process related information, including open and closed tenders, award notices, and annual procurement plans for registered procuring entities. Pricing information is disclosed at the award stage only and is not available prior to contract award. The portal currently generates basic reports on registered suppliers, procurement requests, contract management, and procuring entities. However, these reports are limited in analytical depth, and the information produced is not fully harmonised with data published in PRAZ annual reports. Plans are underway to develop a comprehensive data analytics module to strengthen reporting, improve data integration, and enhance transparency.

Community Information Centres: To enhance access to information and provide closer support to the bidder community in understanding procedures and using the eGP system, PRAZ has worked with Zimpost to establish Community Information Centres (CICs) through the physical office network of Zimpost. A total of 191 CICs are operational nationwide, improving outreach and facilitating broader participation in public procurement processes.

Region	Number of CiCs
Bulawayo	12
Harare	21
Manicaland	29
Mashonaland Central	17
Mashonaland East	17
Mashonaland West	22
Masvingo	20
Matebeleland North	15
Matebeleland South	18
Midlands	20
Total	**191**

Source: PRAZ eGP team

Gap analysis

1. **Absence of clear publication guidelines:** The regulatory framework does not clearly define what procurement information should be published online, the timing of publication, or the platforms to be used. This results in fragmented disclosure practices and a lack of harmonisation across information channels.
2. **Limited archiving and accessibility of historical Gazette information:** It is currently difficult to track past procurement processes, assess delays, or evaluate the timeliness and completeness of procurement information published through the Government Gazette. Earlier Government Gazette editions containing procurement information are not systematically archived or easily accessible through the PRAZ website. This limits historical transparency and constrains effective public oversight.
3. **Outdated and inconsistently updated PRAZ website content:** Although the PRAZ website provides a comprehensive structural framework for publishing procurement-related regulatory and performance information, content updates are inconsistent and, in some cases, outdated, reducing the reliability of publicly available information.
   See also 1(a)(d) and 2(a)(b) concerning online availability of comprehensive and up to date collection of legal/regulatory documents.
4. **Limited reporting, visualisation and analytical capacity of the eGP system:** While the relatively new eGP system has expanded public access to procurement information that was previously difficult to obtain, it currently produces only basic reports. These do not support advanced analysis of procurement performance, trends, or efficiency, limiting their value for strategic management and policy oversight.
5. **Lack of data harmonisation across procurement information systems:** Information generated through the eGP portal is not fully aligned with data published in PRAZ annual reports or other official publications. This fragmentation affects data consistency, reliability.

Recommendations

- Clear regulatory guidelines should be established specifying what information must be published online, the timelines for publication, and the platforms to be used.
- Historical Government Gazette selected editions should be systematically digitized and archived on the PRAZ website to improve accessibility and oversight.
- The PRAZ website requires regular updates, including timely publication of annual reports, M&E outputs, and other procurement-related information.
- The eGP system's reporting and analytics capabilities should be strengthened to support effective monitoring of the entire procurement cycle, from planning to execution. Performance monitoring and data analytics reports should be published online and made accessible to all stakeholders, enabling informed decision-making. Additionally, real-time availability and visualisation of procurement data should be implemented to enhance transparency and facilitate downstream analysis by diverse stakeholders.
- Data across platforms must be harmonized through standardized definitions and reporting formats to ensure consistency and comparability. Procurement timelines, delays, and the completeness of information should be routinely monitored to improve oversight and accountability.

See also, 1(a)(d) and 2(a)(b) concerning online availability of comprehensive and up to date collection of legal/regulatory document).

Assessment criterion 7(a)(b):
There is an integrated information system (centralised online portal) that provides up-to-date information and is easily accessible to all interested parties at no cost.

Conclusion: Medium risk gap

Qualitative analysis
With the launch of the new eGP, the objective is to centralise all procurement information through this portal. Currently, information remains inconsistent and fragmented across the eGP, the selected editions of the Government Gazette, social media and the PRAZ website. One example of observed inconsistency is the total

number of registered suppliers for a given year, which differs between figures published on the eGP and those reported in the Government Gazette.

The eGP system tracks the number of supplier accounts created on the platform independently of whether those suppliers have paid their dues and can therefore be legally considered “registered.” Similarly, another example of discrepancy is the number of Registered PEs. The eGP system records the number of Procuring Entities (PEs) enrolled on the platform, although some of those enrolled have not yet been formally authorized by PRAZ to conduct procurement activities. For instance, in 2025, there were 416[72] PEs enrolled on the eGP while the total of 372 are considered “registered” by PRAZ with authorisation to conduct procurement

However, key procurement data on the eGP including open and closed tenders, award notices, and annual procurement plans for registered procuring entities, is now consolidated, freely available, and accessible to all stakeholders. With the eGP increasingly adopted, it is expected that, over time, all procurement information will be available through the portal, making it a one-stop source for public procurement data.

Gap analysis
Although the eGP was launched to centralise procurement information, there is no clear mandate requiring all procuring entities to use the system. As a result, adoption is uneven, and the information on the portal is neither comprehensive nor consistently up to date. Many procurement activities remain unrecorded on the eGP, while some data is still published separately through the selected editions of the Government Gazette (e.g. suppliers list) or the PRAZ website, creating inconsistencies and fragmentation across platforms. In addition, historical procurement data prior to the portal’s implementation has not been captured.

Recommendations
A clear regulatory mandate should be established requiring all procuring entities to use the eGP system for reporting procurement activities. *(See recommendations at 1(j)(a)).*
Efforts should be made to ensure that the portal captures all ongoing procurement processes in a timely and consistent manner, making it a comprehensive and up-to-date source of information.
Historical procurement data should be incorporated into the eGP system to facilitate trend analysis and enhance transparency, thereby improving public access. In addition, procedures should be put in place to harmonise information across the eGP, the selected editions of the Government Gazette, and the PRAZ website, providing stakeholders with a single, reliable, and easily accessible source of procurement information.

Assessment criterion 7(a)(c):
The information system provides for the publication of: *
• procurement plans
• information related to specific procurements, at a minimum, advertisements or notices of procurement opportunities, procurement method, contract awards and contract implementation, including amendments, payments and appeals decisions
• linkages to rules and regulations and other information relevant for promoting competition and transparency.

Conclusion: High risk gap

Qualitative analysis
Before the introduction of the eGP, procuring entities registered with PRAZ submitted their Annual Procurement Plans (APPs) to the Monitoring and Evaluation (M&E) team and provided monthly self-reports using predefined templates to track progress in their procurement activities. With the eGP becoming operational in January 2024, APPs can now be published online, together with advertisements, notices of procurement opportunities, procurement methods, and contract award information. However, information related to contract implementation, contract amendments, appeal decisions, bid opening reports, and bid evaluation reports is not yet published online.

[72] eGP Procuring entities Infographics: https://egp.praz.org.zw/egp-QWdlbmN5R3JhcGhpY3MvcmVnaXN0ZXJfYWdlbmNpZXNfZ3Jvd3Ro

With respect to APP publication, it was observed that some procurement plans were published online by entities whose registration status with PRAZ had not yet been fully approved, as their level of autonomy was still under verification. In 2024, 18% of procuring entities did not publish their APPs online, primarily due to non-registration on the eGP platform. This figure declined to 10% in 2025. All procuring entities that self-report to PRAZ and are registered on the eGP were found to be compliant with APP publication requirements.

With respect to advertisement, the e-bidding module was introduced during eGP rollout Phase 1.1 in January 2024, while the e-evaluation, e-award and contract management modules were only fully implemented in Phase 1.2 in February 2025. As a result, the data currently available on the eGP remains limited.

Prior to the deployment of the Phase 1.2 modules, the low number of published award notices was attributed to the fact that the e-award module had not yet been launched. However, following its introduction, data from February to December 2025 show that only 0.76% of contracts by number and 3.33% by value had their award notices published on the platform. While some progress has been made, this level of publication is unexpectedly low, especially considering that 26,947 invitations to bid were advertised online during the same period. During this period, only 464 tenders were evaluated using the platform, and only 273 contracts were created. This indicates that the adoption of the e-evaluation, e-award, and contract management modules remains slow, and procurement processes are still largely conducted offline beyond the bidding stage.[73]

Furthermore, the total value of invitations to bid being 9% higher than the value of competitive contracts awarded, coupled with the fact that the number of invitations to bid is slightly more than five times the total number of contracts awarded, suggests that while online advertisement of procurement opportunities is increasingly becoming standard practice, a significant number of procurement processes may have failed or been cancelled for various reasons.

Procurement statistics are currently available only through PRAZ annual reports, which are based on quarterly reports prepared by the Monitoring and Evaluation team. These statistics represent aggregated results derived from a selected subset of key performance indicators compiled from monthly self-reported data submitted by procuring entities.

While the publication of procurement plans and awards represents a positive step toward greater transparency and promoting competition, the analytical phase to assess and leverage this data for performance monitoring and decision-making has not yet been implemented.

Quantitative analysis

Quantitative indicators to substantiate assessment of sub-indicator 7(a) Assessment criterion (c):
• procurement plans published (in % of total number of required procurement plans)

Entities registered with PRAZ are required to submit monthly self-reports to the PRAZ Monitoring and Evaluation (M&E) team. However, it has been observed that some entities are now enrolling directly through the eGP system without having obtained authorisation to conduct procurement and, therefore, are not yet registered with PRAZ. Efforts are currently underway to harmonize data between the eGP system and the M&E records. Monitoring continues for:

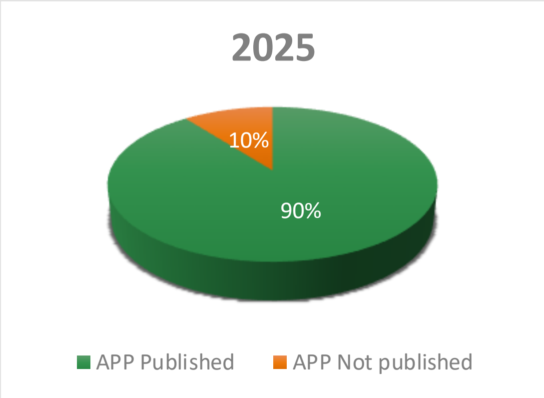
- Entities enrolled on the eGP portal but not submitting self-reports to M&E.
- Entities enrolled online who are also registered with PRAZ and submitting monthly self-reports.

[73] PRAZ Circular OPS/2 of 2025, dated 26 September 2025, notes ongoing concerns about continued practice of conducting procurement proceeding outside the eGP system, especially for RFQ and secondary bidding under Framework Agreements. This circular also notes continued submission of hard copies of Bids and Evaluation Reports submitted for the SPOC process, suggesting that evaluation of tenders is being done manually.

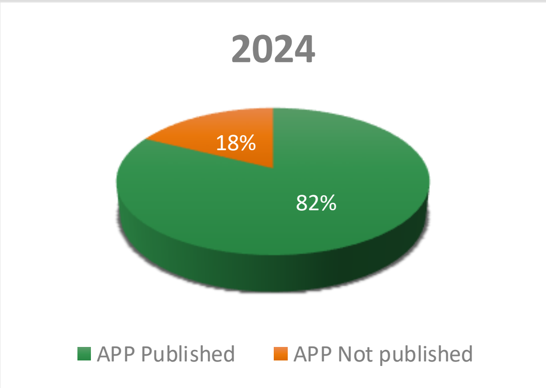
- Entities not enrolled on eGP but that continue to self-report monthly to the M&E team.

This situation reflects an ongoing transition period in the integration of eGP enrolment and PRAZ registration processes.

The required number of annual procurement plans (APPs) is solely based on the total number of procuring entities registered with PRAZ that self-report monthly to the Monitoring and Evaluation team.



Source: PRAZ M&E Reports and eGP



Source: PRAZ M&E Reports and eGP

Before 2024, procurement plans were not published publicly. The Monitoring and Evaluation team, however, received and reviewed these plans submitted by procuring entities. No historical records were maintained for these submissions, limiting the availability of past APP data for analysis.

Key procurement information published along the procurement cycle (in % of total number of contracts) [74]

Since the eGP is still relatively new, the total number of contracts awarded is derived from data submitted by procuring entities through monthly self-reporting to the PRAZ Monitoring and Evaluation team and reflected in the PRAZ annual reports.

The eGP system supports transactions exclusively in United States dollars (USD). While contracts may be paid in ZiG, all amounts are ultimately converted into USD before being recorded in the eGP system. Accordingly, the figures extracted from the annual reports and M&E reporting reflect contract values originally denominated in USD, as well as contracts denominated in ZiG but converted into USD at the applicable exchange rate at the time of reporting. The conversion from ZiG to USD is based on the average exchange rate published by the Reserve Bank of Zimbabwe.

[74] In this section, **"USD Combined"** refers to contracts and expenditure reported in USD and contracts and expenditure originally reported in ZiG that have been converted into United States dollars (USD). The conversion from ZiG to USD is based on the average exchange rate published by the Reserve Bank of Zimbabwe.

All Contracts awarded		
Year	Total number	Total Value (in USD combined)
2025	206,445	2.3B
2024	194,096	8.3B
2023	210,450	5.6B
2022	210,570	2.4B

Source: PRAZ Annual and M&E Reports

Contracts awarded through competitive methods		
Year	Number	Total Value (in USD combined)
2025	5,118	736.5M
2024	3,932	1.5B
2023	5,809	359.7M
2022	5,280	766.1M

Source: PRAZ Annual and M&E Reports

• invitation to bid (in % of total number of contracts)

Note: Comparing the number of contract awards to the total number of processes initiated (invitations to bid) provides a clear measure of procedural efficiency and compliance performance. The data presented in the table below presents a notable discrepancy which reflects the transition from paper-based processes to eGP and declining levels of data as procurement processes progress from advertisement to award.
Before the implementation of the eGP system, it was not possible to accurately quantify the number of invitations to bid published, making it difficult to assess compliance with this requirement under the competitive procurement rules. The eGP now enables tracking of procurement processes from initiation to award. The e-award and contract management module became fully operational in February 2025. eGP has been widely adopted for publication of invitations to bid, as can be seen from the data below for 2024 and 2025. However, data on number of contracts awarded is not comprehensive. It appears that a significant number of processes do not reach completion (contract award stage) and the number of contract award notices published is currently extremely low (see quantitative data below on: *Contract awards (purpose, supplier, value, variations/amendments)*.

Invitations to bid on eGP (competitive methods)				
Year	Total number	% Number	Total Value (in USD)	% Value
2025	26,947	527%	800,068,011.00	109%
2024	12,853	327%	425,683,419.00	28%

Source: eGP

• contract awards (purpose, supplier, value, variations/amendments)

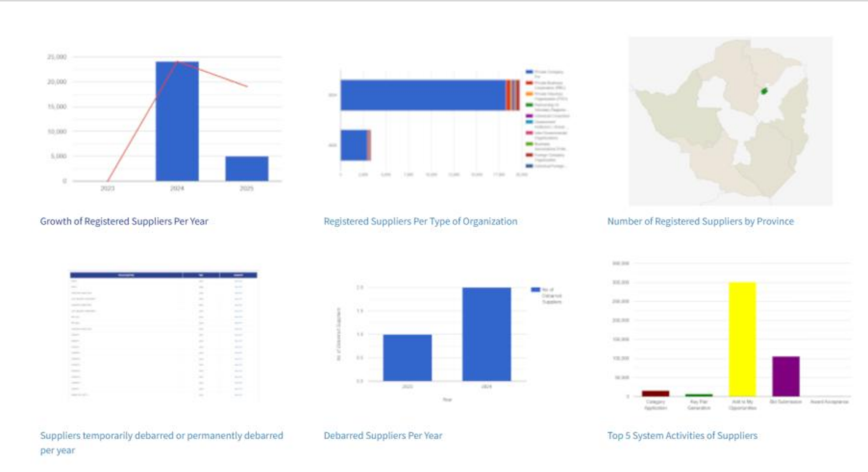
Award notices on eGP				
Year	Total number	% Number	Total Value (in USD)	% Value

2025	1,570	0.760%	77,924,831.99	3.327%
2024	35	0.018%	529,141.53	0.006%

Source: eGP and PRAZ M&E Reports

Information on contracts amendments is not available and is not currently published on the portal.

Basic reports are available on the eGP portal such as suppliers reports. A list of registered suppliers is also publicly available online on the portal.



Source: eGP

• ***details related to contract implementation*** *(milestones, completion and payment)*

⇨ *Data not available*

• ***annual procurement statistics***

The eGP does not currently have comprehensive procurement statistics. However, the M&E team produce quarterly and annual reports. In those, information such as contracts awarded aggregated by procurement methods and category of entities, contracts under ongoing monitoring, participation for processes that went through SPOC etc. is available:

2024 - Contracts awarded by procurement methods and entities category ($ USD)						
Category	**Competitive Tenders**	**Restricted Tenders**	**Direct Procurement**	**RFQ**	**Framework Agreement**	**Total**
Commissions	1,317,785.17	-	3,904,991.51	16,359.17	3,195,081.07	8,434,216.91
Local Authorities	7,602,355.51	168,562.60	5,389,866.94	16,175,658.89	37,345,790.77	66,682,234.70
Ministries	508,484,165.25	1,752,828.26	253,216,575.65	2,111,554.32	483,302,627.46	1,248,867,751.04
Parastatals	72,926,807.16	140,013,987.79	492,138,776.18	4,724,945.70	1,740,725,591.43	2,450,530,108.26
Total	590,331,113.09	141,935,378.65	745,640,210.27	23,028,518.08	2,264,569,090.82	3,774,514,310.91

Source: PRAZ Annual Report 2024, page 39

Bidders' participation for procurement under Special Procurement Oversight Committee (SPOC) threshold.

Bidders' participation			
Year	**Total number**	**Number of SPOC cases**	**Average number of bidders**
2025	4,927	1,254	3.9
2024	3,093	924	3.3
2023	4,475	1,095	4.1
2022	5,101	1,178	4.3

Source: PRAZ Annual and M&E reports

Procurement processes that require a SPOC review are those above a specified threshold and are primarily conducted through competitive methods. For such processes, the average level of bidder participation ranges between three and four bidders per tender.

• appeals decisions posted within the time frames specified in the law (in %).

⇨ *Data not available – Review Panel Decisions are not published. See 13(c)(d).*

Gap analysis

Despite progress in standardising the publication of Annual Procurement Plans through the eGP, the system currently leverages limited data and produces only basic reports on procurement processes. The data currently available and published is insufficient to generate comprehensive procurement statistics and key performance indicators, such as procurement lead times and overall bidder participation. PRAZ quarterly and annual reports therefore remain the primary source of procurement statistics, limiting the role of the eGP as a tool for monitoring and evidence-based decision-making. As a result, procurement data remains constrained in terms of timeliness, completeness, and accuracy, and does not fully capture real-time activities or performance across the entire procurement cycle.

Recommendations

The Monitoring and Evaluation (M&E) monthly data collection templates should be leveraged to revise, expand, and standardise the publicly available list of key performance indicators. In order to support consistent and comprehensive monitoring of procurement performance, requirements for a new data analytics module should be developed by both eGP and M&E team. The new module should then be developed within the eGP to enable end-to-end reporting across the full procurement cycle, from planning to contract completion. The module should integrate information on contract amendments, complaints, appeals, and implementation challenges. Over time, procurement statistics currently available through PRAZ annual reports should be automatically generated directly from eGP data, strengthening accuracy, timeliness, and evidence-based decision-making.

Assessment criterion 7(a)(d):

In support of the concept of open contracting, more comprehensive information is published on the online portal in each phase of the procurement process, including the full set of bidding documents, evaluation reports, full contract documents including technical specification and implementation details (in accordance with legal and regulatory framework).

Conclusion: High risk gap

Qualitative analysis

The information currently published online is limited to Annual Procurement Plans (APPs), tender notices, key documents (bidding documents, evaluation reports, and technical specifications), and award notices. Full contract documents and implementation details are not published. Key documents appear under their respective tender pages. Their availability is inconsistent, with some documents missing entirely, and no standardised naming convention exists, requiring users to manually download and examine each file to identify its type. Data across modules are also not linked; for example, award notices are not directly connected to tender details, associated documents, or awardee information, forcing users to search manually using the tender number or awardee name. Additionally, the legal and regulatory framework provides no guidance on online publication of procurement information or the use of electronic signatures.

Gap analysis
Critical procurement documents are either not publicly available or, when they are, are published inconsistently. Access to these documents is also not user-friendly, and their filing is disorganized, with no standardised naming convention for labelling files. Furthermore, the legal and regulatory framework does not provide clear guidance on the online publication of procurement information or the use of electronic signatures, limiting standardisation, transparency, and efficiency in digital procurement processes.

Recommendations
The legal and regulatory framework should be updated to provide clear guidance on the online publication of all procurement information and the use of electronic signatures. The eGP system should be enhanced to ensure the consistent publication of the full set of procurement documents, including bidding documents, evaluation reports, contract details, technical specifications, and implementation data. Documents should be well-organized and labelled according to standardised conventions to improve transparency, facilitate oversight, and enable automated reporting and analytics.

Assessment criterion 7(a)(e):
Information is published in an open and structured machine-readable format, using identifiers and classifications (open data format).*

Conclusion: High risk gap

Qualitative analysis
The current eGP system primarily stores procurement information in document-based formats, mainly PDFs (e.g. bidding documents and evaluation reports). As this information is unstructured, it limits its use for reporting and analytical purposes. While some information such as annual procurement plans, advertisements, and contract award notices is published, it is not available in an open data format.

Quantitative analysis

** Quantitative indicator to substantiate assessment of sub-indicator 7(a) Assessment criterion (e):*
- Share of procurement information and data published in open data formats (in %).
=> Not available
Source: Centralised online portal.

Gap analysis
The unstructured data limits the ability to aggregate, analyse, and generate reports from the system. Although some information including annual procurement plans, advertisements, and contract award notices is published online, it is not made available in open formats. Data cannot be exported for instance in formats such as CSV, which constrains transparency, interoperability, and effective use of procurement data by stakeholders.

Recommendations
Procurement processes should transition from document-based workflows to structured digital forms in order to enable automated reporting, improve data consistency, and reduce duplication and administrative inefficiencies. The eGP system should capture procurement data in structured, machine-readable formats and publish key information across the procurement cycle in open data formats such as CSV minimally.
A clear implementation plan should be developed to align procurement data publication with the Open Contracting Data Standard (OCDS).

Assessment criterion 7(a)(f):
Responsibility for the management and operation of the system is clearly defined.

Conclusion: No gap

Qualitative analysis

The management and operation of the eGP system falls under PRAZ, with a dedicated eGP team assigned to oversee its implementation and day-to-day operations. It has been noted that the current eGP team is limited in capacity, which constrains its ability to provide effective user support, monitor vendor performance, and drive the timely development and rollout of new system functionalities. PRAZ has started to address those limitations by increasing the number of staff in the eGP team.

Gap analysis

Recommendations

Sub-indicator 7(b)
Use of e-Procurement

Assessment criterion 7(b)(a):
E-procurement is widely used or progressively implemented in the country at all levels of government.*

Conclusion: No gap

Qualitative analysis

The eGP system was officially launched by the Head of State in October 2023. Onboarding of procuring entities (PEs) and registration of suppliers commenced in January 2024 and progressed at a rapid pace. The eGP implementation did not include a pilot phase; instead, it moved directly into a phased rollout between January 2024 and February 2025 (see figure below).

The phased rollout covered the period from Quarter 3 of 2023 to Quarter 2 of 2025.

Phase 1.1, implemented in January 2024, introduced electronic registration of suppliers and procuring entities, as well as the e-bidding module.

Phase 1.2 and 1.3 concurrently completed in February 2025, added e-evaluation, e-award, contract management modules, framework agreements and enhanced reporting functionalities.

Phase 2 was concluded in April 2025 and focused on data analytics, e-catalogues, and e-auctions modules.

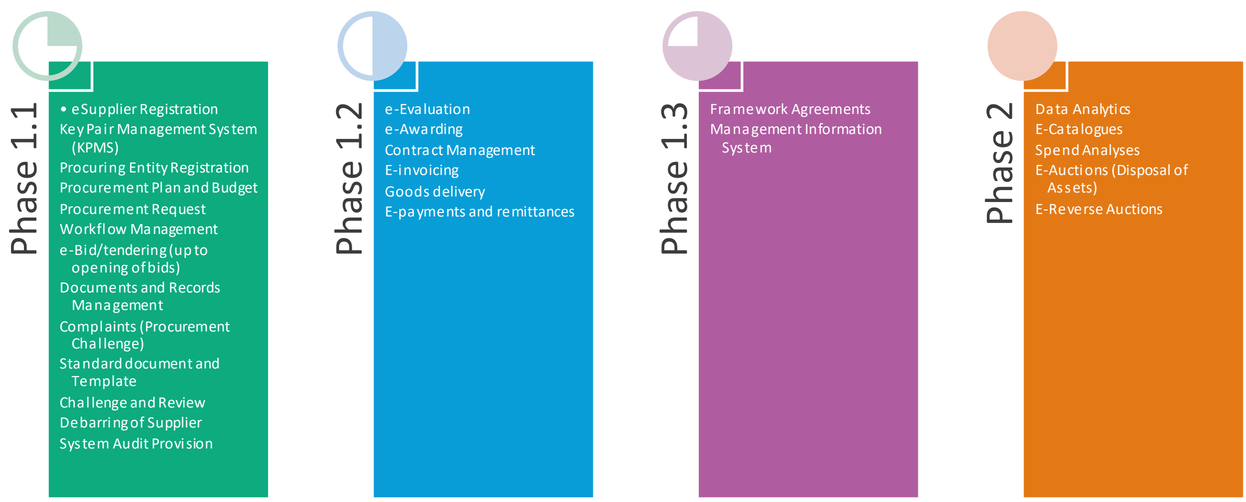


Figure: eGP implementation roll-out

Pillar II. Institutional Framework and Management Capacity

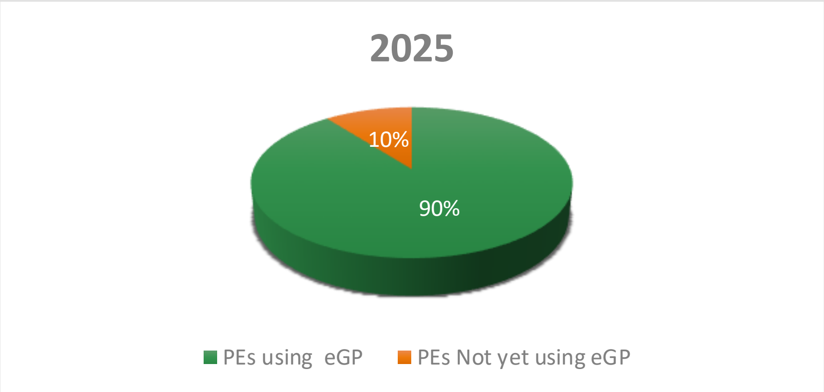
From January 2024, procuring entities were requested to submit their Annual Procurement Plans (APPs) through the eGP system. However, onboarding of PEs is not mandatory and is instead strongly encouraged. As a result, some sectors such as schools, hospitals, and certain state-owned enterprises (SOEs) remain outside the system. At the same time, it was observed that some entities that were not previously registered through the manual PRAZ system enrolled directly through the eGP, indicating growing interest and acceptance of the new platform. The status of some of the online enrolled entities is still under review by PRAZ, particularly with respect to their level of autonomy to clarify whether they are procuring entities in their own right as they do not yet submit monthly self-reports to the PRAZ Monitoring and Evaluation team in the same manner as other registered procuring entities. This reflects an ongoing transition in the registration, verification, and reporting framework.

With the utilisation of the e-Auctions module limited by the legal requirement that a licensed auctioneer must conduct the disposal process, the eGP system introduced, in January 2026, an “Asset Disposal” functionality. This feature enables entities to record and track the disposal of their assets directly within the eGP system. This feature allows entities to record and track the disposal of their assets directly within the eGP system, reflecting PRAZ’s efforts to adapt the platform and encourage wider adoption of the module.

Quantitative analysis
** Quantitative indicators to substantiate assessment of sub-indicator 7(b) Assessment criterion (a):*

- ***share of entities using e-Procurement (in % of the total number of entities)***

The total number of entities refers to those that submit monthly self-reporting data to the PRAZ Monitoring and Evaluation team.



Source: PRAZ M&E Reports and eGP

Source: PRAZ M&E Reports and eGP

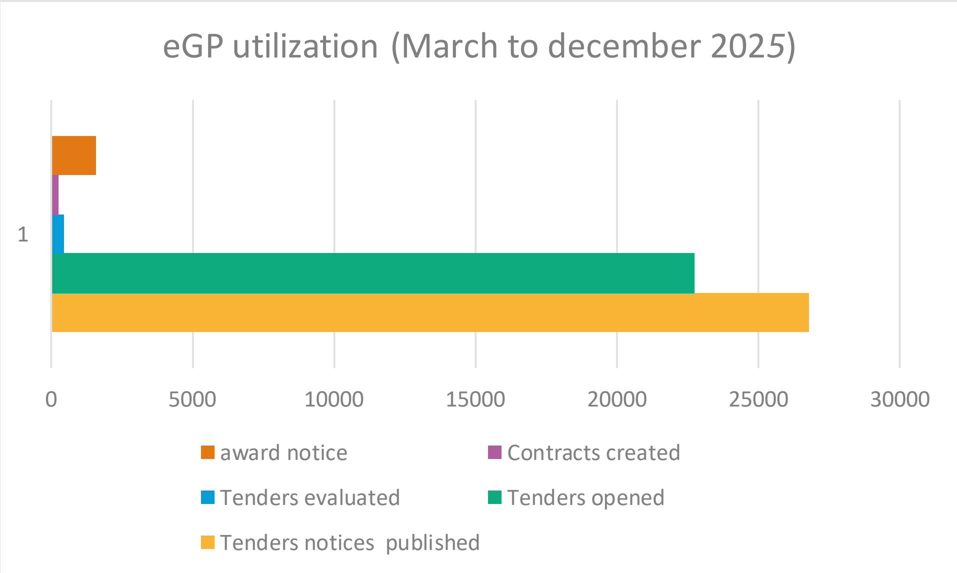
*In **2024**, a total of **357** procuring entities were registered with PRAZ and submitted monthly self-reported data to the Monitoring and Evaluation team, of which **294** used the eGP system. In **2025**, **372** procuring entities were registered with PRAZ and self-reporting, and **333** of these used the eGP.*
*When combining procuring entities that submit monthly self-reported data and are registered on the eGP with additional entities that are registered on the eGP but do not yet self-report, the total number of entities registered on the eGP amounts to **404 in 2024** and **416 in 2025**. This reflects the transitional phase of eGP adoption and ongoing efforts to harmonise registration and reporting practices.*

- ***number of e-Procurement procedures in % of total number of procedures***

Information not available**.**

- ***value of e-Procurement procedures in % of total value of procedures***

Information not available**.**



Source: eGP

With the Phase 1.2 modules now available, some activity has begun, and operations are gradually being conducted through the eGP system, allowing the procurement process to be managed fully from planning through to award. The usage of the e-evaluation, e-award and contract management modules remain very low compared to the e-bidding module. Procurement processes are still largely conducted offline beyond the bidding stage, with PRAZ aware of this issue and actively working on remediation actions. In response, a PRAZ Circular OPS/2 of 2025, dated 26 September 2025, was issued to convey new guidelines to Procurement Entities (PEs). The circular restricts the use of manual processes, specifying, for example, that no hard copies of evaluation documents will be accepted as submissions to the SPOC.

Gap analysis.

Recommendations

Assessment criterion 7(b)(b):
Government officials have the capacity to plan, develop and manage e-Procurement systems.

Conclusion: High risk gap

Qualitative analysis

Pillar II. Institutional Framework and Management Capacity

The National Development Strategy 2 (NDS-2) 2026–2030 emphasizes the digitisation of public procurement through the digital transformation of procurement processes. Under NDS-2, public procurement will be strengthened by the continued use of the electronic Government Procurement (eGP) system, enabling more efficient submission and processing of suppliers' tenders. This initiative will be complemented by ongoing awareness and capacity-building efforts targeting both public procurement practitioners and the supplier community, with the aim of supporting faster decision-making by PRAZ and reducing overall cost of procurement processes.

The eGP system in use follows a Commercial Off-The-Shelf (COTS) model, meaning it is a pre-developed solution configured to meet PRAZ requirements rather than a fully custom-built system. While this approach allows for faster deployment and lower initial development costs, it also creates a degree of dependency on the vendor for system customisation, upgrades, and development of advanced functionality. End-users have reported several performance issues during peak hours, as well as user experience challenges such as difficult navigation, lack of notifications, and other concerns, which are still pending resolution. Communication about planned eGP enhancements is inconsistent. Users are not reliably informed about system maintenance, new feature deployments, or updates to the eGP.

PRAZ has initiated capacity-building activities for the eGP system. These activities are significantly constrained by systemic weaknesses in staffing, training, and user support. The eGP unit is small, comprising only five permanent staff and five interns, which is insufficient to manage a nationwide system, provide user support, provide end-users training, oversee the vendor, get in-depth training and knowledge transfer from the vendor and develop new functionalities simultaneously.

Furthermore, although a staff retention policy exists, its impact on highly skilled technical staff is limited, as a challenging work environment focuses on urgent tasks rather than strategic or innovative work.

PRAZ relies heavily on consultants from the eGP vendor for operational and technical support, limiting its ability to independently maintain and enhance the platform. As a result, PRAZ's capacity to fully own, maintain, and enhance the eGP system remains severely constrained.

It has been observed that staffing issues are being addressed through the expansion of the eGP team by the planned augmentation of its workforce to 11 permanent staff members in 2026.

A technical assessment of the Zimbabwe Electronic Government Procurement (eGP) System conducted in August 2025 by the World Bank corroborated these observations and further highlighted structural and governance limitations affecting system performance, interoperability, cybersecurity, data analytics, and transparency. The World Bank assessment identified gaps in system integration, automation, data analytics, reporting capabilities, and operational risks linked to vendor dependency.

Gap analysis

PRAZ's capacity to manage and sustain the eGP system is limited by a heavy reliance on vendor consultants. Vendor-led training and knowledge transfer are currently inadequate to build sufficient in-house expertise. System performance and user experience issues remain unresolved, communication on eGP improvements is inconsistent, and staff retention policies are insufficient to retain highly skilled technical personnel.

Recommendations

With the expansion of the eGP team, PRAZ should continue to focus on strengthening in-house technical expertise and reducing reliance on vendor consultants. Vendor-led training and knowledge transfer should be enhanced to cover advanced technical areas, enabling PRAZ to fully own, maintain, and improve the eGP system. System performance and user experience issues should be addressed, while communication on planned and ongoing eGP improvements should be strengthened through a publicly available roadmap, regular newsletters, release notes, and user engagement forums.

Furthermore, the three-phase roadmap with the strategic options proposed by the World Bank assessment report should be leveraged by PRAZ to address these weaknesses, combining short-term stabilisation measures with medium- and long-term reforms aimed at enhancing sustainability, transparency, and technological resilience.

Assessment criterion 7(b)(c):
Procurement staff is adequately skilled to reliably and efficiently use e-Procurement systems.

Conclusion: High risk gap

Qualitative analysis
User training and support for procuring entities (PEs) and suppliers under the eGP system remain limited and unsustainable. PRAZ has relied on ad-hoc initiatives such as workshops, training videos, and WhatsApp groups, which provide some guidance but are reactive and cannot replace a structured, scalable training program. Trainings are not tailored to specific sub-user groups, resulting in large, inefficient sessions for example, the latest bidder training involved 595 participants over two days in Harare. *(See 8(a)(a) for analysis, Gap and Recommendations for more tailored training, including for eGP)*
User support mainly depends on a single VOIP line and a few cell phone numbers, which are easily overwhelmed and place significant pressure on the small central eGP team. Consequently, external users may experience delays, inconsistent guidance, and limited ability to fully engage with the system. PRAZ has recently acquired an internal ticketing system, currently used by the helpdesk team, with plans to extend it to the bidding community soon.

Gap analysis
The absence of a Training-of-Trainers (ToT) program prevents knowledge from being cascaded within procuring entities, creating a bottleneck in which the central eGP team remains the sole source of expertise. Current training initiatives are largely reactive and ad-hoc, lacking structure and scalability, which limits their effectiveness in supporting nationwide adoption of the eGP system. Current user support model is unstainable, to manage external queries efficiently, placing additional pressure on the small central team and increasing the risk of stakeholder dissatisfaction.

Recommendations
PRAZ should implement a structured and scalable training program, including a Training-of-Trainers (ToT) model, to develop in-house capacity within procuring entities and reduce reliance on the central eGP team. User support should be strengthened through the monitoring of the response time through the newly acquired helpdesk ticketing system to ensure efficiently handling of queries and issues from both PEs and suppliers. Complementary tailored training initiatives, such as workshops, videos, and online forums, should be maintained but integrated within this structured framework to ensure consistent, nationwide support and sustainable adoption of the eGP system.

Assessment criterion 7(b)(d):
Suppliers (including micro, small and medium-sized enterprises) participate in a public procurement market increasingly dominated by digital technology.*

Conclusion: Low risk gap

Qualitative analysis
Since January 2024, suppliers have been able to register directly on the eGP, and the e-Bidding module is fully functional, supporting the entire process from bid submission to opening and evaluation. This represents a significant step toward digitalizing procurement and improving access for suppliers. The system records, where applicable, the category of each supplier as Small/Medium Enterprise (SME), Micro Enterprise (ME), or NMSME (Other Local Entity). The usage statistics from the e-Bidding module are not computed or exported, limiting the ability to analyse bidder participation or overall system performance.

Quantitative analysis

** Quantitative indicators to substantiate assessment of sub-indicator 7(b) Assessment criterion (d):*
- bids submitted online (in %)

Number of bids submitted online	
Year	**Total Number**
2025	195,406
2024	67,004

Source: eGP

The total number of bids submitted, including both online and offline submissions, is currently unavailable.

- bids submitted online by micro, small and medium-sized enterprises (in %)
Information not available

Gap analysis
The eGP system does not track bidders' participation and supplier company size, preventing segmentation and analysis of supplier participation. Although the e-Bidding module is operational, usage statistics are not automatically generated or exportable, limiting performance monitoring, reporting, and evidence-based decision-making.

Recommendations
The eGP system should be enhanced to capture bidder participation data and supplier company size in a structured and mandatory manner, enabling segmentation and analysis of supplier participation. In addition, the e-Bidding module should automatically generate and allow export of statistics, supporting effective performance monitoring, reporting, and evidence-based decision-making.
See also, 10(b)(a) assessment of private sector market.

Assessment criterion 7(b)(e):
If e-Procurement has not yet been introduced, the government has adopted an e-Procurement roadmap based on an e-Procurement readiness assessment.

Conclusion: Not applicable

Qualitative analysis
Not applicable, as the eGP was launched in October 2023 and is being rolled out in phases, as described under Indicator 7(b)(a).

Gap analysis

Recommendations

Sub-indicator 7(c)
Strategies to manage procurement data

Assessment criterion 7(c)(a):
A system is in operation for collecting data on the procurement of goods, works and services, including consulting services, supported by e-Procurement or other information technology.

Conclusion: High risk gap

Qualitative analysis
The current eGP system collects procurement data but relies heavily on text fields with minimal data validation, such as in the entry of Annual Procurement Plan (APP) information. The system does not auto-populate data across stages, requiring redundant manual data entry. Furthermore, the platform depends extensively on the manual upload and verification of documents. Critical compliance items such as National Social Security Authority (NSSA)

certificates, tax clearance certificates, and dealership authorisations must be scanned and uploaded by users, with no automated validation of the submitted information. This limits data accuracy, increases administrative burden, and reduces the efficiency of the procurement process. There is no comprehensive data analytics module yet. The requirements for the initial module were minimal, which resulted in very limited capabilities.

Gap analysis
The eGP system relies heavily on manual text entry and document uploads, creating redundancy and increasing the risk of errors. Lack of auto-population and automated validation limits efficiency, accuracy, and timely analysis. In addition, the system does not include a comprehensive data analytics tool to track procurement performance, spend distribution, or indicators across different stages, preventing decision-makers at both procuring entity and PRAZ levels from obtaining the insights needed to make informed decisions and recalibrate performance and policies.

Recommendations
The eGP system should be enhanced to support structured data entry with automated validation checks for critical compliance information, and data entered at one stage should be auto-populated to subsequent stages to reduce redundancy and minimize errors. Procurement processes should be transformed from document-driven workflows to fully structured digital forms, enabling automated report generation and more efficient processing. Integration with external systems, such as the Zimbabwe Revenue Authority (ZIMRA), could automate the verification of compliance documents, improving efficiency, accuracy, and reducing the risk of fraud. A comprehensive data analytics module should be developed
See also recommendation for Indicator 7(a)(c)).

Assessment criterion 7(c)(b):
The system manages data for the entire procurement process and allows for analysis of trends, levels of participation, efficiency and economy of procurement and compliance with requirements.

Conclusion: High risk gap

Qualitative analysis
Currently, the eGP system does not generate meaningful or reliable statistics. Though some basic reports are available online, the only reliable reporting comes from the Monitoring and Evaluation team, which relies on well-structured templates aggregating self-reported data from procuring entities.

Gap analysis
The eGP system currently lacks a comprehensive data analytics module, and reporting capabilities are limited.

Recommendations
The eGP system should be upgraded to incorporate data-driven principles throughout the procurement cycle, enabling comprehensive analytics to track trends, participation, efficiency, economy, and compliance. A dedicated analytics module should generate timely and accurate statistics, reducing reliance on aggregated self-reported data from procuring entities. Interoperability with the PFM system should be implemented to enable commitment budget checks and provide actionable insights to both PRAZ and procuring entities. These enhancements would support evidence-based decision-making, strengthen oversight, and improve overall procurement performance.
See also, recommendation for Indicator 7(a)(c).

Assessment criterion 7(c)(c):
The reliability of the information is high (verified by audits).

Conclusion: High risk gap

Qualitative analysis

The adequacy and accuracy of data entered into the eGP system remain the responsibility of the procuring entities. The system does include audit functionalities, featuring a comprehensive audit trail that can support both internal and external oversight. Internally, this functionality allows procuring entities to monitor compliance and control processes. Externally, it has the potential to facilitate independent audits by the Office of the Auditor General or other third-parties, promoting transparency and public accountability. A third-party audit of the eGP is currently being conducted to assess system limitations, performance, stability, security, and technical debt.

Gap analysis
The responsibility for data accuracy lies with the procuring entities, creating a risk of inaccurate, inconsistent or incomplete data entry. Although the eGP includes audit trails, these features are underutilised for both internal and external audits.

Recommendations
PRAZ should establish formal procedures to ensure data quality, including verification mechanisms and guidance for procuring entities. The audit functionality should be actively leveraged and made user-friendly for both internal audit and compliance monitoring and external oversight by the Office of the Auditor General.

Assessment criterion 7(c)(d):
Analysis of information is routinely carried out, published and fed back into the system. *

Conclusion: High risk gap

Qualitative analysis
Currently, analysis of procurement information is conducted by the Monitoring and Evaluation (M&E) team based on self-reported data from procuring entities. The eGP system is not yet fully leveraged for analytics, as it lacks a dedicated data analytics module. However, with the planned development of such a module and the experience of the M&E team, a structured process should be established to continuously analyse information from both sources. The ultimate goal is for the eGP to become the sole source of procurement information once the transition is complete. This process will not only improve insights for monitoring and reporting but also support enhancements to the eGP system itself, procurement processes, policies, and overall decision-making.

Furthermore, with public procurement rising from USD 2.4 billion (6% of GDP) in 2022 to USD 8.3 billion (20% of GDP) in 2024, and consistently exceeding reported government expenditure, this signals the absence of a clear feedback loop where insights are monitored and used to continuously strengthen the system. This trend highlights the growing importance of public procurement and underscores the need for effective monitoring, transparency, and alignment with budget reporting.

Quantitative analysis

** Quantitative indicators to substantiate assessment of sub-indicator 7(c) Assessment criterion (d):* [75]

• total number and value of contracts
Refer also to criterion 7(a)(c)

Year	Total number	Total Value (in USD combined)
2025	206,445	2.3B
2024	194,096	8.3B

[75] In this section, **"USD Combined"** refers to contracts and expenditure reported in USD and contracts and expenditure originally reported in ZiG that have been converted into United States dollars (USD). The conversion from ZiG to USD is based on the average exchange rate published by the Reserve Bank of Zimbabwe.

2023	210,450	5.6B
2022	210,570	2.4B

Source: PRAZ M&E Reports

Between 2022 and 2024, public procurement values exhibited a consistent upward trajectory, largely driven by construction and major infrastructure projects. In 2025, however, procurement fell sharply by approximately USD 5 billion, reflecting a slowdown in these key projects. This decline signals a potential moderation in economic activity.

• public procurement as a share of government expenditure and as share of GDP

Year	**Total Annual Procurement value (in USD combined)**	*Government expenditure (in USD combined) (Ministries & Gvt Departments*	*Government expenditure (in USD combined) (Local Authorities)*	**Total Government expenditure (in USD combined)**	**Share %**
2025	**2.3B**	853.7M	133.4M	**987.1M**	237%
2024	**8.3B**	2.1B	578.8M	**2.7B**	311%
2023	**5.6B**	764.2M	377.9M	**1.1B**	494%
2022	**2.4B**	1.5B	63.3M	**1.5B**	157%

Source: PRAZ M&E

The figures include contracts and expenditures reported in United States dollars (USD), as well as those initially denominated in ZiG and later converted to USD. The reported total government expenditure is lower than the total annual procurement value. This discrepancy can be partly explained by the scope of reporting: the total government expenditure reflects only the central government and its departments, whereas the public procurement total encompasses the central government, local authorities, commissions, and parastatal entities; the latter being the largest group of entities and largely self-funded.
This discrepancy may also indicate potential issues in the reporting or classification of government expenditure data, including off-budget spending, cost overruns, and mismatches between committed and actual cash flows.

See analysis at 4(a) flagging unreliability of public financial management data.

Year	Total Annual Procurement value in USD Combined	GDP[76] (USD)	Share %
2024	8.3B	41.54B	20%
2023	5.6B	35.87B	16%
2022	2.4B	40.76B	6%

Source: PRAZ M&E and World bank database

• total value of contracts awarded through competitive methods in the most recent fiscal year.
Refer also to criterion 7(a)(c)

[76] World Bank Zimbabwe GDP 2022 -2024
https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?end=2024&locations=ZW&start=2022

Contracts awarded through competitive methods		
Year	**Number**	**Total Value (in USD combined)**
2025	5,118	736.5M
2024	3,932	1.5B
2023	5,809	359.7M
2022	5,280	766.1M

Source: PRAZ Annual and M&E Reports

Gap analysis

Analysis currently relies almost entirely on self-reported data from procuring entities, limiting timeliness, reliability, and comprehensiveness. The eGP system is not yet leveraged for data analytics, restricting the ability to extract actionable insights directly from the system. No formal process exists to integrate data from self-reporting and the eGP for continuous monitoring and system improvement during the transition period.

Procurement consistently exceeds reported government expenditure, indicating potential reporting or cash flow issues. Rapid growth of public procurement as a share of GDP has not been matched by enhanced monitoring, highlighting the need for stronger oversight and interoperability between eGP and a fully functioning PFMS. There is no structured feedback loop to use insights for improving processes or the system.

Recommendations

Procurement records should be regularly reconciled with government expenditure data, with interoperability with a fully functioning PFMS, to address discrepancies, including potential off-budget spending and differences between commitments and actual cash flows. A structured process should be established to systematically analyse, harmonise, and continuously improve the quality of procurement information derived from both self-reporting mechanisms and the eGP system during the transition period. This approach should recognise that the outputs of this process will inform the requirements for the analytics module to be developed. Once implemented, this module will institutionalise the function and further strengthen monitoring and oversight capabilities. Leveraging these insights, together with the establishment of a clear feedback loop, will support ongoing improvements to the eGP system, enhance procurement processes, refine policies, and promote evidence-based decision-making.

Indicator 8. The public procurement system has a strong capacity to develop and improve

Sub-indicator 8(a)
Training, advice and assistance
There are systems in place that provide for:

Assessment criterion 8(a)(a):
Substantive permanent training programmes of suitable quality and content for the needs of the system.

Conclusion: Medium risk gap

Qualitative analysis

PRAZ delivers significant amounts of training and capacity building for procuring entities, including online learning, tailor-made paid training on request from institutions, regular capacity building /training events (online and in person), conferences and a procurement bootcamps for students. Feedback from procuring entities points to the need for to tailor the more general capacity building/training events to better meet the needs of participants to ensure that the content is relevant and useful.

Tertiary educational institutions and specialist organisations also provide relevant education and training. Professional bodies and training organisations including the Zimbabwe Institute of Procurement and Supply,[77] and CIPS[78] are also active in Zimbabwe.

PRAZ led initiatives:

Substantive permanent training courses: PRAZ currently offers two substantive permanent training programmes aimed at accounting officers, PMUs and evaluation committee members: a three-day course on Public Procurement Law and a one-day course on eGP.

In 2024, with the introduction of eGP, 1131 participants were involved in eGP training with the target audience being all procuring entities.

Online e-learning: PRAZ provides free e-learning with self-paced learning modules and online assessment with certification on successful completion. The Program, commissioned jointly by PRAZ and the World Bank aims to build capacities of public sector officials and other stakeholders including institutional stakeholders, the private sector and civil society organisations. There are currently two courses which can be accessed from the e-learning portal at: https://elearning.praz.org.zw/

- **Sensitisation:** comprising 3 modules covering: Law Sensitisation; Bidder Sensitisation, and Standard Bidding Documents. According to the elearning website, it takes approximately 7 hours to complete the course
- **Elementary Certification Training:** comprising 6 units covering: Principles of Procurement; Procurement Planning; Bidding Process; Bidding Documents and Procedures for Goods and Works; Bidding Documents and Procedures for Consulting Services; Contract Award, Challenges and Management. According to the elearning website, it takes approximately 3 hours to complete the course.

The eGP system also provides e-learning on how to use the eGP system, using video-based learning. This is aimed at both procuring entities and suppliers. The six eGP e-learning modules can be accessed through the eGP e-learning page.

Tailor-made training: PRAZ also delivers tailor made training at the request of institutions which is paid for by institutions. In 2024, PRAZ delivered training to 1,438 participants with the target group being accounting officers, PMUs and evaluation committees. In the period January to September 2025, PRAZ delivered 52 in-house training events. Where PRAZ lacks in-house expertise, for example sector specific knowledge, it will use external expert trainer to deliver the relevant training.[79]

Public Procurement Bootcamp: In 2025, 275 students attended the Students Bootcamp held at Chinhoyi University of Technology (CUT), delivered by 14 speakers. The Bootcamp is an annual event and is targeted at 4th year students in tertiary institutions that offer undergraduate degrees in purchasing and supply chain management. The aim of the event is to prepare students for employment in public sector procurement. Students attending came from CUT (160 students), Lupane State (56 students) and Bindura University of Science Education (BUSE) (59 students).

Regular capacity building conferences/events: PRAZ provides/hosts regular capacity building events/conferences which include a training element. Information of events/conferences in 2025 is shown below:

2025		
Conference title	**Target group**	**Duration**
Women in procurement Breakfast meeting	Women in procurement (public and private sector)	2 events
Public procurement and corporate governance** for Local Authorities	Local Authorities policy makers	2 days
Public procurement 4th Annual Symposium	PEs	2 days
eGP Summit	PEs	2 days
Public Procurement research colloquium	Academia and PEs	I days

[77] https://www.zips.org.zw/

[78] https://www.cips.org/events-networking/branches/zimbabwe

[79] Information on tailor-made training shared by PRAZ in discussion with MAPS Assessment Team, October/November 2025.

African Public Procurement Network - PRAZ hosted the event	Africa Public Procurement members	3 days

** In 2024 PRAZ delivered sector specific events on corporate governance for policy makers: Public procurement and corporate governance for parastatals - a 2-day course mainly aimed at board members & Public Procurement Corporate Governance Conference for Ministries and University Councils; a 2-day course aimed at ministries and university policy makers.
Some of the above events are annual events which have been adapted over the years to respond to user needs. For example, the women in procurement events have been expanded to cover practitioners as well as women in business and a larger event is planned for 2026. The annual Symposium programme has developed to include cover technical issues for more junior officials in addition to the original policy focused event.

Feedback on PRAZ training: The MAPS Assessment team asked representatives of PEs, CSOs and the private sector who had attended PRAZ training how relevant and useful they found the training and how the training could be improved.
General feedback from PEs was that paid for tailor made training is useful and relevant. Whilst acknowledging the need for wide coverage, feedback on other training offered by PRAZ was that it is not always useful or relevant. A common comment was that the sheer numbers participating in a training session (examples mentioned were Zoom training for 200 plus, eGP training for 400) mean that the training is by necessity one-size-fits-all and so direct relevance to all those present will be limited. PEs suggested that the general training could be much improved by tailoring it to meet specific groups, to meet different needs and experience. For example, training should be tailored to reflect: the level of seniority of the procurement professionals invited; the type of PE, or: the needs of specific sectors. PEs also commented that training is often too theoretical and does not sufficiently address practical issues or scenarios which PEs face. In relation to eGP training, PEs commented that additional training would be useful to address frequently asked questions and issues which they have encountered whilst working with the eGP system. Training of Trainers to allow for effective cascading of training was also mentioned.
See analyses, gaps and Recommendations at Indicator 9 identifying specific training needs on particular stages in the planning and procurement process as well as contract management and records management.

See analysis, gap and Recommendations at 10(a)(b) on Capacity Building and Training for the Private Sector, including survey results, and 11(a) & (c) on Capacity Building and Training for Civil Society Organisations.

Southern African Public Procurement Training Academy (SAPPTA) based at the Zimbabwe Institute of Public Administration and Management (ZIPAM): In 2024 PRAZ established SAPPTA (established by PRAZ and reporting to the PRAZ Board) to provide training and resources across the region and to serve as a hub for knowledge sharing and capacity building. Supply chain masterclasses are currently offered, and a wide range of procurement related courses are proposed to be delivered by a pool of facilitators. Courses will be delivered on a cost recovery basis. (see also analysis at 8(b) on certification programme.)

Other providers including Private sector provision: Tertiary educational institutions and specialist organisations also provide relevant education and training. Several universities in Zimbabwe offer undergraduate courses in supply chain management and/or public sector management which may include public procurement modules. For example, Lupane University's BSc in Supply Chain Management includes a mandatory module on public procurement, ethics and code of conduct for public officials. University students on relevant course may apply to the public sector for secondment, including within PMUs, as part of their university course. Postgraduate courses of relevance to public procurement, such as supply chain management are also available for various institutions. For example, the University of Zimbabwe offers a special MSc honours degree for students with relevant business-related experience or level 6 CIPS with modules on sustainable public procurement, policy and contract management.
Zimbabwe Institute of Public Administration and Management (a parastatal) offers public sector management courses including procurement management.

Professional bodies and training organisations including the Zimbabwe Institute of Procurement and Supply,[80] and CIPS[81] are also active in Zimbabwe.

Gap analysis
Whilst tailored training delivered to individual PEs is regarded as relevant and useful, the general training events provided by PRAZ are not sufficiently tailored to meet the diverse needs of the wide range of participants.

Recommendations
Consider additional measures to engage with the procurement stakeholder community in order to discuss and identify needs and deliver training which is both meaningful and useful for participants. Consider splitting more general training (including eGP training) to deliver that training to smaller groups in a more tailored manner to reflect, for example: the level of seniority of the procurement professionals invited; the type of PE, or: the needs of specific sectors. Further Training of Trainers should be considered to allow for effective cascading of training was also mentioned.
See analyses, gaps and Recommendations at Indicator 7 on eGP training and Indicator 9 identifying specific training needs on particular stages in the planning and procurement process as well as contract management and records management.

Assessment criterion 8(a)(b):
Routine evaluation and periodic adjustment of training programmes based on feedback and need.

Conclusion: No gap

Qualitative analysis
PRAZ is ISO certified and has standard operating procedures for seeking feedback on and evaluation of training delivered and outcome. Routine evaluation is thus part of the training programme process cycle undertaken by the Capacity Building Directorate of PRAZ. Feedback is reviewed and used to adjust training materials.
In addition, the PRAZ Monitoring and Evaluation team ask for feedback on training needs of PMUs and the Capacity Building Directorate use this feedback to identify training needs. SPOC also identify training needs as a result of their review and approval process. This resulted in, for example, PRAZ partnering with the CGU to provide input for training on procurement governance issues.
See analysis and recommendations at 8(a)(a) on further tailoring of PE training.

Gap analysis

Recommendations

Assessment criterion 8(a)(c):
Advisory service or help desk function to resolve questions by procuring entities, suppliers and the public.

Conclusion: Medium risk gap

Qualitative analysis
There is no publicly advertised advisory service or help desk function provided by PRAZ to resolve questions raised by procuring entities, suppliers and the public on the application and interpretation of public procurement rules and policy. Other than technical guidelines, circulars and instructions (see below) there are no online user-friendly resources, such as answers to frequently asked questions (FAQ) on the PRAZ website.
In practice, PRAZ provides personalised support to procuring entities by initiating contact as well as responding to matters arising in monitoring processes, through phone calls, e-mails and walk-in contacts with clients/procuring entities.[82]

[80] https://www.zips.org.zw/
[81] https://www.cips.org/events-networking/branches/zimbabwe
[82] PRAZ Quarterly Stakeholder Report Q4 2024

The Operations Division of PRAZ issues technical guidelines, circulars and instructions regarding the operation and implementation of the PPDPAA.
PRAZ offers an eGP support/help desk function and there is an FAQ page on the eGP System web pages (*see analysis at 7(b)).*

Gap analysis
There is no publicly advertised advisory service or help desk function provided by PRAZ to resolve questions raised by procuring entities, suppliers and the public on the application and interpretation of public procurement rules and policy.

Recommendations
Engage with stakeholders – suppliers, public and procuring entities - to explore what would be the most welcome and effective measures for each of those stakeholder groups to provide relevant information, support and quick responses to resolve questions and enhance practical understanding of the public procurement system. Implement measures with provision for regular review to gauge their effectiveness.

Assessment criterion 8(a)(d):
A strategy well-integrated with other measures for developing the capacity of key actors involved in public procurement.

Conclusion: No gap

Qualitative analysis
PRAZ Capacity Building Directorate has a strategy for developing the capacity of key actors involved in public procurement which is subject to ongoing review. PRAZ's Procurement Capacity Building identifies strategic areas for capacity building on an annual basis with linked KPIs, measurements, annual target/benchmark, reporting and provides for assessment of actual performance against those measures.

During 2020/2021 PRAZ was receiving feedback that training provided was not in tune with stakeholder expectations and needs, particularly in the context of the challenges presented by macro-fiscal instability. PRAZ wrote to all accounting officers requesting information on specific training needs to identify immediate interventions required. PRAZ commissioned a procurement training needs analysis, with the main activities of the needs analysis conducted in the period August 2022 to December 2022. The Procurement Training Needs Analysis Report 2023 (TNA Report)[83] sets out both short- and long-term recommendations: section 5.1 lists short term recommendations on general resource requirements and training needs of public procurement practitioners in PEs. There is brief reference to training needs of the bidding community. Long term recommendations set out in section 5.2 are addressed to academic institutions, PEs and PRAZ. The TNA Report also references a strategic implementation plan and training plan.

Gap analysis

Recommendations

Sub-indicator 8(b)
Recognition of procurement as a profession
The country's public service recognises procurement as a profession:

Assessment criterion 8(b)(a):
Procurement is recognised as a specific function, with procurement positions defined at different professional levels, and job descriptions and the requisite qualifications and competencies specified.

Conclusion: No gap

Qualitative analysis

[83] Training Needs Analysis, Final Report 2023. Researcher: Central Procurement Consultants

Procurement professionals within MDAs are public servants appointed by the Public Service Commission. Section 199 of the Constitution provides for a single Public Service to implement the policies of the Executive branch of the Government, to assist it in the administration of Zimbabwe and to deliver public services to the people. The Public Service Act (Ch. 16:04) establishes the Public Service Commission (PSC) whose functions include appointment of persons to the public service, their examination and promotion as well as complaints and disciplinary matters. Within the Public Service, procurement is recognized as a distinct function with procurement positions defined at different levels, from entry level procurement officer to manager and director level and with job descriptions which specify requisite qualifications and competencies.[84] Procurement professionals within local authorities, parastatals/SOEs are employed by those organisations and are covered by relevant employment related legislation including the Labour Act (Ch.28:01). All PEs are required to have a Procurement Management Unit (PMU) with defined roles and responsibilities within the PMU. PRAZ assesses the staffing of PMUs as part of the process for PE Authorisation to conduct procurement. PRAZ document 2025 Requirements for Authorisation to Conduct Procurement and Procurement Management Units" includes requirements at (b) for information with respect to assignment of responsibilities within in the PE including: organogram; structure of PMU; procurement review mechanism; job descriptions of procurement staff; PMU officers' detailed CV, certified copies of qualifications, and certified copy of procurement staff certificate of practice
Gap analysis
Recommendations
Assessment criterion 8(b)(b): Appointments and promotion are competitive and based on qualifications and professional certification.
Conclusion: No gap
Qualitative analysis Section 194 of the Constitution provides that public administration in all tiers of government, including institutions and agencies of the state and government controlled entities and other enterprises must be governed by democratic values and principles enshrined in the Constitution, including the principle that "employment, training and advancement practices must be based on merit, ability, objectivity, fairness, equality of men and women and the inclusion of persons with disabilities." Public Service Act s.18 Appointments and promotions, reflects the provision of s.194 of the Constitution and requires the PSC when considering candidates for appointment or promotion with the public services to have regard to the merit principle and to ensure there is no discrimination. Appointments are competitive. The PSC maintains a standing database of candidates who register for entry level positions and the PSC uses this register to identify potential candidates for procurement roles. There is a sub-system for students who can apply for a placement within a PMU for a period of up to a year as part of their university studies. More senior procurement posts are advertised. The qualifications and experience of all candidates is checked and assessed against job descriptions. All candidates are interviewed prior to joining the public service and may also undergo psychometric testing. PSC appointees are subject to the public service conditions of service, standard civil (public) service career progression applies and according to the PSC, turnover of procurement staff is not high. Career progression and promotion is dealt with in accordance with PSC procedures. Local authorities advertise procurement posts in newspapers, both local and nationwide and on websites, with relevant qualifications specified. Local authorities who the MAPS Assessment team spoke with indicated that due to remuneration levels, they find it difficult to attract talent.

[84] Sample standard job descriptions for procurement roles were provided by the PSC to the MAPS Assessment team, December 2025.

Parastatals/SOEs also advertise procurement posts in national newspapers and on their websites. They specific relevant qualifications with junior staff likely to require relevant diplomas or certificates and more senior staff required to have degree level qualifications and membership of professional associations such as CIPS.

Professional development and certification
The PPDPA Regs. S.89 Licensing of procurement officers and procurement management units, provides for PRAZ to establish a system for licensing of procurement officers and procurement management units that engage in procurement proceedings that require review by the SPOC. The licensing of procurement professionals pursuant these provisions has not been operationalised due to ongoing technical debate as to which is the appropriate institution for the licensing of procurement professionals.
Certification programme: PRAZ has therefore focussed on establishing a certification programme for procurement professionals customised for Zimbabwe. PRAZ has worked with the International Training Centre of the International Labour Organization (ITC-ILO) to establish the certification programme.[85] Thirty trainers have been trained to deliver the three-tiered programme. During 2024, participants in the certification programme achieved Level 1 and Level 2 certification.
Southern African Public Procurement Training Academy (SAPPTA) established by PRAZ (see analysis at 8(a)(a)) is proposing to offer the Certificate in Procurement Management at three levels with each level covered in a six-week course, run on a cost recovery basis. There are also proposals to deliver CIPS and CILT lectures.

Funding of professional development: According to the MDAs, local authorities and parastatals who the MAPS Assessment Team met, they will fund membership of professional organisations. However, due to current resource constraints, study for professional qualifications such as CIPs is self-funded. During the engagement one Agency confirmed that it funds professional qualifications and receives high numbers of applications for posts.

Gap analysis

Recommendations

Assessment criterion 8(b)(c):
Staff performance is evaluated on a regular and consistent basis, and staff development and adequate training is provided.

Conclusion: No gap

Qualitative analysis
Standard civil (public) service evaluation and progression apply to procurement professionals within MDAs. The PSC Public Service Academy provides general public service training including annual refresher courses on management and leadership skills development. Senior level PMU staff in MDAs have performance-based contracts. A procurement module is included in management skills development training for staff at deputy director level. PSC has not delivered all of the training it would like to due to financial constraints. Training is also delivered internally at MDA level. PRAZ delivers specialist procurement training (see analysis at 8(a)(a)).

Gap analysis

Recommendations

Sub-indicator 8(c)
Monitoring performance to improve the system

Assessment criterion 8(c)(a):

[85] https://www.itcilo.org/projects/national-professional-certification-programme-procurement-management-zimbabwe

Pillar II. Institutional Framework and Management Capacity

The country has established and consistently applies a performance measurement system that focuses on both quantitative and qualitative aspects.
Conclusion: No gap
Qualitative analysis Performance measurement of individual PE's performance and the procurement system is led by PRAZ primarily through its Monitoring and Evaluation activities. PRAZ collects monthly data from procuring entities which is used to monitor compliance and provide feedback to individual procuring entities. PRAZ also prepares Quarterly stakeholder monitoring reports providing consolidated data on the operation of the procurement system, primarily drawn from the monthly data returns from PEs. PRAZ also undertakes detailed compliance reviews of the activities of selected PEs the outcome of which include comments and recommendations for improvement in performance. Monthly data is currently collected using a standard monthly return template spreadsheet. The introduction of the eGP system is a potential gamechanger in terms of data collection and availability to enhance performance measurement PRAZ was established in 2018. In 2019, pursuant to its monitoring function, PRAZ introduced a system of monthly reporting by procuring entities to PRAZ, which provides data which can be used for performance measurement of the public procurement system as a whole as well as analysis of performance by individual procuring entities (PEs). Data addressed both quantitative and qualitative aspects. Data from Annual Procurement Plans (APPs) and amendments APPs which must be submitted to PRAZ, and now published on eGP, also feeds into procurement performance measurement (see 4(a)(a)). PRAZ also undertakes compliance reviews of individual PEs which can be used by PEs to improve procurement performance. Development of the monitoring and evaluation activities of PRAZ has been incremental. The monthly return template spreadsheet completed by PEs and submitted to PRAZ includes data on: PMU staffing and staff movements; procurement budget expenditure and variances; number and value of procurements conducted: information on procurements conducted by procurement method, supplier and procuring entity industry type as well as cancelled procurements. This provides a valuable resource for performance measurement and data to support both individual PEs and higher-level strategic policy and decision making. Compliance by PEs with monthly reporting requirements has increased to approximately 90% of procuring entities submitting monthly data. (See 7(a)(c)). The introduction of the eGP system is a potential gamechanger in terms of data collection and availability to enhance performance measurement, to support both individual PEs and inform strategic policy making. Full adoption and use by all PEs of all eGP modules should result in collection of more and enhanced data through those means. PRAZ is in the process of customising reports from eGP to be used in monitoring and evaluation and developing new reports drawing on eGP data to drive dialogue on issues as bid award patterns and payment progress. PRAZ produces a number of reports based on the monthly procurement returns submitted by procuring entities providing both feedback on performance to procuring entities and consolidated data shared with key institutions. **Compliance monitoring feedback reports for PEs:** PRAZ provides feedback direct to procuring entities in the form of compliance monitoring feedback reports - to provide feedback, compliance tracking and guidance to procuring entities. Feedback is varied including, for example, flagging inconsistencies in reported data or concerns about PMU resource levels. PRAZ also tracks progress on selected contracts, for example to check on payments made. **Compliance evaluation synopsis reports for PEs:** PRAZ reviews the performance of each procuring entity for each quarter. It provides each procuring entity with a quarterly synopsis and also an annual compliance evaluation report to assist Accounting Officers set compliance performance targets. **Contract monitoring reports for PEs:** PRAZ provides quarterly contract monitoring reports to procuring entities, drawing on self-reported data from PEs. PRAZ will flag concerns, such as delays in contract payments and seeks responses from the PE concerned. **Quarterly Stakeholder Reports:** PRAZ also prepares Quarterly Stakeholder Reports which provide a comprehensive overview of procurement statistics at national level, offering stakeholders a broader perspective on trends and

patterns to facilitate informed decision making. Quarterly Stakeholder reports are primarily based on data received from procuring entities through their monthly returns but also draw on data from other PRAZ workstreams such as SPOC reviews and compliance monitoring reports produced following compliance visits to individual procuring entities.

Compliance Reviews of individual PEs: PRAZ has also implemented a system of Compliance Review of individual procuring entities. Since 2021 PRAZ has conducted Compliance Reviews of over 200 institutions to profile the procurement affairs of those PEs. Areas of review include PMU standing, procurement planning performance, direct procurements, record adequacy and contract delivery and vendor management. Compliance Reviews involve visits to and direct engagement with the selected PEs including meetings and interviews, records inspection, assessment of procurement planning performance sampling and scrutiny of contract delivery and vendor management as well as profiling of PE procurement patterns. In its Compliance Review Report PRAZ provides both comments and recommendations to PEs for improved compliance.

Gap analysis

Recommendations

Assessment criterion 8(c)(b):
The information from the performance measurement system is used to support strategic policy making on procurement.

Conclusion: No gap

Qualitative analysis

In its Quarterly Stakeholder Reports, PRAZ highlights data which can be used to inform and support strategic policy making. Examples include: flagging projected actual expenditure per procuring entity industry category, which indicates sectors likely to lead in public sector projects and operations which will require sustained support; providing analysis of domestic vs. international procurements, to help inform decisions on how best to leverage the benefits of each approach, and; highlighting the continued high use of direct procurement, working against the strategic outcome of increased transparency.
A good example of how data from PRAZ's M&E activities has fed through into strategic policy making is in the context of the Emergency Road Rehabilitation Programme (ERRP2)[86] following declaration of a state of disaster on all rural and urban road infrastructure network. The programme encompassed various types of works covering general maintenance, patching and rehabilitation, reconstruction and new road construction. M&E picked up on various issues including procurement above set ceiling rates, failure to embark on competitive procurement processes, less rigorous evaluation of key criteria, under- performance of contracts. This resulted in policy-based guidelines on applicable methods for different classes of works under the programme, bidding periods and requirements to include additional selection criteria for contractor selection in order to achieve procurement objectives.

Gap analysis

Recommendations

Assessment criterion 8(c)(c):
Strategic plans, including results frameworks, are in place and used to improve the system.

Conclusion: No gap

[86] PRAZ Circular OPS/1 of 2022.

Qualitative analysis PRAZ has recently prepared its third Strategic Plan since its establishment in 2018. PRAZ has prepared a comprehensive Strategic Plan 2026-2030, aligned with objectives of NDS2 and with the aim of laying the groundwork for innovative public procurement practices. The previous Strategic Plan 2021-2025 was developed in line with NDS1. The Strategic Plan 2026-2030 clearly identifies reform initiatives based on three pillars - to advance public procurement regulation, deepen digitalisation and assurance and strengthen governance and institutional capacity - linked to national priorities. It includes a comprehensive stakeholder analysis, five-year roadmap, a detailed performance framework and clear allocation of responsibilities. The MAPS Assessment team notes activities underway in respect of Year 1 outcomes.
Gap analysis
Recommendations
Assessment criterion 8(c)(d): Responsibilities are clearly defined in the strategic action plans.
Conclusion: No gap
Qualitative analysis See analysis at 8(c)(c).
Gap analysis
Recommendations

Pillar III. Public Procurement Operations and Market Practices

Indicator 9. Public procurement practices achieve stated objectives

Sub-indicator 9(a)
Planning

Assessment criterion 9(a)(a):
Needs analysis and market research guide a proactive identification of optimal procurement strategies.

Conclusion: High risk gap

Qualitative analysis
The assessment consistently reveals a persistent failure to fully embed evidence-based needs analysis and rigorous market research into the core of procurement planning. While Procuring Entities (PEs) recognise the importance of Annual Procurement Plans (APPs), the planning process is often superficial. Decisions within these plans are frequently disconnected from crucial factors such as market capacity, current pricing trends, and genuine operational needs.
Furthermore, the integrity of the approved plans is routinely undermined by the frequent urgent and unplanned procurements, which override scheduled activities. This pattern is a clear signal of weak internal controls and limited accountability within the system.
Additional concerns compound this situation, including the inconsistent use of the APP template and amendment by PEs of the template despite the availability of a standard version on the eGP system, and a poor level of coordination between user departments and procurement units. This lack of synchronisation directly results in technical specifications being submitted late or in poor quality.
The MAPS Assessment team explored these findings from the sampling process in a discussion forum with representatives of procuring entities (sampled PEs and additional PEs not sampled). Discussions highlighted the lack of involvement of PMUs in the early stages of the budget planning process and perceptions that finance teams operate in silos.

Ultimately, these interconnected weaknesses promote reactive procurement behaviour across the board, leading to misaligned budgets and a heightened risk of inflated prices. The problem is thus systemic, cross-cutting, and carries direct, substantive consequences for achieving value for money, representing a high-risk deficiency within the overall procurement framework.

Gap analysis
Evidence based needs analysis to identify requirements and effective market research are not embedded in the planning process and thus are not available to inform the development of optimal procurement strategies. Weak planning processes combined with poor coordination, limited involvement of PMUs at early budget planning stages and poor internal controls further contribute to reactive procurement behaviours, increasing the likelihood of procurement not meeting user needs and poor value for money outcomes.

Recommendations
Mandate the use of evidence-based Needs Assessments and Market Research before finalizing APP and consider measures to ensure early engagement of PMUs in the PE budget planning process. Document the needs assessment and market research exercises and maintain the records in the procurement file.
The eGP system should be enhanced to support standard market research (AI-assisted), with a standalone process for complex procurements.

Implement capacity building initiatives focused on conducting market research and needs assessment.
Consider measures to ensure consistent use of the APP template to improve compliance and data quality **and** to strengthen internal controls and accountability.
See also, 9(c)(e).

Assessment criterion 9(a)(b):
The requirements and desired outcomes of contracts are clearly defined.

Conclusion: High risk gap

Qualitative analysis

Technical shortcomings in the development of procurement specifications are widespread. Over 50% of the sampled files contain specifications that are unclear and incomplete, which inherently leads to distorted market participation. The assessment identified instances where suppliers submitted bids outside their core business expertise, pointing directly to a poor alignment between the defined technical requirements and the actual capabilities available in the market.

The evaluation of bids is a critical element in ensuring that the specified requirements and desired outcomes of contracts are met. Similar weaknesses to those noted in the preparation of procurement specifications are observed in the design of evaluation criteria. The criteria are poorly structured, insufficiently detailed, or lacking necessary clarity. The assessment observed a number of bidders requesting clarifications, inconsistent scoring by evaluation members and misinterpretation of requirements by bidders leading to distorted pricing. All this may lead to increased likelihood of procurement complaints. The assessment observed a case that led to litigation which revised the award based on the litigation outcome. This ultimately contributes to the risk of contract awards being given to suppliers who are unqualified or otherwise unsuitable for the task.

Gap analysis

Widespread technical shortcomings are observed, with vague/incomplete specifications and poorly structured evaluation criteria which can compromise the transparency, fairness, and overall integrity of the evaluation process as well as poor procurement outcomes.

Recommendations

Introduce structured, specialised training for user departments and procurement staff on drafting specifications (functional vs. technical) and designing objective, quantitative evaluation criteria to improve the responsive bid rate in line with PPDPAA s.6(h).

Assessment criterion 9(a)(c):

Sustainability criteria, if any, are used in a balanced manner and in accordance with national priorities, to ensure value for money.

Conclusion: High risk gap

Qualitative analysis

The assessment found no evidence of a structured implementation of sustainable procurement practices within the selected entities which incorporated the full components of economic, social and environmental considerations. Instead, a few isolated cases were observed where one component of sustainable procurement would be considered in the technical evaluation but would not be carried into the contract as well as execution, thereby rendering the process inconsistent.

This inconsistent application represents a significant strategic gap, particularly given the national commitment to sustainable development as articulated in the National Development Strategy (NDS2). The NDS2 explicitly aligns its thematic priorities such as climate resilience, environmental protection, value-addition, social development, and inclusive growth directly with the United Nations Sustainable Development Goals (SDGs).

Gap analysis

Sustainable procurement requirements are not used in practice. There is no evidence of a structured implementation of sustainable procurement practices and evaluation criteria being applied in the planning and conduct of procurement and thus a failure to align public spending decisions with national NDS2/SDG priorities and PPDPAA which stipulate the implementation of any environmental, social, economic and other policy that is authorised or required by any law to be taken into account by a procuring entity in procurement proceedings.

Recommendations
Develop and issue a National Sustainable Procurement Policy in line with contracts (which should be clearly defined) (i) below, PPDPAA s.4(1)(e), s.6(j) and s.25(1). Mandate the inclusion of specific, weighted sustainable evaluation criteria and corresponding performance clauses (e.g. life-cycle costing) in all tender documents for relevant categories. Provide staff training and capacity building programs focused on Sustainable Procurement.

See also, 3(a) Sustainable Public Procurement.

Sub-indicator 9(b)
Selection and contracting

Assessment criterion 9(b)(a):
Multi-stage procedures are used in complex procurements to ensure that only qualified and eligible participants are included in the competitive process.

Conclusion: High risk gap

Qualitative analysis
Of the 12 complex procurements assessed from the 108 files across the selected Procuring Entities (PEs), there is no evidence of the implementation of multi-stage procedures (pre-qualification) to ensure that only qualified and eligible participants are included in the competitive process.

In contrast to this procedural omission, the assessment did uncover evidence of a recurring practice involving the use of a pre-selected, limited pool of key suppliers for specific items, notably vehicles. While the utilisation of these suppliers in certain tenders was justified on file through prior management approval, there remains a critical gap in that no documentation or record was found to explain or justify the initial criteria, process, or rationale used to identify and select this specific closed group of suppliers in the first place.

Gap analysis
Formal prequalification procedures for multi-stage complex procurements were not observed in the sampled files. No documentation or record to explain or justify use of limited pool of key suppliers.

Recommendations
PRAZ should enforce mandatory use of formal, documented prequalification/registration processes for complex/high-value categories of contracts (which should be clearly defined) through eGP.
Document and publish the criteria and rationale for inclusion/exclusion in any closed list, ensuring fairness and transparency.

Assessment criterion 9(b)(b):
Clear and integrated procurement documents, standardised where possible and proportionate to the need, are used to encourage broad participation from potential competitors.

Conclusion: No gap

Qualitative analysis
The assessment identified a positive and robust operational control regarding documentation. There is clear evidence of the utilisation of standardised and integrated procurement documents across the various procurement methods employed.

Specifically, readily available and consistent templates for Requests for Quotations (RFQs), Invitations to Bid (ITBs), and Requests for Proposals (RFPs) were consistently found across the reviewed files. Crucially, these templates demonstrated appropriate alignment with the specific rules and requirements of the procurement methods for which they were utilised. This effective use of standardised and integrated documentation represents the best practice that strengthens the fairness and predictability of the bidding environment.

Gap analysis

Recommendations

Assessment criterion 9(b)(c):
Procurement methods are chosen, documented and justified in accordance with the purpose and in compliance with the legal framework.

Conclusion: No gap

Qualitative analysis
The assessment confirms a positive finding regarding procedural accuracy in that the records on file consistently demonstrate that the procurement methods selected were appropriately aligned with the nature of the works, goods or services being procured, as provided for in the relevant legislative provisions. This indicates a general understanding and adherence to the rules governing method selection based on value and complexity.

Whilst procedural accuracy and compliance with current rules governing method of selection is acknowledged, the MAPS assessment has noted elsewhere the high use of the direct procurement method. The MAPS Assessment team has made several recommendations for review of relevant provisions in the PPDPAA to evaluate their fitness for purpose and amendments to ensure that direct procurement is used only in exceptional cases. *See analysis, Gaps and Recommendations at 1(b)(d).*

Gap analysis

Recommendations

Assessment criterion 9(b)(d):
Procedures for bid submission, receipt and opening are clearly described in the procurement documents and complied with. This means, for instance, allowing bidders or their representatives to attend bid openings, and allowing civil society to monitor bid submission, receipt and opening, as prescribed.

Conclusion: No gap

Qualitative analysis
PPDPAA s.46 provides that “the opening of bids shall be conducted in public, and the procuring entity shall invite bidders or their representatives to witness it”. The SBDs appropriately make allowance for bidders or their authorised representatives to participate in bid opening.

Civil society monitoring of bid submission, receipt and opening is not specifically prescribed in the regulatory framework, but the PPDPAA provides that the opening of bids shall be conducted in public (see above).
See also, analysis at 11(c) on participation of civil society in procurement processes.

Bidders' participation in public tender openings was applicable when bids were submitted in hard copy. However, since the introduction and adoption of e-GP, public bid openings are no longer taking place, and bidders are not receiving the automated bid opening reports generated by the e-GP system
See also, analysis at 1(j)(a) on need to update legislative framework to reflect use of eGP.

Gap analysis

Recommendations

Assessment criterion 9(b)(e):
Throughout the bid evaluation and award process, confidentiality is ensured.

Conclusion: Medium risk gap
Qualitative analysis There were instances where the bidders had access to the information regarding the bid evaluation results before the final decision. This was also mentioned to the MAPS Assessment team by procuring entities in direct engagement with them in the PE discussion forum. The MAPS Assessment team could not, however, get any documentary evidence and this issue was not observed as widespread in the sampled files. The introduction and use of the eGP system have successfully strengthened the integrity of the initial stages, providing demonstrable evidence of confidentiality during both the bid submission and the automated bid opening processes. However, due to the partial adoption of the eGP system, where the process is not fully end-to-end, the crucial subsequent stages of evaluation and contract award remain offline.[87] This reliance on manual, non-integrated processes for sensitive decision-making inherently compromises the level of confidentiality and security that can be guaranteed. To fully secure the process and guarantee confidentiality, it is essential that the eGP system adaptation be completed to encompass the full evaluation and award cycle. *See also, recommendations at 1(j)(a) on legal framework allowing or mandating e-procurement solutions.*
Gap analysis Confidentiality may have been compromised during the evaluation and award stages for processes conducted offline, prior to adoption of eGP for these stages.
Recommendations Prioritise end-to-end adoption of the eGP system to close potential compromises of confidentiality. In the meantime, pending full eGP rollout, mandate the use of case specific declaration of Interest (DoI) on each procurement process undertaken. PRAZ should issue a standard version of the DoI and control revisions. *See also, recommendations at 14(g)(e) Conflict of interest statements, financial disclosure forms.*
Assessment criterion 9(b)(f): Appropriate techniques are applied to determine best value for money based on the criteria stated in the procurement documents and to award the contract.
Conclusion: Medium risk gap
Qualitative analysis The assessment revealed that most award decisions are based on price and overlook the total cost of ownership which encompasses all costs associated with acquiring, operating, maintaining a product or service over its entire lifecycle. It was also observed that certain Procuring Entities (PEs) have independently incorporated due diligence processes to enhance the assessment of Value for Money (VfM). While these efforts indicate a positive intent to secure better value, the current implementation has significant limitations in that it is an additional, separate layer grafted onto the overall evaluation process, rather than being an integrated component of the initial planning or evaluation criteria. This suggests the VfM assessment is often reactive rather than proactive. Secondly, the process primarily focused on reviewing local market prices obtained from suppliers that did not participate in the formal tendering process. These due diligence practices, while well-intentioned, are ad-hoc and methodologically weak, failing to replace the need for an integrated, evidence-based approach to VfM assessment throughout the entire procurement cycle.
Gap analysis

[87] PRAZ Circular OPS/2 of 2025, dated 26 September 2025, notes ongoing concerns about continued practice of conducting procurement proceeding outside the eGP system, especially for RFQ and secondary bidding under Framework Agreements.

Total cost of ownership is not considered. VfM due diligence is an ad-hoc, separate layer, relying on non-participating supplier pricing (methodologically weak). Effort is well-intentioned but inefficient and not integrated into the competitive process.

Recommendations

Adopt an integrated, lifecycle-based Value for Money framework that embeds Total Cost of Ownership into early procurement planning and formal evaluation criteria. Provide capacity building to Procurement, Finance and Audit staff on how to conduct VFM assessments.

Assessment criterion 9(b)(g):

Contract awards are announced as prescribed

Conclusion: High risk gap

Qualitative analysis

Source: Sample procurement cases.

In the sample files reviewed, notice of contract award was published within one month of contract award in only 41% of cases. In 57% of the cases information on contract award was missing. 2% were not compliant. The fact that 57% of the files miss information on publication of award presents a critical transparency failure. This omission makes it impossible to verify compliance for over half of the contracts.

Gap analysis

While the compliance rate stands at 41%, the substantial lack of documentation in the remaining majority suggests either a widespread failure to publish the award information as required; or serious lapse in record-keeping and documentation of the publication event itself.

Recommendations

Make publication of the award notification on the eGP portal an automated and mandatory step immediately following conclusion of the evaluation process and contract signing after the expiration of the Standstill period. The system should automatically generate and timestamp the notice, which then serves as the official record of publication.

Assessment criterion 9(b)(h):

Contract clauses include sustainability considerations, where appropriate

Conclusion: High risk gap

Gap analysis

Sustainability considerations are absent from contract clauses. Sustainable development, despite being a national priority, is not a legally enforceable component of the public contract, thus rendering the government unable to leverage its spending power to drive economic, environmental and social responsibility.

Recommendations
Develop and issue a National Sustainable Procurement Policy. Mandate the inclusion of specific, weighted sustainable evaluation criteria and corresponding performance clauses (e.g. life-cycle costing) in all tender documents for relevant categories.
See analyses at 3(a) and 9(a)(c).

Assessment criterion 9(b)(i):
Contract clauses provide incentives for exceeding defined performance levels and disincentives for poor performance

Conclusion: Medium risk gap

Qualitative analysis
Contract clauses currently include provisions for disincentives or penalties for poor performance, but they fail to provide corresponding incentives for exceeding defined performance levels. In essence, the contracts are designed to punish failure but not to encourage excellence, thereby promoting a 'meet-the-minimum' compliance culture rather than a collaborative environment focused on maximizing project value.

Gap analysis
Contracts include disincentives (penalties) for poor performance but lack incentives for exceeding defined performance levels. Contracts meet basic enforcement but fail to motivate excellence and maximize project value.

Recommendations
Introduce a balanced incentive framework that rewards exceptional contractor performance alongside existing penalties. This approach promotes proactive improvement, supported by clear, measurable performance indicators, well-defined incentive clauses, and robust monitoring and verification to ensure fair and objective assessment. Provide staff training and capacity building initiatives focused on contract management in line with PPDPAA S.79.

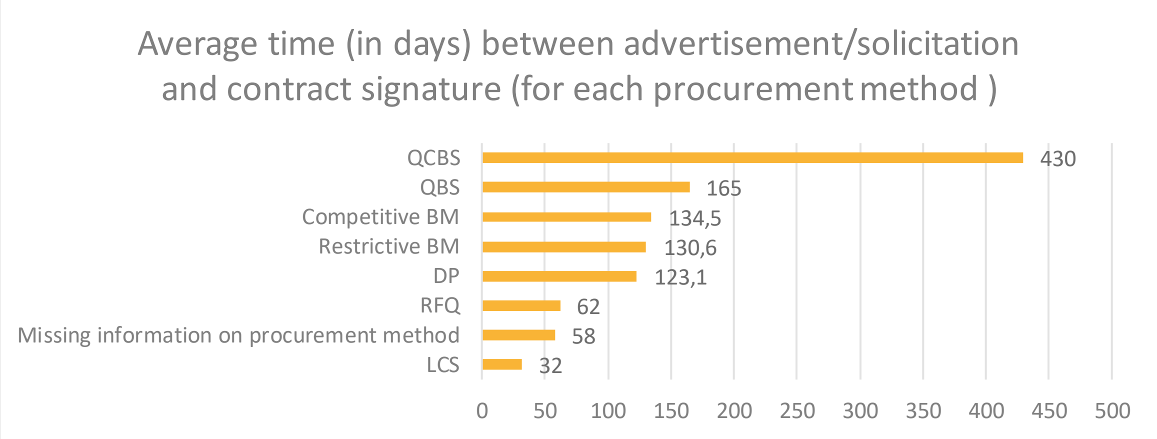
Assessment criterion 9(b)(j):
The selection and award process is carried out effectively, efficiently and in a transparent way*

Conclusion: Medium risk gap

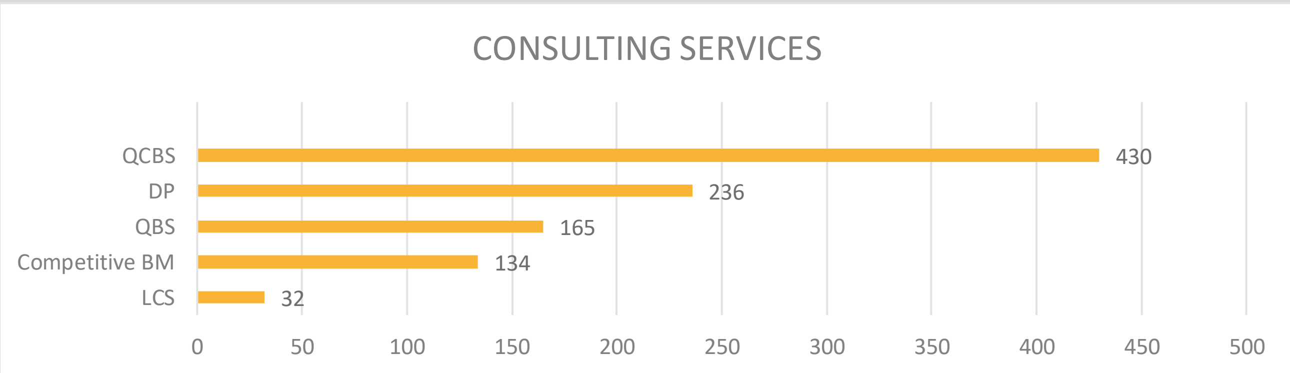
Qualitative analysis
Out of the 108 files assessed, 83% of the contracts were successfully awarded, with 4% cancelled and 14% missing information. The data indicates general success in finalising contracts, but the large proportion of undocumented files obscures the true efficiency and integrity of the system.

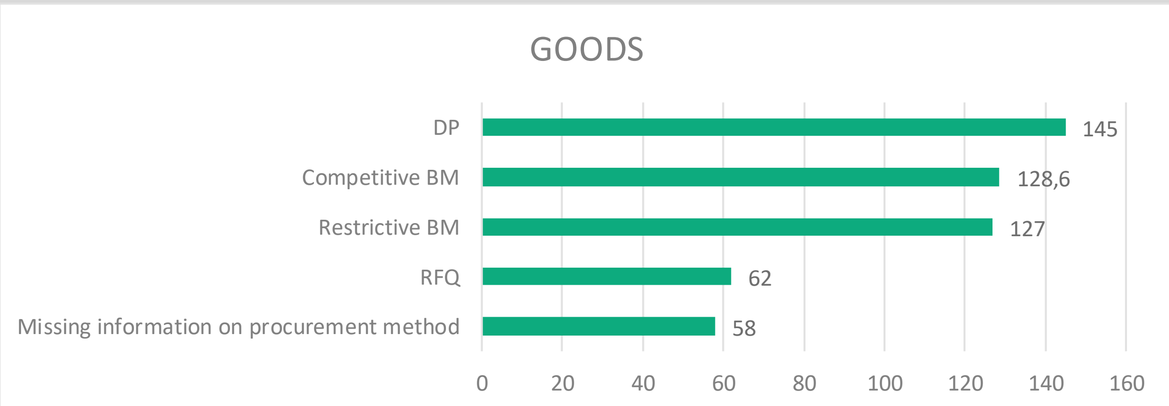
Quantitative analysis

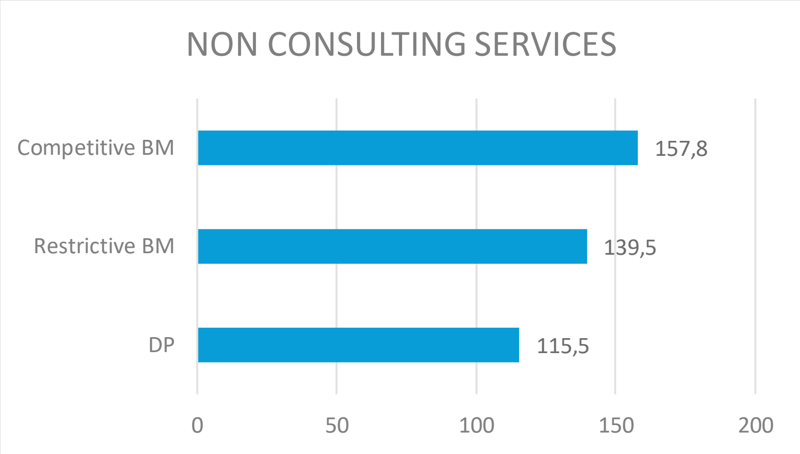
Recommended quantitative indicators to substantiate assessment of sub-indicator 9(b) Assessment criterion (j):
- average time to procure goods, works and services
number of days between advertisement/solicitation and contract signature (for each procurement method used)

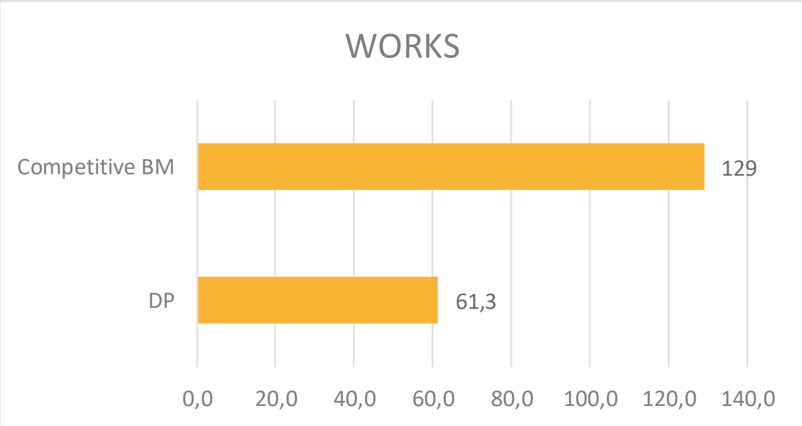


The assessment determined that the average time taken to complete a procurement process is 144.3 days (more than four months).







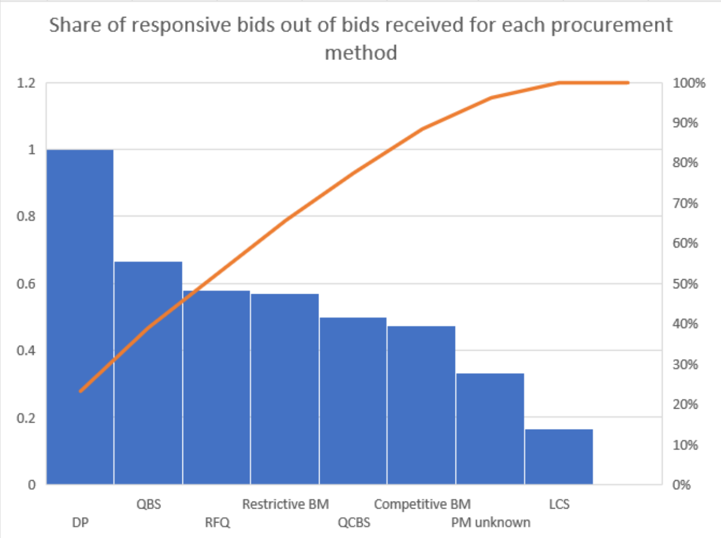


Source: Sample procurement cases.

As illustrated by the diagram above, the comprehensive assessment of 83 procurement files (Out of the 108, 25 cases with dates missing were discarded in computing this) for the acquisition of goods, works, and services reveals a prolonged duration in the procurement cycle. The analysis indicates that the average time required to complete a procurement process is 131.8 days. This extended average duration suggests a need for a targeted review of procedural bottlenecks, particularly in the planning, specification, and evaluation phases, to significantly enhance operational efficiency.

- average number (and %) of bids that are responsive (for each procurement method used)

Out of a total of 659 bids received for the 108 cases reviewed, 321 (48.7%) were compliant and 338 (51.3%) were non-compliant.

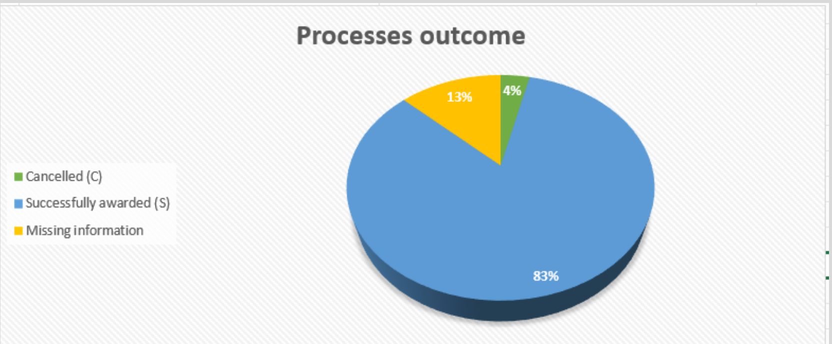


Source: Sample procurement cases.

The analysis of procurement processes indicates that the average rate of responsive bids compared to the total number of bids received is 49.57%. A higher rate of non-responsive bids leads to wasted time and resources for both the Procuring Entity (in reviewing and rejecting bids) and the suppliers (in preparing disqualified bids), underscoring a need to improve the clarity and quality of tender documentation.

- share of processes that have been conducted in full compliance with publication requirements (in %)
Data not available

- number (and %) of successful processes (successfully awarded; failed; cancelled; awarded within defined time frames)



Source: Sample procurement cases.

Out of the 108 files assessed, 90 cases or 83% of the contracts were successfully awarded, with 4 cases or 4% cancelled and 13 cases or 14% missing information. The data indicates general success in finalizing contracts, but the large proportion of undocumented files obscures the true efficiency and integrity of the system.

Source for all: Sample of procurement cases.

Gap analysis
The selection and award process is not conducted effectively, efficiently or transparently due to a high rate of non-responsive bids and a prolonged procurement process. This results in wasted time and resources for both the Procuring Entity (in reviewing and rejecting bids) and the suppliers (in preparing non-compliant bids).

Recommendations
Provide capacity building to both PEs and bidders to reduce non-responsive bids, shorten procurement timelines, and improve transparency and efficiency.

Sub-indicator 9(c)
Contract management

Assessment criterion 9(c)(a):
Contracts are implemented in a timely manner.*

Conclusion: High risk gap

Qualitative analysis
Most of the procurement files examined did not contain one or more of the quantitative data points required to assess compliance with this criterion on whether contracts are implemented in a timely manner. The MAPS Assessment team was therefore unable to use quantitative data to substantiate whether contracts are implemented in a timely manner. The lack of available data on the procurement file is, in itself, a relevant finding for the purposes of assessment and leads to the conclusion that this criterion is not met.

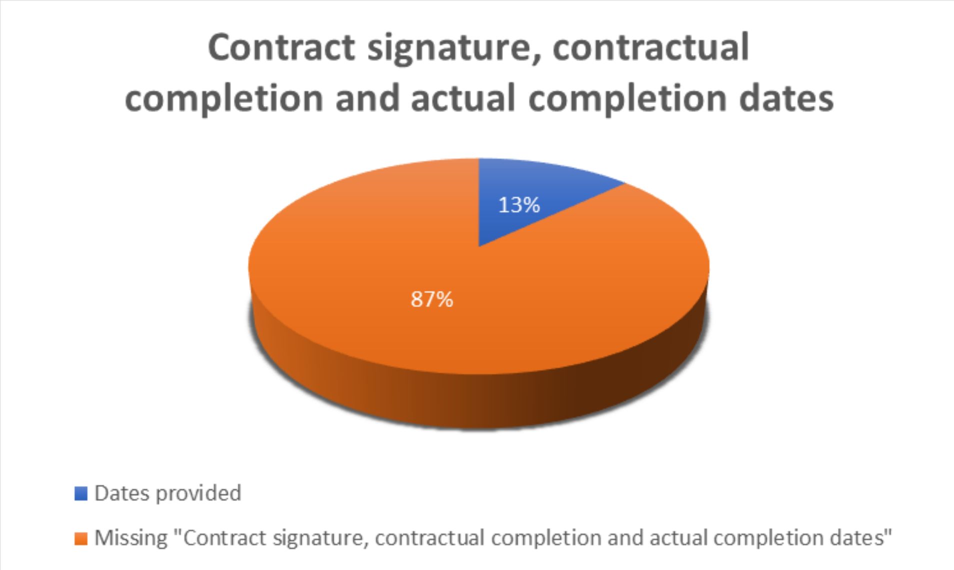
The analysis of the 108 procurement files reveals that in 87% of cases there is no data on one or more of the three critical data points: contract signature date, contractual completion date and actual completion date. Only a small percentage (13%) of the sampled files contained all relevant data necessary to assess compliance with this criterion. The MAPS Assessment team concluded that analysis of data based on only 13% of the sampled files was insufficient to draw robust conclusions in respect of assessment of time overruns.

Quantitative analysis

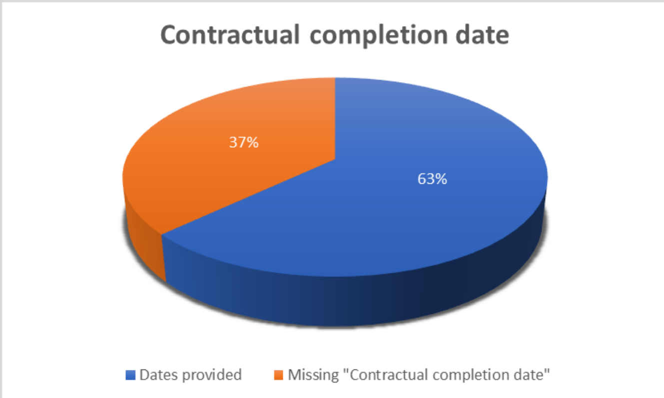
Recommended quantitative indicator to substantiate assessment criterion (a): time overruns (in %; and average delay in days).

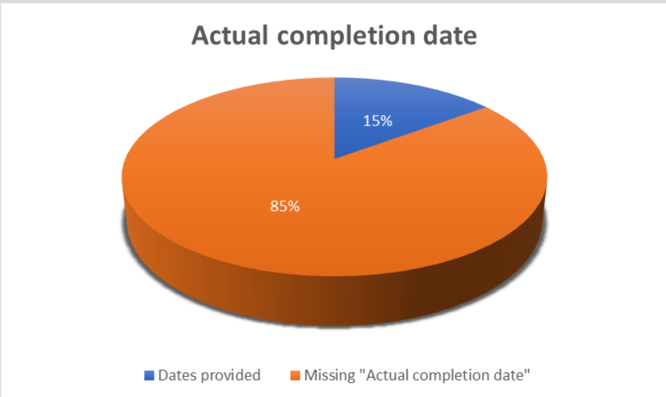
The full data required to substantiate assessment of time overruns was not available in 87% of the sampled files. The MAPS Assessment team concluded that analysis of data based on only 13% of the sampled files was insufficient to draw robust conclusions in respect of assessment of time overruns.

The following analysis is provided to assist understanding by providing the summary findings and a breakdown of data unavailability. Data availability on the procurement file declines during the post contract award phase.



Source: Sample of 108 procurement files.





Gap analysis

Consistent failure to document on the procurement file the stage from contract signature to final contract completion means that in most cases there is no reliable quantitative data available from the procurement files to assess time overruns. The lack of documentation and data is a significant finding leading the MAPS team to conclude that effective contract management is severely compromised and that a Gap must be assigned to this criterion.

See also analysis at 9(c)(b) and 9(c)(c)) results of sampling of procurement files.

Recommendations
Strengthen contract management by ensuring timely recording of key milestones on the procurement file, with clear accountability and regular monitoring. Support this through staff training to improve consistent documentation, reliable performance metrics, and accurate supplier evaluation.

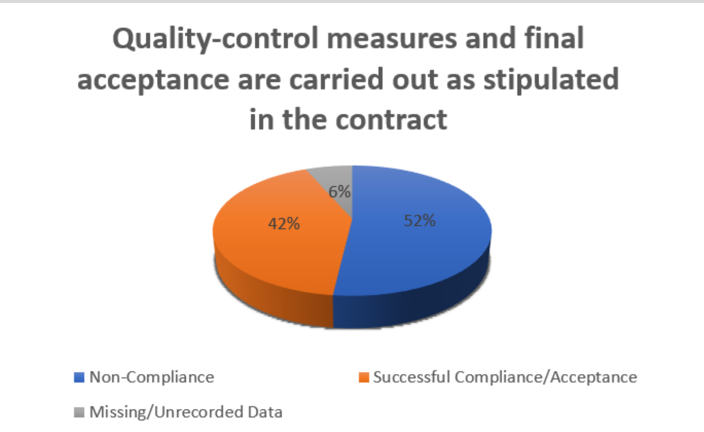
Assessment criterion 9(c)(b):
Inspection, quality control, supervision of work and final acceptance of products is carried out.*

Conclusion: Medium risk gap

Qualitative analysis
The assessment of the 108 procurement files reveals significant inconsistency in the application of quality control and final acceptance procedures. The most critical finding is that over half of the files (52%) were non-compliant, indicating that essential quality control measures and/or formal final acceptance procedures were not performed or documented with only 42% have been performed and 6% missing records. The system exhibits a major failure in the post-award phase, where the lack of rigorous Quality Control and final acceptance for over half of the contracts means the government is frequently paying for assets or services whose quality has not been formally verified.

Quantitative analysis

Recommended quantitative indicator to substantiate assessment criterion (b): quality-control measures and final acceptance are carried out as stipulated in the contract (in %).



Source: Sample of procurement cases.

Gap analysis
The level of non-compliance in Quality Control (QC) and final acceptance procedures is significant and means the Government might frequently be paying for goods/services whose quality and compliance have not been verified.

Recommendations
Payments should only be processed upon receipt of a signed and verified Proof of Delivery/Completion using the standardised forms signed by authorised personnel. Payment records a Deliveries/Completion should be in the procurement file.

Assessment criterion 9(c)(c):
Invoices are examined, time limits for payments comply with good international practices, and payments are processed as stipulated in the contract.

Conclusion: High risk gap

Qualitative analysis

The procurement file should contain a full, complete and accurate record of the entire procurement process, from planning through to delivery and contract closure, including invoices and payment records. Most of the procurement files examined did not contain records of payment and so it was not possible for the MAPS Assessment team to assess compliance with this assessment criterion on the basis of the information contained in those files. The lack of available data on the procurement file is, in itself, a relevant finding for the purposes of assessment and leads to the conclusion that this criterion is not met.

The MAPS Assessment team understand from engagement with PEs during the sampling process and the PE Forum, that, in many cases, payment records are retained by the finance department but there is often no reliable system for ensuring that payment records generated elsewhere in the organisation are shared with the procurement team and this is one of the reasons why procurement files are incomplete. The MAPS Assessment team learned of good practices where, in the absence of an automated process, a manual notification process is used, for example where the finance team automatically emails the procurement team to notify them of payment.

The most significant finding in assessing compliance with this criterion is that of 108 files sampled, 87% contained no record of payment on the procurement file. Of those files with records of payment, 11% are paid on time with 2% not paid on time.

The MAPS Assessment team concluded that analysis of data based on only 13% of the sampled files was insufficient to draw robust conclusions in respect of assessment of % of total invoices paid on time.

The issue of late payment and non-payment of invoices permeated discussions which the MAPS Assessment team had with stakeholders.

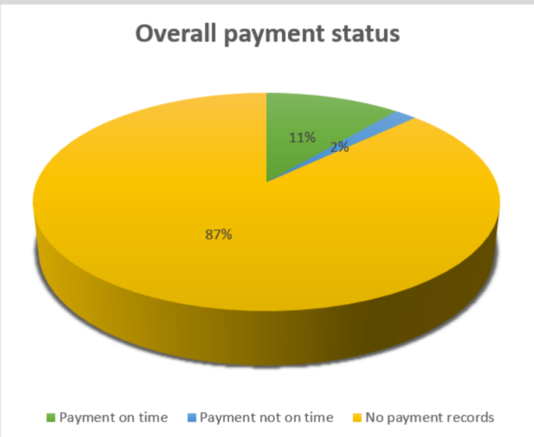
See also analysis at Indicator 4(b)(b) on the processing, authorisation and payment of invoices and the results of Private Sector Survey presented in that context which confirm high levels of delayed late or non-payment of invoices.

Quantitative analysis

Recommended quantitative indicator to substantiate assessment criterion (c): invoices for procurement of goods, works and services are paid on time (in % of total number of invoices).

The data below flags the lack of information available from the procurement file to assess whether or not invoices have been paid and whether payment was made on time. It may be the case that relevant payment records are maintained by the Procuring Entity, for example by the finance team, but in the vast majority of cases (87%) relevant records of payment were not available from the procurement file.

The MAPS Assessment team concluded that analysis of data based on only 13% of the sampled files was insufficient to draw robust conclusions in respect of assessment of % of total invoices paid on time.



Source: Sample of procurement cases.

Gap analysis

The procurement file should contain a full, complete and accurate record of the entire procurement process, from planning through to delivery and contract closure, including invoices and payment records. In 87% of the procurement files assessed there were no payment records found on the procurement file. Whilst payment records may, in practice, often be retained elsewhere the lack of complete records on the procurement file is a significant failure in file management which jeopardises both effective contract management and ease of audit. Incomplete file data also reduces the opportunities to use data analysis to identify opportunities to improve procurement practices.

Recommendations

Mandate the filing of payment records in the procurement file. Support this through staff training on records management to improve consistent documentation and reliable performance metrics.

Integrate the eGP system with the national Public Financial Management System (PFMS) so that payment authorisation and corresponding records are automatically linked to the procurement file, ensuring an unbroken audit trail.

See also, 4(b)(a) & 4(b)(b).

Assessment criterion 9(c)(d):

Contract amendments are reviewed, issued and published in a timely manner.*

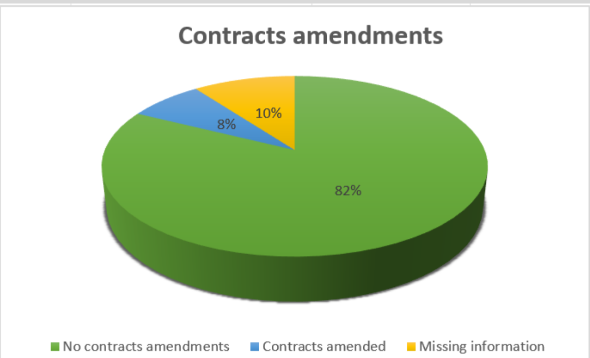
Conclusion: No gap

Qualitative analysis

The assessment team observed that contract amendments are reviewed and issued in timely manner. However, these amendments are not published since the Act does not require their publication. The high percentage of 82% of contracts that were not amended is a positive indicator of contract stability, suggesting that the initial requirements and terms were largely sufficient and unforeseen circumstances requiring change were limited. The data suggests a good level of contract stability, though the documentation failure for one-tenth of the files remains a concern for complete auditability.

Quantitative analysis

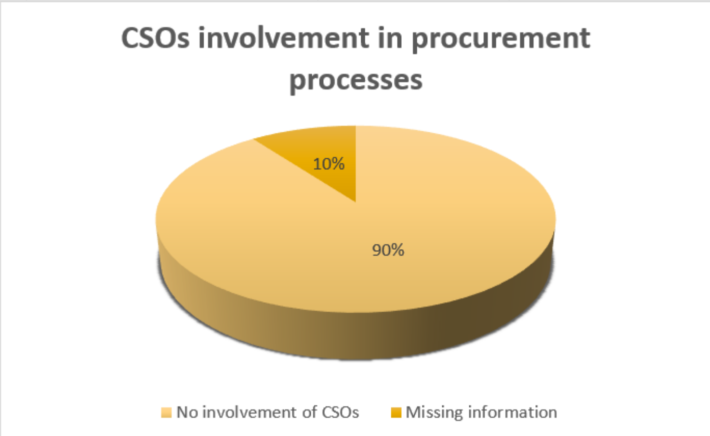
Recommended quantitative indicator to substantiate assessment criterion (d): contract amendments (in % of total number of contracts; average increase of contract value in %).



Source: Sample of procurement cases.

Gap analysis

Recommendations
Assessment criterion 9(c)(e): Procurement statistics are available and a system is in place to measure and improve procurement practices.
Conclusion: High risk gap
Qualitative analysis The assessment of the 19 selected PEs confirm that all entities possessed APPs. However, a key control deficiency was observed in that these plans were presented in varying formats, indicating a lack of adherence to a single, standardised template. Furthermore, while all PEs collected some statistical data on different aspects of their procurement processes, the nature and structure of this information were inadequate to form a robust, coherent system for effectively measuring, benchmarking, and improving procurement practices. While the requirement for planning and data collection is met on paper, the lack of standardisation and quality in the documentation means the system lacks the foundational information necessary for strategic decision-making and continuous improvement. *See also, analysis at 7(a)(c) & 8(c)(a) on collection, analysis and sharing of procurement data by PRAZ.*
Gap analysis All PEs have APPs, but in varying formats; statistical data maintained by PEs is inadequate for measuring and improving practices. Lack of standardised data and KPIs prevents performance benchmarking and continuous improvement.
Recommendations Mandate adherence to use of standard APP template for all PEs. Develop and enforce the tracking of a minimum set of Key Performance Indicators (KPIs) (e.g., responsive bid rate, average cycle time) through the eGP system. *See also, 9(a)(a).*
Assessment criterion 9(c)(f): Opportunities for direct involvement of relevant external stakeholders in public procurement are utilised.*
Conclusion: High risk gap
Qualitative analysis The assessment identified missed opportunities for the direct involvement of relevant external stakeholders in monitoring public procurement, as the regulatory framework does not facilitate the participation of civil society organisations (CSOs). A more comprehensive analysis is provided under indicator 11(c).
Quantitative analysis ***Recommended quantitative indicator to substantiate assessment criterion (f): percentage of contracts with direct involvement of civil society: planning phase; bid/proposal opening; evaluation and contract award, as permitted; contract implementation)***



Source: Sample of procurement cases.

Gap analysis
90% of files confirm the lack of direct involvement of CSOs. (Already covered in 9(b)(d), but re-emphasizing the post-award lack of oversight). There is no formal provision for external oversight by civil society throughout the entire procurement cycle.

Recommendations
Develop a framework for civil society monitoring. Institutionalise CSO access to bid opening records, publication schedules, and debriefing reports, in line with PPDPAA S.69(3) and best international practices to enhance external accountability.
See also, 11(c) direct engagement of civil society.

Assessment criterion 9(c)(g):
The records are complete and accurate, and easily accessible in a single file.*

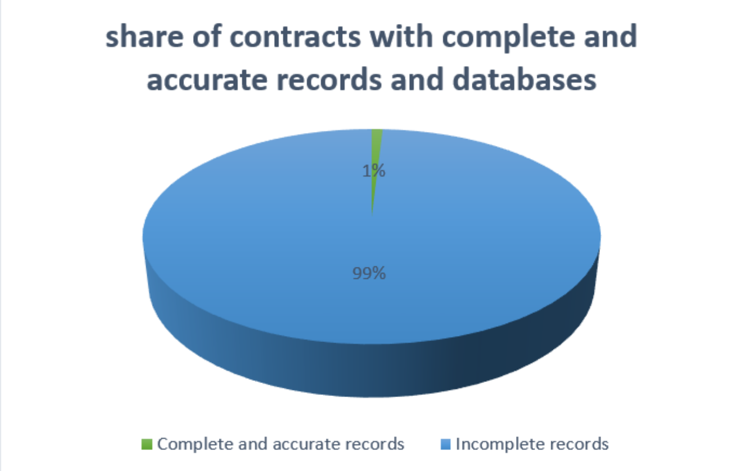
Conclusion: High risk gap

Qualitative analysis
As already noted in earlier analysis in 9(c)(c), the procurement file should contain a full, complete and accurate record of the entire procurement process, from planning through to delivery and contract closure, including invoices and payment records.
The assessment of the 108 procurement files highlights significant challenges in records management. The sampling of procurement files included assessment of the number missing documents measured against lists provided to the MAPS Assessment team by PRAZ of required documents by type of procurement process. It was observed that only 1% of the procurement files evaluated contained fully complete and accurate records.[88] Of the sampled procurement files which exhibited some level of incompleteness, 79.73% had up to 25% missing documents whilst 8.7% had more than 50% of required document missing.

This situation suggests a need for substantial improvements in documentation and file-keeping standards. The lack of information in many of the files poses potential risks to accountability and transparency, warranting immediate attention and action for enhancement.

Quantitative analysis
**** Quantitative indicators to substantiate assessment of sub-indicator 9(c) Assessment criterion (g):***
- share of contracts with complete and accurate records and databases (in %)

[88] PRAZ Circular OPS/2 of 2025, dated 26 September 2025, notes that for SPOC approval process, some PES are submitting incomplete procurement records that have not been signed by members of the evaluation committee, procurement management unit or the Accounting Officer



Source: Sample of 108 procurement files.

- ***Breakdown of files showing number of records missing***

Source: Sample of 108 procurement files

Gap analysis

The procurement file should contain a full, complete and accurate record of the entire procurement process, from planning through to delivery and contract closure, including invoices and payment records. Nearly all files sampled exhibited some level of incompleteness with most files missing up to 25% of expected documents, assessed against standard lists of documents by type of procurement process. This situation suggests a need for substantial improvements in documentation and file-keeping standards. The lack of full information in the majority of the files poses potential risks to accountability and transparency, warranting immediate attention and action for enhancement.

Recommendations

Introduce a mandatory digital checklist within the eGP system that prevents the closure of any file until all required documents (including completion dates, final QC reports, and payment records) are uploaded and verified. Implement a zero-tolerance policy for incomplete files. In the meantime, mandate the use of a standard content page on a procurement file in line with PPDPAA S.69(1) and (2). Provide staff training and capacity building programmes focused on records management.

Pillar III. Public Procurement Operations and Market Practices

Indicator 10. The public procurement market is fully functional

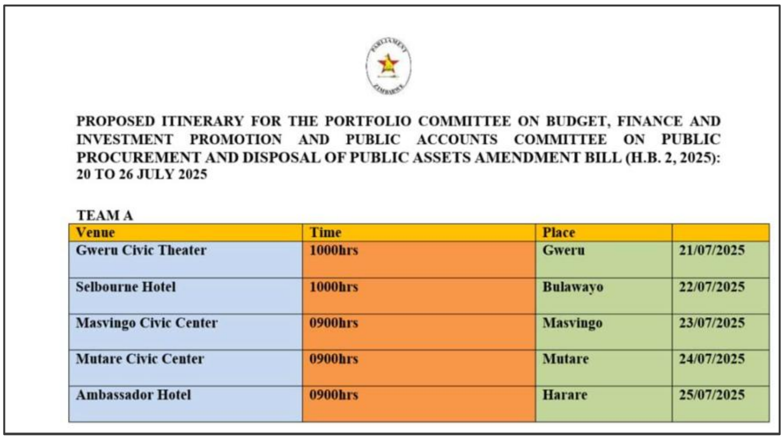
Sub-indicator 10(a) **Dialogue and partnerships between public and private sector**
Assessment criterion 10(a)(a): The government encourages open dialogue with the private sector. Several established and formal mechanisms are available for open dialogue through associations or other means, including a transparent and consultative process when formulating to the public procurement system. The dialogue follows the applicable ethics and integrity rules of the government.*
Conclusion: High risk gap + red flag

Qualitative analysis

The Constitution of Zimbabwe s.141 Public access to and involvement in Parliament, provides at s.141(a) that Parliament must "facilitate public involvement in its legislative and other processes and in the processes of its committees." And (b) "ensure that interested Parties are consulted about Bills being considered by Parliament, unless such consultation is in appropriate or impracticable."
https://www.parlzim.gov.zw/committee-system/committees-of-parliament/

PRAZ runs forums for consultation with stakeholders concerning proposed changes to the public procurement systems. The Office of the Attorney General also confirmed to the MAPS Assessment team that it conducts direct engagement with stakeholders, including representatives of the private sector, in order to consult on proposed changes and inform preparation of draft legislation.

In the period 21- 25 July 2025, the Portfolio Committee on Budget Finance and Investment Promotion and the Public Accounts Committee of the Parliament of Zimbabwe scheduled consultations in 5 locations in Zimbabwe. on proposed amendments to the PPDPAA. The aim of this process was to gather opinions and feedback from the public on the proposed amendments to the PPDPAA and these events were publicised on the PRAZ Facebook page. Stakeholders commented, in direct discussions with the MAPS Assessment team, that Parliamentary consultation in particular can be technical and framed in an over legalistic manner which is not conducive to meaningful public debate.



PROPOSED ITINERARY FOR THE PORTFOLIO COMMITTEE ON BUDGET, FINANCE AND INVESTMENT PROMOTION AND PUBLIC ACCOUNTS COMMITTEE ON PUBLIC PROCUREMENT AND DISPOSAL OF PUBLIC ASSETS AMENDMENT BILL (H.B. 2, 2025): 20 TO 26 JULY 2025

TEAM A

Venue	Time	Place	
Gweru Civic Theater	1000hrs	Gweru	21/07/2025
Selbourne Hotel	1000hrs	Bulawayo	22/07/2025
Masvingo Civic Center	0900hrs	Masvingo	23/07/2025
Mutare Civic Center	0900hrs	Mutare	24/07/2025
Ambassador Hotel	0900hrs	Harare	25/07/2025

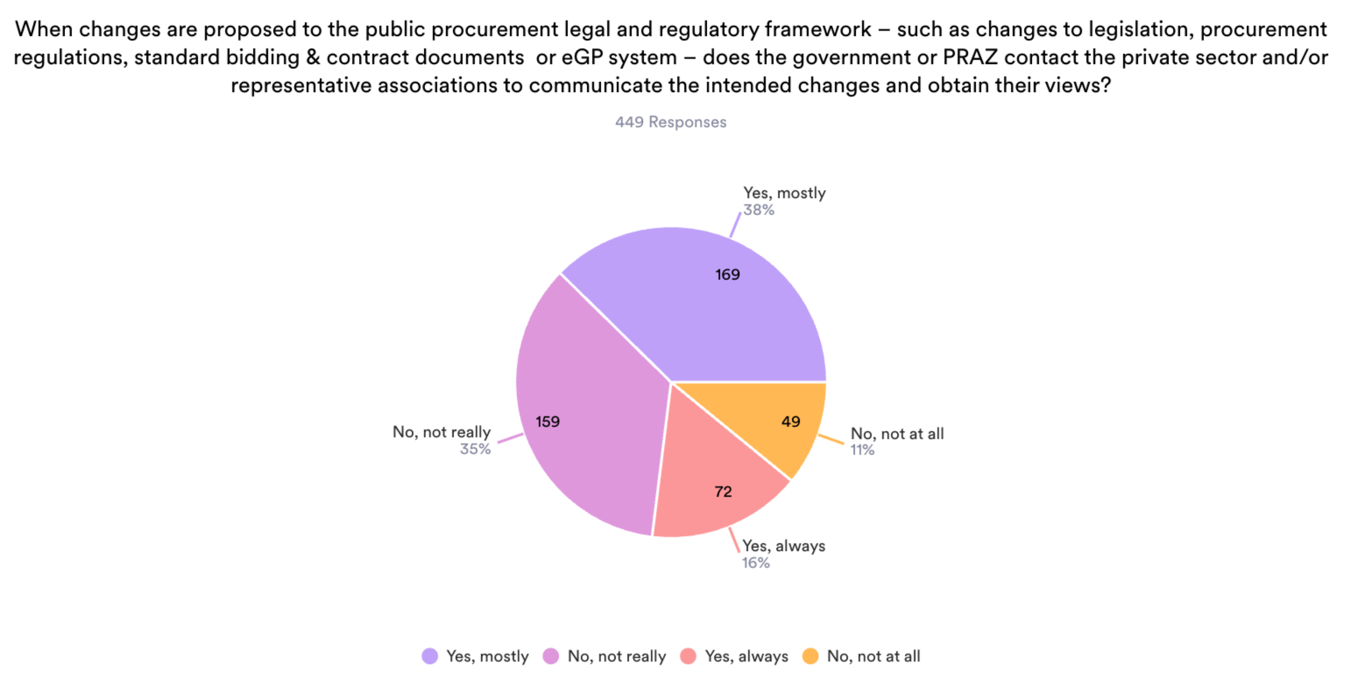
Source : https://www.facebook.com/share/p/1BeAzngoaY/?mibextid=wwXIfr

Results of the anonymous online private sector survey reveal a clear split in the experience of suppliers in terms of communication by government or PRAZ on formulation of proposed changes to the public procurement legal and regulatory framework. There were 449 responses. 54% responded that the government or PRAZ always or mostly contact the private sector and/or representative associations to communicate intended changes and obtain their views. When asked whether the engagement was open or effective the response was fairly evenly split, with 51% saying "yes" and 49% saying "no". Comments were received in both the survey and in direct discussions with stakeholders flagging the perception that consultation is a rubber-stamping exercise, with stakeholder input ignored or not implemented and without a transparent feedback process.

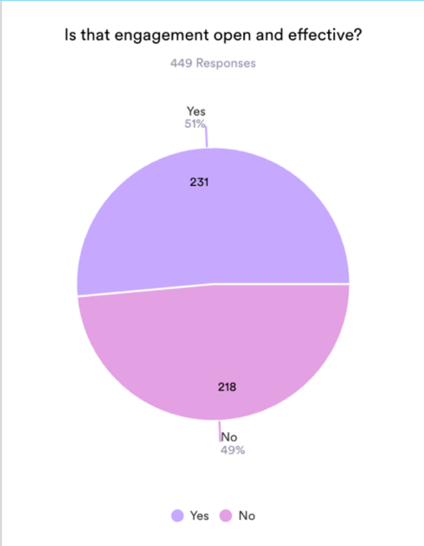
The private sector survey also explored whether and how the government/PRAZ help the private sector to keep pace with changes made to the legal and regulatory framework for public procurement. 53% of the 449 respondents agreed that the government/PRAZ help them to keep pace with those changes and 47% disagreed. When asked to explain how they learn about those changes from government/PRAZ the responses reflect the % findings with significant numbers of respondents indicating that they receive no information. Where respondents commented on information received the identified sources were mixed, including reference to the Gazette and state media as well as circulars, emails, social media posts and events (both in-person and virtual) delivered or hosted by PRAZ. Several respondents noted that they depend on procuring entities to inform them of changes.
A number commented on the need to demystify legal complexity and provide more user-friendly explanations of or training on the changes, for example, to help SMEs understand what changes introduced through statutory instruments mean in practice.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 10(a) Assessment criterion (a):*
- perception of openness and effectiveness in engaging with the private sector (in % of responses).



Source: Private Sector Survey.



Source: Private Sector Survey.

Gap analysis

There are established processes for consultation and engagement with the public, including the private sector, when formulating changes to the procurement system. There is, however, a widely held perception (49% of respondents to the private sector survey) and confirmed in direct discussions with the private sector, that engagement is not genuinely consultative, open or effective. This significantly reduces overall confidence in the consultative process.

► This Gap is assigned a Red flag because changes to the mechanisms for the Parliamentary consultation process and involvement of the Office of the Attorney General (as well as PRAZ) in formulating changes to the procurement system means that resolution of the Gap does not lie solely within the procurement sphere.

Recommendations

Implement an effective "feedback loop" – to provide feedback on the outcomes of engagement on proposed changes to the procurement system including explaining how feedback from stakeholders including the private sector has been taken on board and giving full reasons why concerns or suggestions have not been reflected in the changes.

Assessment criterion 10(a)(b):

The government has programmes to help build capacity among private companies, including for small businesses and training to help new entries into the public procurement marketplace.

Conclusion: Medium risk gap

Qualitative analysis

PRAZ organises training programmes for the supplier community and has also participated in and delivered targeted training aimed at SME and women owned businesses as well as hosting events for special interest groups on affirmative procurement. Results of the private sector survey shows a surprisingly low rate of participation by respondents in training delivered by PRAZ/Government (33%), but nearly all of those who did participate found the training to be useful and relevant or partially useful and relevant. Feedback from the private sector representatives indicates a need for more training tailored for the specific needs of very small and micro-enterprises including women-owned businesses seeking to participate in the procurement market.

PRAZ has publicised and organised/hosted training for the supplier stakeholder community, including SMEs, for example, when standard documents for Framework Agreements and SBDs were introduced. The large-scale training programme on eGP, a major focus for PRAZ in 2024, also included engagement with the private sector. There are good examples of more focussed events including training delivered by PRAZ in collaboration with the Ministry of

Women Affair, Community and SME Development in the period 2022-2025. In January 2025, PRAZ conducted affirmative procurement training aimed at special interest groups (SMEs, youths, war veterans, people living with disabilities, women owned businesses), with 205 attendees.

The Training Needs Analysis Report 2023 (TNA Report) briefly notes at s.5.1.3 identified training needs of the bidder community covering e-procurement, bid preparation, evaluation criteria, incoterms, contract clauses, complaints and appeals procedure and of the PPDPAA and understanding technical specifications. The TNA methodology included a survey question addressed to PEs asking them to identify what training needs (skills and competencies) are required for bidders. The TNA Report also notes as one of the report's limitations, the relatively small sample size of the bidding community and the use of focus group discussions including 31 bidders (various categories) to engage with the bidding community.

In response to the private sector survey question "Have you ever participated in training or capacity building or received other support from the government/PRAZ to enhance your knowledge of the public procurement system?", 67% of the 449 responses said "no". Of those who had participated in training or capacity building, 67% found the training to be useful and relevant, 32% said it was partially useful and relevant, with only 1% saying that it was not useful or relevant. The MAPS Assessment team received comments from suppliers in direct engagement forums commenting on the general nature of much of the training, including the large scale eGP training, and the need for more tailored and focussed support to ensure relevance of training particularly for very small and micro enterprises.

The Government clearly acknowledges in NDS 2 the importance of the contribution of small and micro-businesses to the economy and the need to support growth in this sector, including through business and skills training and strengthening of access to finance.[89]

Gap analysis
Training and capacity building support is not sufficiently tailored to ensure its relevance for participants, particularly for very small and micro enterprises.

Recommendations
Training and capacity building support needs to be tailored to ensure its relevance for participants, particularly for very small and micro enterprises in order to help increase MSME participation for public procurement contracts.
Engage with suppliers and potential suppliers to explore with them how their specific training and capacity building needs can best be met and build that learning into programmes rolled out to stakeholder groups.

Sub-indicator 10(b)
Private sector's organisation and access to the public procurement market

Assessment criterion 10(b)(a):
The private sector is competitive, well-organised, willing and able to participate in the competition for public procurement contracts.*

Conclusion: Medium risk gap

Qualitative analysis
Reliable data on the total number of active suppliers is currently limited, although it is clear that the informal economy and micro-enterprises constitute a substantial proportion of establishments. The need to support growth of MSMEs is acknowledged in NDS2.
The eGP system is only recently introduced. Comprehensive current and historic data on the size of registering companies and statistics on participation from the e-Bidding module is thus not available, restricting the ability to analyse bidder participation. *See analysis at 7(b)(d).*

[89] NDS 2 paragraphs 1245 to 1250.

Reliable data on the total number of active suppliers (including active registered companies) in the country is currently limited. Work is, however, well underway to collect and analyse data and provide a comprehensive statistical baseline to permit stakeholders to better understand the economic landscape of the country and facilitate evidence-based policy formulation, decision making and strategic planning. From June 2024 to March 2025, Zimbabwe National Statistics Agency (ZIMSTAT) conducted the first ever Economic Census in Zimbabwe to map and list business establishments.[90] A key finding was that a total of 204,798 establishments were found to be operational in the reference period [2023 (2024 data used for those established in 2024)] of which the majority (76.1%) were informal and 87.9% were micro enterprises. For the purposes of the Economic Census, a formal establishment is one that is registered by the Registrar of Companies, Registrar of Cooperatives, Zimbabwe Revenue Authority (ZIMRA) and National Social Security Authority (NSSA) (provided they keep records).

The Government has set an official deadline for the re-registration of companies on the country's electronic registry, with companies require to complete the re-registration process by 20 April 2026.[91] [92]The process aims to establish a new and updated register of companies and private business corporations while removing defunct or inactive entities from the registry.

As noted at 10(a)(b), the Government clearly acknowledges in NDS2 the importance of the contribution of small and micro-businesses to the economy and the need to support growth in this sector.[93]

International competition is mandated for contracts above the following thresholds: Construction works > 5 million USD; Goods > 300,000 USD; Consultancy and non-consultancy services > USD 200,000.[94]
Procuring entities have the option to invite only Zimbabwean (domestic) suppliers to bid for contracts within the following financial envelopes: Construction works 20,000 > USD ≤ 5 million; Goods 10,000 > USD ≤ 300,000; Consultancy and non-consultancy services 5,000 > USD ≤ 200,000.[95]

Quantitative analysis

* Recommended quantitative indicator to substantiate assessment of sub-indicator 10(b) Assessment criterion (a):
• **number of registered suppliers as a share of total number of suppliers in the country** (in %)
Data not available

• **share of registered suppliers that are participants and awarded contracts** (in % of total number of registered suppliers).
Data not available.

• **total number and value of contracts awarded to domestic/foreign firms** (and in % of total)
Data not available – see note below.
Data not available.

Current reporting does not disaggregate contract awards by ownership origin (i.e. separately identifying domestic and foreign firms). However, the M&E team captures the value of contracts awarded through processes open to

[90] Preliminary Report of the 2023 Economic Census, Zimbabwe National Statistics Agency, July 2025. https://zimstat.co.zw/economic-census-preliminary-report/
[91] SI 108 of 2025 Companies and Other Business Entities (Re-Registration) Regulations https://www.veritaszim.net/sites/veritas_d/files/SI%202025-108%20Companies%20and%20Other%20Business%20Entities%20%28Re-Registration%29%20Regulations%2C%202025.pdf2025.
[92] https://bulawayo24.com/index-id-news-sc-national-byo-260615.html

[93] NDS 2 paragraphs 1245 to 1250.
[94] PPDPA Regs R.10(3).
[95] PPDPA Regs R.10(4).

domestic-only bidders and processes open to both domestic and foreign bidders. Analysis shows that the value of contracts accessible to foreign bidders consistently accounts for less than a quarter of total procurement (see below).

	Contracts with Domestic-Only Participation		**Contracts with Domestic and foreign Participation**	
Year	**Total Value (in USD)**	Share	**Total Value (in USD)**	Share
2025	1.8B	75%	574.3M	25%
2024	7.6B	91%	749.6M	9%
2023	4.7B	84%	910.6M	16%
2022	2.3B	93%	162.2M	7%

Source: PRAZ M&E reports

The PRAZ M&E quarterly reports also capture data on bidder origins in cases considered by SPOC. In 2025, this data recorded 77 international bidders and 4850 domestic bidders participating in cases considered by SPOC indicating low levels of participation by international bidders.[96]

Gap analysis
The lack of reliable comprehensive data at national level and limits on available data from the eGP system, due to its recent introduction means that it is not currently possible to confidently and accurately assess the overall capacity of the private sector to respond to public procurement.

Recommendations
Review eGP system records of bidder registration to ensure that supplier category is consistently and accurately recorded to deliver useable data for market analysis.
See also, recommendations at 7(b)(d) on eGP system enhancements to capture bidder participation data and supplier company in a structured manner.

Assessment criterion 10(b)(b):
There are no major systemic constraints inhibiting private sector access to the public procurement market.

Conclusion: High risk gap + red flag

Qualitative analysis
The Private Sector Survey confirmed the existence of a number of systemic constraints which were also identified by private sector representatives in direct discussions with the MAPS Assessment team. Most notable are:
Procurement methods: 47% of respondents are of the view that procurement methods are “sometimes” proportionate to the risk and value of the procurement and 10% are of the view that procurement methods are “never” proportionate to the risk and value of the procurement. *See analysis Gaps and Recommendations at 1(b)(d) to review legal provisions on available procurement methods*.
Contract documents: Although the majority of respondents (64%) confirmed that the contract documents are always or often clear, easy to understand and fit for purpose, a significant minority (47%) were of the view that contract provisions “sometimes” or “never” fairly allocate risks associated with performance.
Post contract value for money (VfM) reviews: Private sector representative raised concerns with the MAPS Assessment team about the increased use by PEs of post-contract value for money reviews. The MAPS Assessment team understands that some PEs undertake VfM reviews and when they conclude that tendered prices were unreasonable, they may demand a reduction in prices, even after contract signature and delivery, thus seeking to

[96] Source: PRAZ Quarterly Report for Q.4 2025.

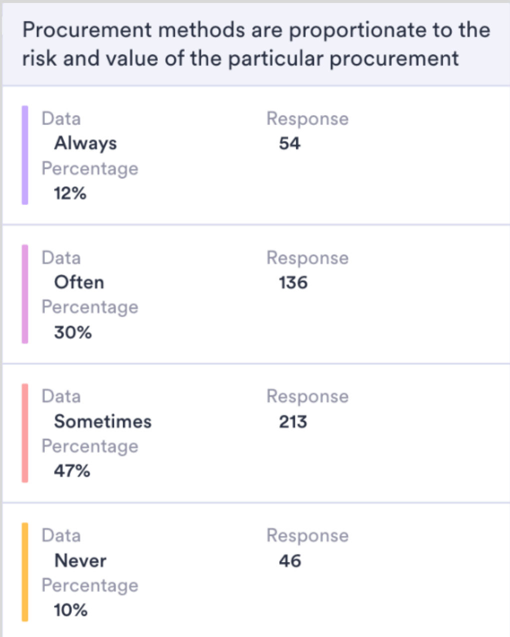
reallocate risk associated with contract performance. NDS2 states at paragraph 279, in the context of the section on Settlement of Arrears: "Contract renegotiation will be considered in cases where terms are unsustainable, or delivery was made outside approved budget provisions. Where appropriate, arrears may be restructured or converted into medium-term payment plans or other settlement instruments."

Limited access to finance (Also flagged as a potential barrier to entry under 1(d)(b)): Only 17% of respondents are of the view that it is easy to access finance controlled by the government. Access to private financing was also identified in discussion as a problem for suppliers to government, with macro-fiscal issues and delays in payment under government contracts negatively affecting cash flow. [97] *[See note on macro-fiscal issues including the impact of high inflation, currency instability and multi-currency system on public procurement at Economic Overview in Volume 1 of this Report and analysis and Gap at 4(b)(b) on payment of invoices]]*

Fees for registration and participation *see analysis, Gap and Recommendations at 1(d)(b).*

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 10(b) Assessment criterion (b):*
- perception of firms on the appropriateness of conditions in the public procurement market (in % of responses).
Source for findings below: Private Sector Survey – 449 responses.



[97] Feedback from suppliers/representatives in direct engagement and in MAPS Private Sector Survey. *See also, analysis at 4(b)(b) on Invoicing and payment.*

Contract documents are clear, easy to understand, relevant and fit for purpose

Data	Response	Percentage
Always	129	29%
Often	158	35%
Sometimes	149	33%
Never	13	3%

Contract provisions fairly allocate risks associate with contract performance

Data	Response	Percentage
Always	79	18%
Often	158	35%
Sometimes	172	38%
Never	40	9%

The costs of registration as a supplier/contractor/consultant are reasonable and affordable

Data	Response	Percentage
YES	257	57%
NO	192	43%

The costs of participation in a procurement process are reasonable and affordable

Data	Response	Percentage
YES	157	35%
NO	292	65%

Gap analysis

There are a number of systemic constraints which inhibit private sector access to and appetite for the public procurement market, including access to financing (both government supported and privately sourced), the costs of registration as suppliers to the public sector and participation in the procurement process, inappropriate choice of procurement methods and risk allocation in contracts and significant delays in payments under government contracts. Post-contract VfM reviews create commercial uncertainty, further undermining the public sector contract landscape.

► This Gap is assigned a Red flag because remedial action in respect of measures to improve access to government and private financing of businesses lies beyond the sphere of public procurement (see 1(d)(b)). Remedying delays in payment under government contracts requires improvements in PFM Treasury management processes and practices (see 4(b)(b)) and are not limited to changes within procurement. Use of VfM reviews by PEs is endorsed at national level, with discontinuance potentially requiring policy change..

Recommendations

Consider undertaking a critical study to fully identify and assess systemic constraints inhibiting private sector access to the procurement market with the aim of identifying practical solutions to increase appetite to participate in public procurement processes and enhance levels of participation. Discontinue the use of post-contract value-for-money

(VfM) reviews. Such reviews should be considered during the evaluation stage. To mitigate the commercial risks, incorporate robust price adjustment formulae in contract terms.

See also, analysis, Gaps and Recommendations at 1(b)(d) on choice of procurement methods.

Sub-indicator 10(c)
Key sectors and sector strategies

Assessment criterion 10(c)(a):
Key sectors associated with the public procurement market are identified by the government.

Conclusion: No gap

Qualitative analysis
The Government has published two comprehensive National Development Strategies spanning the period 2021 to 2030. National Development Strategy 2021-2025 (NDS1) and National Development Strategy 2026-2030 (NDS2) have both identified a number of key sectors which are associated with the public procurement market, for priority development. NDS1 flagged in particular, the pharmaceutical sector with reference to the revised Sector Development Strategy for Pharmaceutical Manufacturing in Zimbabwe 2017-2022 which includes promotion of public procurement of locally produced medicines. Enhancing competitiveness through SME participation, local content strategy and promotion of domestic production were highlighted, with specific reference to enhancing the domestic value chains in a number of sectors.[98] NDS2 continues the focus on pharmaceuticals and medical supplies (see 10(c)b)) and confirms the need to continue to support domestic value chains.

Gap analysis

Recommendations

Assessment criterion 10(c)(b):
Risks associated with certain sectors and opportunities to influence sector markets are assessed by the government, and sector market participants are engaged in support of procurement policy objectives.

Conclusion: No gap

Qualitative analysis
NDS2 explicitly acknowledges the opportunities that public procurement presents to influence sector markets: "Recognising that Government is the single largest buyer of goods and services in the country, NDS 2 will strategically leverage public procurement to facilitated industrialisation of key value chains and create jobs."[99]
It also confirms that the Government will strength the local content and procurement frameworks to prioritise local sourcing "using the Government's significant purchasing power to create a stable, large market for local manufacturers."[100] (see analysis of local content/domestic preference provisions at 1(d(b)).

The ongoing development strategy for development of the pharmaceutical industry illustrates how risks associated with the sector have been identified and measures are being taken to engage with market participants – including a cross ministry meeting in 2024/25 with suppliers and manufacturers - in support of national policy objectives aimed at "strengthening local pharmaceutical manufacturing to enhance national health security, reduce import dependence and promote self-sufficiency in essential medicines and medical supplies." [101]
The procurement of locally manufactures uniforms for the armed forces is also proposed in NDS 2 to support national objectives to promote domestic industry, protect jobs in the cotton-to-clothing value chain and strengthen technical and design capabilities in partnership with tertiary institutions. [102]

[98] Including, for example, leather; agro-processing; engineering, iron and steel; plastic waste, and buses and truck assembly.
[99] NDS 2, paragraph 487
[100] NDS 2, paragraphs 481 to 491
[101] NDS 2, paragraphs 555 to 565 Pharmaceuticals and Medical Supplies.
[102] NDS 2, paragraphs 570 to 575 Cotton to Clothing.

Market sector risk analysis has also been undertaken in order to prepare the National Standardised Price List which, when published, will provide a guideline for decision makers at PEs on USD market prices for 42 commonly procured goods and services. The National Standardised Price List has been prepared in the wake of experience from the COVID-19 pandemic when pricing abuse was observed (as in many other countries) in particular in relation to personal protective equipment. PRAZ, ZIMSTAT and the National Competitiveness Commission created a task force, supported by Treasury funding, to pool their expertise in the preparation of the National Standardised Price List. It is envisaged that there could be a link to the eGP system so that a flag is raised for PEs when an item they wish to procure is on the National Standardised Price List.[103] Items in the National Standardised Price List are expected to include motor vehicles, construction materials, information communication technology gadgets and accessories.[104]
Gap analysis
Recommendations

[103] Information in this paragraph provided to MAPS Assessment Team in discussions with PRAZ, December 2025. See also, PRAZ Annual Report 2024, page 31.

[104] 2025 National Budget Statement, 28 November 2024, paragraph 243.

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Indicator 11. Transparency and civil society engagement strengthen integrity in public procurement

<table>
<tr><th>Sub-indicator 11(a)
Enabling environment for public consultation and monitoring</th></tr>
<tr><td>Assessment criterion 11(a)(a):
A transparent and consultative process with civil society is followed when formulating changes to the public procurement system.</td></tr>
<tr><td>Conclusion: Medium risk gap</td></tr>
<tr><td>Qualitative analysis
See analysis at 10(a) describing the Constitutional requirement for consultation on Bills being considered by Parliament and consultations conducted in 2025 on proposed amendments to the PPDPAA.

The MAPS Assessment CSO survey launched in August 2025 (after the Parliamentary consultations referred to above) asked respondents “When changes are proposed to the public procurement legal and regulatory framework, does the government or PRAZ contact civil society organisations (CSOs)/citizens to communication the intended changes and obtain their views? 60% responded “no, not at all” or “no, not really”. This is consistent with findings from discussions between the MAPS Assessment team and CSO representatives with direct interest in public procurement issues. A minority of organisations confirmed that they had been invited to contribute to discussions on changes to the public procurement system. Other CSOs commented, in discussions or in response to the CSO survey, on the need for proactive direct contact and engagement with a more diverse group of civil society organisations in respect of both legislative and non-legislative changes to the public procurement system.</td></tr>
<tr><td>Gap analysis
A consultative process for changes to the PPDPAA has been conducted but it appears that the reach of the consultation is insufficient, as CSOs with an interest in public procurement issues have not been directly invited to participate, thus losing the opportunity to make contributions to the process. Some interested CSOs are also missing out on the chance to discuss the impact of proposed non-legislative changes and make suggestions for improvement so that changes reflect the interests of the CSO community and their role in observing and monitoring the procurement system and processes.</td></tr>
<tr><td>Recommendations
Engage with CSO stakeholder community to (1) establish a full list of CSOs with an interest in public procurement issues, to be kept under regular review (2) agree the most effective measures for engagement with those CSOs and implement those measures.
See also 10(a)(a) on analysis of public consultation when formulating changes to the public procurement, which includes CSOs and 11(a)(c) on the extent to which feedback from CSOs is taken into account</td></tr>
<tr><td>Assessment criterion 11(a)(b):
Programmes are in place to build the capacity of relevant civil society stakeholders to understand, monitor and improve public procurement.</td></tr>
<tr><td>Conclusion: Medium risk gap</td></tr>
<tr><td>Qualitative analysis
There are good examples of PRAZ-led engagement, including with civil society stakeholders, to communicate understanding and knowledge of public procurement.

PRAZ has a strong presence at national and local events to engage with stakeholders (including civils society and businesses) on public procurement related issues. Just a few examples from 2025 include the Zimbabwe Agricultural</td></tr>
</table>

Show, Zimbabwe International Trade Fair, Community Engagements in Chatikobo and Muzarabani, Business Times Annual Telecommunications Conference, Matabeleland North Provincial Business Expo.[105] In September 2025, PRAZ hosted its 2nd National Media Training Workshop, held in Kadoma, with representatives of radio, television, online and print media to foster transparency, accountability and informed journalism.
Gap analysis The MAPS Assessment team was unable to find evidence of well established, permanent and ongoing programmes focussed on building the capacity of relevant civil society stakeholders specifically aimed as facilitating CSOs to monitor and improve public procurement. This hinders the ability of civil society to contribute to enhanced accountability and positives improvements in the public procurement system. The introduction of eGP and resulting increase in publicly available data presents an excellent opportunity for tailored capacity building in this sphere.
Recommendations The introduction of eGP and resulting increase in publicly available data presents an excellent opportunity for tailored capacity building for civil society stakeholders. In order to be of real value particularly to promote the monitoring role for civil society, training will need to be conducted on how to access and interrogate available data through the eGP system. Training on how to use the eGP for monitoring purposes will need to be underpinned by capacity building for civil society which results in a clear overview and understanding of procurement planning, purchasing and contract delivery processes.
Assessment criterion 11(a)(c): There is ample evidence that the government takes into account the input, comments and feedback received from civil society.
Conclusion: High risk gap + red flag
Qualitative analysis Discussions between the MAPS Assessment team with civil society representatives flagged the need for improved transparency and more meaningful and inclusive ongoing engagement with civil society when formulating changes to the public procurement system. There was also the perception that citizen input is not always welcomed or valued and that citizens responses on consultations are ignored, particularly in the context of Parliamentary public hearings.[106] The legal community also flagged concerns about the tight timelines they have experienced for responding to consultations which do not allow sufficient time for careful deliberation. The concerns expressed were reflected in the results of the MAPS Assessment CSO survey where 70% of respondents were of the view that engagement was not “open and effective” and government/PRAZ’s response to feedback is “never” or “rarely” responsive in the view of 40% of the respondents.
Gap analysis There is a lack of evidence to demonstrate that the government takes into account the input, comments and feedback from civil society. There is a strong perception that engagement with civil society is not open and effective. These failures may result in reduced levels of participation by civil society in the procurement sphere. ► This Gap is assigned a Red flag because changes to the mechanisms for the Parliamentary consultation process and involvement of the Office of the Attorney General (as well as PRAZ) in formulating changes to the procurement system means that resolution of the Gap does not lie solely within the procurement sphere.

[105] Source: PRAZ Facebook Page
[106] This is consistent with findings in other contexts, such as in the 2024 Report on the State of Civic Space which reported that the approach used to develop the Private and Voluntary Organisations Amendment Bill (signed into law in April 2025) was “top-down without meaningful consultation in the NGO sector”
https://www.fidh.org/IMG/pdf/2024_state_of_civic_space_report_expanded_version.pdf

Recommendations Implement an effective "feedback loop" – to provide feedback on the outcomes of engagement on proposed changes to the procurement system including explaining how feedback from CSOs has been taken on board and giving full reasons why concerns or suggestions have not been reflected in the changes. *See also 11(a)(a).*
Sub-indicator 11(b) **Adequate and timely access to information by the public**
Assessment criterion 11(b)(a): Requirements in combination with actual practices ensure that all stakeholders have adequate and timely access to information as a precondition for effective participation.
Conclusion: High risk gap
Qualitative analysis **Information on legal and regulatory framework:** As noted at 1(a)(d), 2(a)(a) and 7(a)(a), the PPDPAA, some circulars, PRAZ procurement manual, technical guidelines and instructions and bidding documents are available online and can be downloaded at no cost from the PRAZ website. However, the information available to download from the PRAZ website is incomplete: neither the PPDPA Regulations, nor amendments to the PPDPPA or a complete collection of updated circulars are available. **Information on planned procurements:** With the introduction of eGP and requirement on procuring entities to publish Annual Procurement Plans and amendments to those plans on the eGP system, information about planned procurements is now publicly available. *(See analysis at 7(a)(c)).* **Information on specific procurements:** The introduction of eGP has increased publicly available information in respect of competitive procurement processes, although information on individual procurement processes remains limited pending full adoption of eGP for all stages of the procurement process. (*See analysis at 7(a)).*
Gap analysis Incomplete information on the legal and regulatory framework and, in particular, data on specific procurements hinders effective participation of civil society to ensure accountability and visibility of the flow of public funds.
Recommendations Implement recommendations at 1(a)(d), 2(a)(a) and 7(a) to ensure that all laws, regulations and policies are published and easily accessible to the public at no cost. Implement recommendations on roll out of eGP system and eGP data at 7(a), to ensure that all stakeholders have adequate and timely access to information in each phase of the public procurement process related to specific procurements.
Sub-indicator 11(c) **Direct engagement of civil society**
Assessment criterion 11(c)(a): The legal/regulatory and policy framework allows citizens to participate in the following phases of a procurement process, as appropriate: • the planning phase (consultation) • bid/proposal opening (observation) • evaluation and contract award (observation), when appropriate, according to local law • contract management and completion (monitoring).
Conclusion: Medium risk gap

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Qualitative analysis **Consultation:** Civil society participation in the planning phase for procurement is not specifically prescribed in the procurement legal/regulatory framework. **Observation:** Civil society monitoring of bid submission, receipt and opening is not specifically prescribed in the procurement legal/regulatory framework. The PPDPAA provides that the opening of bids shall be conducted in public (PPDPAA S.46). (See analysis at 9(b)(d)). However, public participation is now only applicable to bids submitted in hard copy, a procedural shift necessitated by the introduction and adoption of the electronic Government Procurement (eGP) system. (See analysis at 9(b)(d)). **Monitoring:** Civil society monitoring of contract management and completion is not specifically prescribed in the procurement legal/regulatory framework.
Gap analysis The procurement legal and regulatory framework does not require or make specific allowance for citizen participation in the planning (consultation), observation or monitoring of a procurement process. This minimises the opportunities for citizen-driven calls for accountability and limits transparency in specific procurement processes.
Recommendations Combined recommendations for 11(c)(a) and 11(c)(b). Consider including provisions in the procurement legal and regulatory framework to facilitate citizen participation in procurement planning, processes and contract monitoring. It may be appropriate in some cases, such as large-scale or environmentally or socially sensitive procurements, to mandate citizen participation at specified stages of a project including for example, during the planning stages or to undertake social audit. Targeted capacity building will be required to support these processes.
Assessment criterion 11(c)(b): There is ample evidence for direct participation of citizens in procurement processes through consultation, observation and monitoring.
Conclusion: Medium risk gap
Qualitative analysis Direct participation of citizens in procurement processes is not mandated in the legal/regulatory framework and is limited. Citizen involvement is not incorporated as standard practice for procuring entities when planning and conducting procurement or for monitoring of contract delivery. In two rounds of direct discussions with CSO representatives, the MAPS Assessment team asked about their knowledge and experience of direct citizen participation in public procurement processes. CSO representatives confirmed that there are a few examples of citizen participation, particularly at the planning stage for major infrastructure projects. This is reflected in the results of the MAPS Assessment CSO survey where 40% of the respondents confirmed that, in their experience, procuring entities often or sometimes seek CSO/citizens views at the planning phase of projects (it should be noted that the number of total responses was 10 and this needs to be taken into account in interpreting the results of the survey). There are also examples of CSO facilitated engagement between communities and local authorities on larger scale externally funded development programmes.[107] Helpful feedback from CSO representative in direct discussions with the MAPS Assessment team and in comments section of the CSO survey flagged the need for (amongst other things): a structured platform for CSOs and citizens

[107] For example, projects funded by wvi: https://www.wvi.org/zimbabwe

to provide input to procurement processes; awareness campaigns to educate citizens about the importance of their role in public procurement and benefits of participation; fostering partnerships to leverage resources, expertise and experience in improving public procurement processes, and; targeted capacity building to support these engagement activities.

Analysis of sampled procurement files showed no evidence of civil society involvement in any of the sampled files during the planning phase, bid/proposal opening, evaluation and contract award or in the monitoring of contract implementation. (see 9(c)(f)).

Gap analysis
There is limited evidence of direct participation of citizens in procurement processes, and this is not standard practice.
(see 11(c)(a))

Recommendations
See 11(c)(a).

Indicator 12. The country has effective control and audit systems

Sub-indicator 12(a)
Legal framework, organisation and procedures of the control system
The system in the country provides for:

Assessment criterion 12(a)(a):
laws and regulations that establish a comprehensive control framework, including internal controls, internal audits, external audits and oversight by legal bodies

Conclusion: No gap

Qualitative analysis
The Constitution, laws and regulations establish a comprehensive financial control framework covering both internal controls and internal audit as well as independent external audits by the Auditor-General or qualified external auditors (as appropriate) and for Parliamentary oversight.[108]

The Constitution sets out basic values and principles covering public administration in all tiers of government including institutions and agencies of the state, government-controlled entities and other public enterprises (S.194). S.298 of the Constitution sets out principles of public financial management and S.299 provides for Parliamentary oversight of State revenues and expenditure, a role which is undertaken by the Public Accounts Committee. Section 309 of the Constitution mandates the office of Auditor-General (external audit) whose role and activities are further described in the Audit Office Act.

PFMA, PFM Regs. and Treasury Instructions, set out a framework for internal audit and provide for the establishment of audit committees and the Central Internal Audit Unit. PFMA S.4(1) provides that the PFMA applies to Ministries, designated corporate bodies and public entities, constitutional entities, statutory funds and the Office of the President and Cabinet. A “public entity” for the purposes of the PFMA includes: a corporate body established by or in terms of any Act for special purpose, thus covering many parastatals; companies in which the State has a controlling interest; a local authority including municipal, town, rural district council or local board.

[108] See analysis at 4(a), (b) & (c)) for assessment of effectiveness of expenditure commitment controls.

The Public Entities Corporate Governance Act (PECOG) requires public entities, including state-owned enterprises and parastatals which are procuring entities subject to the PPDPAA, to establish an audit committee supported by an internal audit unit, to provide assurance on internal controls, risk management and governance processes. PRAZ also fulfils a procurement-specific oversight role pursuant to its monitoring and supervisory functions provided for in the PPDPAA. The Public Finance Reform Strategy 2021-2025 (PFMRS) included priority reform measures covering both internal and external audit as well as Parliamentary oversight.[109] Progress of the PFMRS was reviewed in 2024 in the Public Finance Management Reform Strategy 2021-2025, Interim Review Report (PFMRS Interim Review).[110] National Development Strategy 2 (NDS2)[111] reflects a number of these recommendations with particular reference to strengthening internal audit and the oversight role of external audit. Compliance monitoring (audit) by PRAZ and oversight by the Special Procurement Oversight Committee (SPOC): PRAZ undertakes ongoing compliance monitoring of PE activities based on monthly procurement returns submitted by PEs, providing PEs with regular (quarterly) feedback reports as well as contract monitoring compliance reviews. PRAZ has also implemented a system of compliance reviews of individual procuring entities which includes assessment of conduct of procurement, performance sampling and contract scrutiny. *See analysis at 8(c)(a).* PPDPAA S.54 provides for the establishment and operation of the Special Procurement Oversight Committee (SPOC). Members of SPOC are the Attorney-General, Accountant-General and Chief Director of Public Works who scrutinise requests on a weekly basis. Secretariat services are provided by the Operations Division of PRAZ. In summary, SPOC scrutinises conformity with relevant processes, procedures and formalities required under the PPDPAA and PFMA leading to the proposed award of especially sensitive, especially valuable[112] and exempted contracts. It also scrutinises the establishment of framework agreements. Scrutiny by SPOC also includes assessment of: correct use of advertisement; neutrality of specifications; level of competition; sustainability considerations and value for money outcomes. SPOC review is undertaken as soon as possible after bid evaluation and before acceptance. SPOC may reject a contract due to lack of information or documents. SPOC has powers to certify and recommend award of a contract submitted for scrutiny. It may also refer back to the PE for corrective actions, cancel procurement proceedings or order PRAZ to investigate a proposed award. Bidders pay the SPOC review fee in advance on a sliding scale of USD 150 to USD 500. *(See summary fees table at 1(d)(b)).* In 2025, SPOC reviewed 1,254 cases, an increase from 924 in 2024.[113] Data from SPOC reviews is compiled as part of the Quarterly Stakeholder reports.
Gap analysis
Recommendations
Assessment criterion 12(a)(b): internal control/audit mechanisms and functions that ensure appropriate oversight of procurement, including reporting to management on compliance, effectiveness and efficiency of procurement operations
Conclusion: High risk gap + red flag

[109] See, in particular, PFMRS s.4.4 Internal Auditing, s.6.1 External Audit and s.6.2 Parliament and the Parliamentary Budget Office.

[110] Public Finance Management Reform Strategy 2021-2025, Interim Review Report, on behalf of the MoFEDIP, December 2024.

[111] Republic of Zimbabwe, National Development Strategy 2, January 2026 – December 2030, 27 November 2025.

[112] PPDPA Regulations s.10(2)/Second Schedule Financial Thresholds for SPOC Scrutiny: Class A: USD 2m + low risk profile/lower procurement budget; Class B: USD 500K +risk profile conditions; Class C: up to USD 500K and risk profile condition.

[113] Sources: PRAZ Annual Report 2024, page 41 and PRAZ Quarterly Reports 2024/2025.

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Qualitative analysis

There is a legal/regulatory framework providing for oversight of procurement through internal control/audit inspection and reporting mechanisms and functions and a system for internal audit committees whose role includes review of internal audit findings and recommending appropriate actions to be taken by the responsible authorities. The structural set up for internal audit is under development and in a transition phase. In practice, however, general budget constraints mean that the internal audit function is likely to be constrained in terms of the execution of audit plans and the audit committee system is not yet fully functional.

Internal Audit

PFMA S.44(1)(a) General responsibilities of accounting authorities, requires an accounting authority for a public entity to ensure that the public entity establishes and maintains "a system of internal audit under the control and direction of an audit committee…" as well as "an appropriate procurement and provisioning system which is fair, equitable, transparent, competitive and cost-effective." PFMA s.80 Internal auditors, lists the functions of an internal auditor which includes monitoring of procurement operations. There are provisions requiring internal auditors to have free access to records, books, documents etc, and right to request explanations and information as well as requirements as to reporting of findings. Public Finance Management (General) Regulations 2019[114] (PFM Regs.)[115] Part X Internal Audit and Internal Controls include detailed provisions on internal controls and the internal audit function.

All MDAs have active internal audit units which vary in size, according to the size and activities of the MDA.[116] The Public Service Commission (PSC) is the appointing authority for internal auditors in MDAs.[117] Internal audit is decentralised and internal auditors remain within the individual Ministries, unlike accountancy professionals who may move between ministries and fall within the control of the Accountant General.

Numbers of auditors within MDAs on 01 November 2025 are shown below.

Auditor posts within MDAs on 01 November 2025		
	Establishment	Filled posts
Total number	*230*	*165*
Breakdown by job title		
Director, Audit	22	18
Deputy Director, Audit	19	15
Auditors	189	132

Source: Based on data provided by Public Service Commission, December 2025.

PFMRS identifies the need to grant financial independence to internal auditors to allow for adequate funding of their internal audit plans.[118] PFMRS Interim Review notes that the legislative framework for the MDA internal audit function has not yet been amended, hindering independence and effectiveness.[119]

Public Entities Corporate Governance Act (PECOG) applies to public entities as defined by that Act, including state-owned enterprises and parastatals which are procuring entities subject to the PPDPAA (see analysis at 6(a) for definition of procuring entities and exemptions from application of the PPDPAA). PECOG S.226 provides that the "Board must ensure that there is a continuous and effective risk and results-based internal audit". Internal audit

[114] Public Finance Management (General) Regulations [CAP.22:19] SI 135 of 2019 https://www.veritaszim.net/sites/veritas_d/files/SI%202019%20-%20135%20Public%20Finance%20Management%20%28General%29%20Regulations%2C%202019.pdf

[115] PFM Regs. apply to Ministries, Public Entities and Constitutional Entities.

[116] Confirmed in MAPS Assessment Team meeting with MOFEDIP Central Internal Audit Unit, November 2025.

[117] PFM Regs R.50(4) Internal controls and internal audit.

[118] PFMRS, page 31 references a lack of independence of the internal audit function which may negatively affect allocation of resources for internal auditors due to the reporting line for the Chief Audit Executive to the Accounting Officer.

[119] PFMRS Interim Review, paragraph 4.3.3 Areas of Limited or No Progress.

function: PECOG S.223 requires the Audit Committee to be assisted by a "competent internal audit unit to provide assurance on internal controls, risk management and governance processes in accordance with the standards of Professional Practice of Internal Audit."

Audit Committees: PFMA s.84 Audit Committees, requires every Ministry, statutory fund, constitutional entity and public entity to establish an audit committee. The responsibilities of the audit committee are set out at PFMA s.84 as follows: "(a) to review internal controls, including the scope of the internal audit programme, and the internal audit findings, and to recommend appropriate action to be taken by the responsible authorities; (b) to ensure that accounts, are prepared in a timely and accurate manner and to ensure the prompt publication of the annual accounts; (c) to review with the Auditor-General or other external auditors, as may be appropriate, the scope of their audit plan, the system of internal audit reports and assistance given by officers or staff to the auditors and any findings and action to be taken in connection therewith." The definition of "public entity" in this context includes corporate bodies established under any Act of Parliament and state-controlled companies. PECOG ss.223 to 233 Internal Audit Function, Methodology and Mandate sets out principles and recommendations for internal audit. Audit Committee: PECOG s.92 lists "essential committees" (Board committees) which include an Audit Committee and a Risk Committee.

In practice not all Audit Committees are properly constituted or fully capacitated to fulfil their functions. According to the PFMRS Interim Review, "the reconstitutions and capacitation of Audit Committees have …seen limited progress, with several MDA Audit Committees not properly constituted in 2023." This remains the case, with Audit Committees often remaining an internal function with only internal executives from MDAs as the board members which is not in line with legislative provisions.[120] According to the CIAU (see below), currently about half of MDA Audit Committees are meeting but CIAU has noted that they are not following through on issues raised at meetings and Central IAU making working visits and advises that training is necessary for audit committees particularly when they have external members.
NDS2 paragraph 274 provides that "Internal audit and monitoring functions will be strengthened to detect and address non-compliance with expenditure controls. Regular arrears monitoring reports will be produced and submitted to Cabinet for enforcement."

The structure of internal audit is under development and in a transition phase. The **Central Internal Audit Unit (CIAU)** housed under the MOFEDIP was established in 2020 to provide support in the governance and activities of internal audit and audit committees. The CIAU currently has 2 departments: (1) Governance risk and compliance and (2) Audit assurance and advisory services responsible for training, policies, regulations. The total headcount of the CIAU as of 05 November 2025 was 38, with recruitment underway to fill posts for the compliance function. Amendment to the legislative framework for the MDA internal audit function and the CIAU are required to promote their independence and effectiveness. Discussions have been ongoing on the creation of the Zimbabwe Internal Audit Agency but according to the PFMRS Interim Review[121]the principles of an establishment Act have not yet gone to Cabinet.[122]

Gap analysis
General budget constraints mean that the internal audit function is likely to be constrained in terms of the execution of audit plans and the audit committee system is not yet fully functional, reducing transparency and accountability.
► This Gap is assigned a Red flag because changes required to resolve this gap require actions in relation to the internal audit function and operation of the audit committee system and thus lie outside the procurement sphere.

[120] PFMRS Interim Review, paragraph 4.3.3 Areas of Limited or No Progress and MAPS Assessment Team discussion with CIAU, November 2025.
[121] Public Finance Management Reform Strategy 2021-2025, Interim Review Report, on behalf of the MoFEDIP, December 2024
[122] PFMRS Interim Review, paragraph 4.3.3 Areas of Limited or No Progress

Recommendations Strengthen internal audit and monitoring functions to detect and address non-compliance with expenditure controls, in line with NDS2. *See also, recommendations at 12(d)(a) on training for internal auditors*. Prioritise the proper constitution and capacitation of Audit Committees for all PEs.
Assessment criterion 12(a)(c): internal control mechanisms that ensure a proper balance between timely and efficient decision-making and adequate risk mitigation
Conclusion: No gap
Qualitative analysis The regulatory framework provides for a risk-based approach to internal audit and control mechanisms. PFM Regs. R.50 Internal Controls and Internal Audit, requires conduct of a risk assessment at least annually, the preparation of a risk management strategy, which includes a fraud and prevention plan. The risk management strategy is used "to set internal audit priorities and to determine any changes to systems, processes, practices and staff skills to improve controls and to manage risks." SI 135 of 2019, Public Finance Management (General) Regulations, S.50 mandates MDAs to adopt risk management. In January 2023 the MOFEDIP released the Risk Management Framework and Guidelines [123] to support implementation of a risk management approach. MDAs are expected to observe those guidelines in order to embed risk management into operations. PECOG S.223 requires the Audit Committee to be assisted by a "competent internal audit unit to provide assurance on internal controls, risk management and governance processes in accordance with the standards of Professional Practice of Internal Audit.". PECOG S.231 recommends that the internal audit activity should adhere to the International Internal Auditing Standards (IIAS) and Code of Ethics. PECOG S.226 provides that the "Board must ensure that there is a continuous and effective risk and results-based internal audit."[124] *See analysis and gap at indicator 4(a)(b) on lack of effective PFM commitment control mechanisms.*
Gap analysis
Recommendations
Assessment criterion 12(a)(d): independent external audits provided by the country's Supreme Audit Institution (SAI) that ensure appropriate oversight of the procurement function based on periodic risk assessments and controls tailored to risk management
Conclusion: No gap
Qualitative analysis Zimbabwe's Supreme Audit Institution is the Office of the Auditor-General (OAG) which has a constitutional mandate to audit the accounts, financial systems and financial management of all departments, institutions and agencies of government, all provincial and metropolitan councils and all local authorities. The OAG carries out annual external audits using a risk-based approach. The Constitution provides for institutional independence of the OAG, but that independence is constrained by funding and resource issues.

[123] Republic of Zimbabwe, Risk Management Framework and Guidelines for the Public Sector, MOFEDIP, January 2023. https://www.cut.ac.zw/risk/assets/files/risk-framework.pdf

[124] PECOG Chapter 4 Governance of Risk, sets out risk management principles, requires public entities to have a risk management policy and plan and to perform regular risk assessments and monitoring. The Board is required to have a Risk Committee whose responsibilities must be set out clearly in its terms of reference.

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Audit Office Act s.106 requires annual auditing of public accounts. The Constitution of Zimbabwe, Part 5 Auditor-General, S.309(1) provides "There must be an Auditor-General, whose office is a public office but does not form part of the Public Service." Constitution of Zimbabwe S.309(2) lists the functions of the Auditor-General, including to "audit the accounts, financial systems and financial management of all departments, institutions and agencies of government, all provincial and metropolitan councils and all local authorities." S.311 of the Constitution, Independence of the Auditor-General, provides that "In the exercise of his or her functions the Auditor-General is independent and subject only to the law." The Auditor-General is empowered to "order the taking of measures to rectify any defect in the management and safeguarding of public funds and public property" (Constitution S.309).
Audit Office Act S.6 permits the Auditor-General "on behalf of the House of Assembly, audit the accounts of any public entity, or designated corporate body". Audit Office Act S.6 further confirms that the Auditor General "may carry out examinations into the economy, efficiency and effectiveness with which any Ministry, public entity, local authority, designated corporate body, statutory fund or other body has used public resources in discharging its functions."
PECOG S.207 requires financial statements of public entities subject to PECOG to be audited by independent external auditors.
The Office of the Auditor-General conducts its audits in accordance with the International Standards for Supreme Audit Institutions (ISSAIs) and International Standards on Auditing (ISAs) and uses a risk-based audit approach.[125] [126]
See analysis at 12(b)(c) on Annual Reports published by the Office of the Auditor General.

Adoption of IPSAS Reporting Framework: In 2019 the regulator of the accountancy profession in Zimbabwe, Public Accountants and Auditors Board (PAAB) prescribed the International Public Sector Accounting Standards (IPSASs) for use in Zimbabwe on 01 March 2019.[127]. According to the Auditor-General 2024 Report, "IPSASs have been adopted by the Government of Zimbabwe as the financial reporting framework. The Ministries, Local Authorities and selected State-Owned Enterprises and Parastatals are expected to have fully implemented the IPSAS reporting framework by December 31, 2025. Central Government had been using cash accounting basis for Appropriation Accounts and accruals accounting for Fund Accounts."[128]

Institutional independence of the Office of the Auditor-General – budgetary limitations: The main sources of funding of the Office of the Auditor-General are Treasury funding and revenue collections from audit fees.[129] The 2017 PEFA Assessment Report,[130] PI 30.4 Supreme Audit Institution Independence, concluded that a score of D was appropriate due to "de facto limitations on the Auditor Generals' budget allocation and execution process" despite principles of independence of the Auditor-General being well established on other parameters such as appointment and removal of the Auditor-General, planning and executing audit engagements and access to records, documents and information. Budget allocation remains an issue. The Open Budget Survey 2023[131] recommended strengthening

[125] Audit Office Annual Report 2023, Office of the Auditor-General Zimbabwe.
https://auditorgeneral.gov.zw/#
[126] See, for example, ISSAI 100 Fundamental Principals of Public-Sector Auditing
https://www.issai.org/pronouncements/issai-100-fundamental-principles-of-public-sector-auditing/
and INTOSAI GUID 5280 Guidance for audits of public procurement
https://www.issai.org/pronouncements/guidance-for-the-audits-of-public-procurement/
[127] SI 41 of 2019.
[128] Summary of Auditor-General Report for the year ended December 31, 2024.
[129] According to the Audit Office Report for 2024, Treasury funding was ZWG 55 million and ZWG 60 million from audit fees. The total approved budget was ZWG 198 million, and total expenditure was ZWG 55 million, a net underspend of ZWG 143 million. The underspending was mainly due to non-release of funding from the Treasury as a result of low revenue inflows.
[130] 2017 PEFA Assessment Report 2017, Published August 2018
https://www.pefa.org/sites/default/files/assessments/reports/ZW-Aug18-PFMPR-Public-with-PEFA-Check.pdf
[131]Open Budget Survey 2023, Zimbabwe, International Budget Partnership
https://internationalbudget.org/open-budget-survey/country-results/2023/zimbabwe

the independence of the Office of the Auditor-General by requiring "legislative or judicial approval to remove the head of the supreme audit institution." PFMRS flags the lack of funding independence of the Office of the Auditor-General to resource its planned audit programmes.[132] PFMRS Interim Review notes the ongoing inadequate financial and technical capacity of the Office of the Auditor-General (OAG) and recommends that the OAG lobbies for increased financial support from the national budget to address resource constraints.[133] **PRAZ Condonation function:** PRAZ also has power to rectify contraventions in procurement proceedings by annulment, cancellation, condonation and ratification of procurement proceedings after conducting an investigation in terms of S.98(2) PPDPAA. According to PRAZ Annual Report 2024, the Operations Division processed 15 "condonation" requests in 2024.
Gap analysis
Recommendations
Assessment criterion 12(a)(e): review of audit reports provided by the SAI and determination of appropriate actions by the legislature (or other body responsible for public finance governance)
Conclusion: No gap
Qualitative analysis The legal framework provides for Parliamentary oversight of State revenues and expenditures. The Minister is required to lay before the House of Assembly annual reports and special reports submitted by the Auditor-General within specified timelines. Parliament through the Public Accounts Committee (PAC) conducts a post audit process with hearings conducted in public. Reports of the Public Accounts Committee, which include recommendations, are discussed in the plenary of the National Assembly and published. **Parliamentary oversight – Public Accounts Committee:** The Constitution S.299(1) Parliamentary oversight of State revenues and expenditure, requires Parliament to "monitor and oversee expenditure by all State and all Commissions and institutions and agencies of government at every level, including statutory bodies, government-controlled entities, provincial and metropolitan councils and local authorities, in order to ensure that - (a) all revenue is accounted for; (b) all expenditure has been properly incurred; and (c) any limits and conditions on appropriations have been observed." Parliament, "through the Public Accounts Committee, conducts a post audit of funds granted for public expenditure in Ministries and Parastatals to ensure that funds are spent for the purposes intended."[134] Audit Office Act S.10 Annual Report of Comptroller and Auditor-General, requires the Auditor-General to prepare and submit to the Minister, not later than 30th June in each year, an annual audit report. Audit Office Act S.11 Reports to be laid before Parliament, requires the relevant Minister to lay annual reports and special reports[135] before the House of Assembly on one of the seven days on which the House of Assembly sits after the Minister has received such a report. Hearings of the Public Accounts Committee are public. Reports of the Public Accounts Committee, which include recommendations, are discussed in the plenary of the National Assembly and published.

[132] PFMRS, page 40.
[133] PFMRS Interim Review, paragraph 6.1.3 and 6.1.4.
[134] https://www.parlzim.gov.zw/download/roles-functions-mandate-of-committees-of-parliament1/
[135] Audit Office Act s.11 Special reports provides that the Auditor-General may also prepare special reports where deemed desirable to do so by the Auditor-General or where the Auditor General is directed to do so by the Public Accounts Committee.

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The Open Budget Survey 2023[136] recommended that Zimbabwe's Parliament should "[a]llow members of the public or civil society organisations to testify during its hearings on the Audit Report [issued by the supreme audit institution]" and this recommendation is included in the PFMRS Interim Review. *See analysis at 12(c)(a) & (b) on follow up and enforcement of audit recommendations.*
Gap analysis
Recommendations
Assessment criterion 12(a)(f): clear mechanisms to ensure that there is follow-up on the respective findings.
Conclusion: No gap
Qualitative analysis The regulatory framework provides mechanisms for follow up on internal and external audit findings, in particular through the activities of audit committees and the Parliamentary scrutiny process. **Audit Committee follow up on internal and external audit findings:** PFMA S.84 Audit Committees, requires audit committees to: "(a) to review … the internal audit findings, and to recommend appropriate action to be taken by the responsible authorities; …. (c) to review with the Auditor-General or other external auditors, as may be appropriate, … any findings and action to be taken in connection therewith." PECOG S.240 to 254 includes within the responsibilities of the Audit Committee, reviewing reports from internal audit and the audit carried out by external auditors and ensuring that a combined assurance model is applied and aligned to the risk management process and "track implementation of responses" including in relation to weaknesses in financial control and finance management. **Parliamentary scrutiny:** *See analysis at 12(a)(e) of Parliamentary oversight by the Public Accounts Committee*. Hearings of the Public Accounts Committee are public. Reports of the Public Accounts Committee, which include recommendations, are discussed in the plenary of the National Assembly and published. *See analysis at 12(c) (a) & (b) on Enforcement and follow-up on findings and recommendations.*
Gap analysis
Recommendations
Sub-indicator 12(b) **Coordination of controls and audits of public procurement**
Assessment criterion 12(b)(a): There are written procedures that state requirements for internal controls, ideally in an internal control manual.
Conclusion: Medium risk gap
Qualitative analysis PFM Regs. R.50 Internal controls and internal audit, sets out basic requirements for conduct of internal audit and there is an Internal Audit Manual published in 2017 to serve as a reference guide to all internal audit staff in Government.

[136] Open Budget Survey 2023, Zimbabwe, International Budget Partnership, page 7.
https://internationalbudget.org/open-budget-survey/country-results/2023/zimbabwe

PFM Regs. R.50 Internal controls and internal audit, require that the standards used by the internal audit function must be consistent with the Institute of Internal Auditors standards for internal auditing. Each internal auditor is required to conduct his or her work in accordance with the standards, principles and code of ethics set by the Institute of Internal Auditors.[137] According to the regulatory framework, internal audit reports directly to an internal Audit Committee.

The Government of Zimbabwe Internal Audit Manual was published in 2017[138] and is intended to serve as a reference guide to all internal audit staff in Government. The Internal Audit Manual covers the structure and management of internal audit, types of audits, internal audit relationships, and professional responsibilities as well as the execution of internal audit procedures, from planning an engagement through to resolution of outstanding issues. It identifies four types of audits: financial, operational, compliance and other audits. The chapter on other audits includes a short section on auditing procurement (S.4.6).

The CIAU confirmed in discussion with the MAPS Assessment team that the Internal Audit Manual (2017) is under review to align it with global audit standards.

Gap analysis

The Internal Audit Manual (2017) is not aligned with global audit standards and requires review and updating.

Recommendations

Prioritise review and updating of the Internal Audit Manual (2017) to align with global audit standards.

Assessment criterion 12(b)(b):

There are written standards and procedures (e.g. a manual) for conducting procurement audits (both on compliance and performance) to facilitate co-ordinated and mutually reinforcing auditing.

Conclusion: No gap

Qualitative analysis

Office of the Auditor General, Procurement Audit Manual, March 2023: The Office of the Auditor General has a Procurement Audit Manual (PRAM) designed to provide guidance to audit staff in conducting procurement audit, as part of a Financial Audit, Compliance Audit, Performance Audit or independently as a "stand-alone" audit.[139] The Procurement Audit Manual includes a Checklist for Procurement Audit.

In practice, procurement oversight by the Auditor-General is currently carried out as part of the general financial and compliance audits, rather than as separate specialised procurement audits.

See 12(b)(a) for analysis of Internal Audit Manual, Government of Zimbabwe, 2017.[140]

Gap analysis

Recommendations

Assessment criterion 12(b)(c):

[137] https://www.theiia.org/en/affiliates/iia-zimbabwe/

[138] Internal Audit Manual, Government of Zimbabwe, Accountant General, Ministry of Finance and Economic Development, October 2017.
https://policyvault.africa/wp-content/uploads/policy/ZWE67.pdf

[139] In line with INTOSAI Fundamental principles of public sector auditing
https://www.intosai.org/fileadmin/downloads/documents/open_access/ISSAI_100_to_400/issai_100/ISSAI_100_EN.pdf

[140] Internal Audit Manual, Government of Zimbabwe, 2017
https://policyvault.africa/wp-content/uploads/policy/ZWE67.pdf

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There is evidence that internal or external audits are carried out at least annually and that other established written standards are complied with.*

Conclusion: No gap

Qualitative analysis

The Auditor-General carries out external audits annually in accordance with established written standards. Procurement oversight is conducted as part of financial/compliance audit process. The Auditor-General also carries out value for money audits.

External audit: The Auditor-General publishes three financial audit reports on an annual basis (plus a Summary overview) covering (1) Central government Appropriation accounts - Ministries and Commissions (2) State Owned Enterprises and Parastatals, and (3) Local Authorities.
The Auditor- General's audit reports are published promptly and are available from the website of the Auditor-General: https://auditorgeneral.gov.zw/
The Auditor-General's statutory audits are carried out in accordance with the International Standards of Supreme Audit Institutions and the International Standards on Auditing.[141] In practice, audits carried out by the Auditor-General are predominantly financial and compliance focussed, with procurement oversight conducted as part of those audits rather than specialised procurement audits.

The Auditor General has carried out and published several value for money (performance) audit reports, most recently (January 2025) on the facilitation, provision and construction of schools by the Ministry of Primary and Secondary Education.[142] The Auditor General identified shortcomings on issues of rolling out/execution of the construction plans and provision/construction of schools in new settlements.

See 12(d)(a) for analysis, Gap and Recommendations relating to capacity building to support external auditors to conduct high-quality procurement audits, including procurement performance audits.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 12(b) Assessment criterion (c):*
- *number of specialised procurement audits carried out compared to total number of audits (in %).*
- *share of procurement performance audits carried out (in % of total number of procurement audits).*

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Total number of audits - all types (financial, compliance and performance)	217	209	324	368	453

** Notes provided by Office of the Auditor General to accompany above data

1. Kindly note procurement audits are included during the financial and compliance audits and all the findings related to procurement are also included in the Auditor- General report on yearly basis.

2. The Office also conducts forensic audits whose scope depends on the terms of reference by requesting Authority. In some instances the scope may require investigation on procurement related matters. These are done upon request from the entities.

[141] Summary of Auditor-General Report for the year ended December 31, 2024.
[142] Value for Money Audit Report of the Auditor General on the facilitation, provision and construction of schools by the Ministry of Primary and Secondary Education, Presented to Parliament of Zimbabwe 2025, VFM 2025:01

3. In the performance audits conducted, the audits also include value for money where procurement issues are also covered.

Source: Office of the Auditor-General.

Gap analysis

Recommendations

Assessment criterion 12(b)(d):
Clear and reliable reporting lines to relevant oversight bodies exist.

Conclusion: No gap

Qualitative analysis
Treasury Instructions: S.158 (5) Whenever there is any suspicion that acts have been or are being performed involving public moneys or state property which may involve dishonesty, criminal intent, or corruption the Head of Office shall immediately report the matter to the Police, Anti-Corruption Commission and their Accounting Officer. Any report made to the Police shall be the subject of a written acknowledgement which shall be forwarded by the Head of Office to their Accounting Officer.

The Internal Audit Manual provides at 4.5.2 Audit Procedure xvi "If fraud is suspected a report should be made to senior management for them to take action." S.5 provides for a Fraud Investigation Procedure which may be conducted "at the request of management as a result of a tip off from a whistle blower or at the discretion of an internal auditor" and the internal auditor shall promptly notify management of any significant findings, which result from a fraud and financial irregularity audit."
Annexure A Roles and Responsibilities of the Audit Committee Reporting channels provides "Should a report to an audit committee, whether from the IA function or any other source, implicate the Accounting Officer in fraud, corruption or gross negligence the chairperson of the committee must promptly report this to Treasury or Auditor General."
See also analysis at 14(f) Secure mechanisms for reporting prohibited practices or unethical behaviour

Gap analysis

Recommendations

Sub-indicator 12(c)
Enforcement and follow-up on findings and Recommendations

Assessment criterion 12(c)(a):
Recommendations are responded to and implemented within the time frames established in the law.*

Conclusion: High risk gap + red flag

Qualitative analysis
There is a lack of data to assess responses to and implementation of internal audit recommendations.
The Office of the Auditor-General publishes data on external audit findings and the extent to which those findings are addressed by procuring entities. Full implementation of external audit recommendations is low (33% in 2024), with Ministries and Commissions failing to address implementation in 59% of cases.
Comprehensive data on implementation of Parliamentary recommendations is lacking.

See 12(c)(b) for further analysis on implementation /enforcement of internal audit recommendations and oversight of implementation of Parliamentary recommendations.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 12(c) Assessment criterion (a):*
- Share of internal and external audit Recommendations implemented within the time frames established in the law (in %).

Internal audit

Data not available – see qualitative analysis above.

External audit recommendations

The 2024 Reports of the Auditor General provide data on the extent to which 2023 audit findings were addressed, partially addressed or not yet addressed, as follows:

Ministries and Commissions: 411 Audit Findings for 2023, of which 120 (29%) addressed, 48 (12%) partially addressed, 243 (59%) not yet addressed.[143]

Local Authorities: 639 Audit Findings for 2023, of which 195 (31%) addressed, 83 (13%) partially addressed, 361 (56%) not yet addressed.[144]

SOEs and Parastatals: 595 Audit Findings for 2023, of which 246 (41%) addressed, 115 (19%) partially addressed, 234 (39%) not yet addressed.[145]

Based on the above date the best performing procuring entities in terms of having addressed or partially addressed findings are SOEs and Parastatals.

Aggregated data for all three types of audited entities is shown in the chart below.

Implementation of external audit recommendations					
	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
% of audit recommendations implemented within timeframes specified in the law	**31%**	**22%**	**31%**	**27%**	**33%**

Source: Office of the Auditor-General

Gap analysis

There is a lack of data on internal audit recommendations and implementation of those recommendations.

Implementation of external audit recommendations by procuring entities is poor.

There is a lack of publicly available data on recommendations of the Parliamentary Public Accounts Committee and tracking of the implementation of those recommendations.

► This Gap is assigned a Red flag because it requires actions to remedy shortfalls including in the PFM system, internal & external audit and Public Accounts Committee (PAC) review system, which lie outside the procurement sphere.

Recommendations

Combined recommendations for 12(c)(a) and 12(c)(b)

Introduce systems/measures to ensure that all PEs consistently record internal audit recommendations, prepare an action plan and track implementation of those recommendations, with data recorded centrally to cover all PEs.

Introduce/improve measures to ensure that PEs consistently prepare an action plan for implementation of external audit recommendations and track implementation.

[143] Report of the Auditor General for the Financial Year ended December 31, 2024, on Appropriation Accounts, Finance and Revenue Statements and Fund Accounts, Executive Summary, section 13 Progress in Addressing Prior Year Audit Findings.
[144] Report of the Auditor General for the Financial Year ended December 31, 2024, on Local Authorities.
[145] Report of the Auditor General for the Financial Year ended December 31, 2024, on State Owned Enterprises and Parastatals.

See also, recommendation at 12(a)(b) capacitation of Audit Committees. Enhance structures monitoring and reporting of audit recommendations by an appropriate external agency. Improve data on Parliamentary oversight of audit recommendations through use of Parliamentary Budget Office (PBO) standard reporting template and implementation of proposal to link PBO system and PFMS.
Assessment criterion 12(c)(b): There are systems in place to follow up on the implementation/enforcement of the audit Recommendations.
Conclusion: High risk gap + red flag
Qualitative analysis PFM Regs. R.50 Internal controls and internal audit, S.50(17) requires that "Every auditor shall provide substantive responses to any internal or external audit report within 30 working days of submission of such report. S.50(18) provides that "failure to comply with the above requirement without justifiable cause shall constitute an act of financial misconduct as defined in the [PFMA]." The CIAU confirmed in discussions with the MAPS Assessment team that data on internal audit recommendations and implementation of those recommendations is rudimentary and quality is not always high, with poor knowledge management observed in MDAs. Internal audit processes are, essentially manual, including the central collection of data. Planned automation of internal audit processes should assist data collection and analysis and for the preparation of an internal audit findings register. The Office of the Auditor-General has a system in place to follow up on implementation of external audit recommendations and reports compliance in its Annual Reports (see quantitative analysis at 12(c)(a)). PFMRS identifies limited responses and attention by the Government to the findings of the external auditors and states "[t]here is no follow-up on implementation of the recommendations made by the Auditor General and the Public Accounts Committee because of the lack of appropriate mechanisms (Treasury Minutes)."[146] [147] The 2017 PEFA Assessment Report,[148] PI-31 Legislative scrutiny of audit reports, noted a high degree of transparency in legislative scrutiny (scoring A) but lower scores (C) for the time taken for legislative scrutiny and poor follow up on implementation of public accounts committee recommendations. The Open Budget Survey 2023[149] concluded that "Zimbabwe's Parliament provides adequate oversight during the planning stage of the budget cycle and weak oversight during the implementation stage" AFRODAD noted in 2023, in the context of proposed amendments to the PFMA,[150] [151] "the general weakness of the PAC in monitoring implementation of recommendations, follow-up actions or enforcement" commenting that "[W]ithout this power, the PAC is unable to flex any muscle after the examination of the reports of the Auditor General". AFRODAD has made recommendations to in line with the SADC model law on public finance management to address this and other gaps in the responsibilities of the PAC. PFMRS Interim Review records that the Parliamentary Budget Office (PBO) has designed a reporting template incorporating data including the status of implementation and OAG recommendations. However effective

[146] PFMRS, page 40.
[147] PFMRS Interim Review, paragraph 6.2.2 to 6.2.5.
[148] 2017 PEFA Assessment Report 2017, Published August 2018
https://www.pefa.org/sites/default/files/assessments/reports/ZW-Aug18-PFMPR-Public-with-PEFA-Check.pdf
[149]Open Budget Survey 2023, Zimbabwe, International Budget Partnership, page 7.
https://internationalbudget.org/open-budget-survey/country-results/2023/zimbabwe
[150] The Zimbabwe PFM Amendment Bill based on the SADC Model Law on Public Finance Management, African Forum and Network on Debt and Development.
https://afrodad.org/resources/publications?title=PFM&category=Policy+Briefs&year=2023
[151] Public Finance Management Amendment Bill 2021.

Parliamentary oversight remains hindered because the PBO is not connected to the PFMS and this activity is flagged as a priority for NDS2.[152]

Gap analysis

There are regulatory provisions requiring procuring entities to respond to internal and external audit recommendations within a specified time period but there is no reliable consolidated data on internal audit follow up and implementation of those recommendations. The Auditor-General has a system for follow up on implementation of external audit recommendations, but compliance is poor. Follow up at the implementation stage for Parliamentary recommendations is weak.

► This Gap is assigned a Red flag because it requires actions to remedy shortfalls including in the PFM system, internal & external audit and Public Accounts Committee (PAC) system, which lie outside the procurement sphere.

Recommendations

See recommendations at 12(c)(a).

Sub-indicator 12(d)
Qualification and training to conduct procurement audits

Assessment criterion 12(d)(a):

There is an established programme to train internal and external auditors to ensure that they are qualified to conduct high-quality procurement audits, including performance audits.*

Conclusion: Low risk gap

Qualitative analysis

The delivery of training for internal and external auditors and PRAZ audit staff has been rolled out in recent years with plans for continued delivery of that training. Internal auditors participate in training on public procurement and in 2024 PRAZ has hosted a well-attended knowledge sharing event aimed at Internal Auditors and audit committee members. Training for external auditors on Methodology and Best Practices of Auditing Procurement was delivered in 2024 and 2025. A procurement audit training programme is underway, facilitated by PRAZ and delivered by International Training Centre of the International Labour Organization, in early 2026 with 40 participants: 30 from PRAZ, 5 from Central Internal Audit Unit and 5 from the OAG.

Internal audit: According to the CIAU, when junior staff are recruited to the internal audit unit, they will not necessarily be suitably qualified as they arrive with more general qualifications and their knowledge needs to be aligned with public sector practices.[153] In order to enhance their career progression internal audit staff may choose to pursue further professional qualifications such as those offered by the Institute of Internal Auditors.[154]

In 2024, PRAZ hosted an Indaba (conference/discussion meeting/event) on public procurement attended by 190 Internal Auditors and 12 Audit committee members. PRAZ also hosted an eGP summit which included internal auditors as part of the target group.

External audit: The Office of the Auditor-General is accredited to the professional accountancy organisations such as ACCA, ICAZ and CPA. In 2024 the OAG supported 138 staff in various disciplines through membership subscriptions and facilitation to under professional certification training. In September 2025 there were 223 external auditors. As part of its continuous professional development the OAG implemented 59 capacity building trainings with 286 staff members participating in these training opportunities. These events included IFRSs and IPSAS update workshop, PRAC Manual refresher course and Z-SEAT AFROSAI-E workshop.

[152] PFMRS Interim Review, paragraph 6.2.2 to 6.2.5.

[153] Information provided by IAU MOFEDIP to MAPS Assessment team in discussions on 05 November 2025.

[154] https://www.theiia.org/fr-ca/affiliates/iia-zimbabwe/about/

In 2023 2 training courses were conducted on the Procurement Audit Manual.[155] In 2024, 2 training courses were conducted on Methodology and Best Practices of auditing procurement. In 2025, 2 training courses were conducted on Electronic Government Procurement System and Methodology and Best Practices of auditing procurement.

A procurement audit training programme is underway in early 2026, facilitated by PRAZ. There are 40 participants: 30 from PRAZ, 5 from Central Internal Audit Unit and 5 from the OAG. ITC-ILO is conducting the training and will certify the participants who successfully go through the course. There are plans to roll out trainings targeting more internal auditors and the members of the Auditor General's Office through Southern African Public Procurement Training Academy, which is a PRAZ initiative

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 12(d) Assessment criterion (a):*
- number of training courses conducted to train internal and external auditors in public procurement audits.

Internal audit - see qualitative analysis – PRAZ hosted event in 2024 for 190 internal auditors.

External audit

Training of auditors in public procurement audit (Criterion 12(d)(a))					
	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Number of training courses conducted to train external auditors in public procurement audits	**2** Framework agreements and Procurement manual	**1**	**2** Procurement audit manual and PRAZ and Law enforcement agencies	**2** Methodology and Best Practices of Auditing Procurement	**2** Electronic Government Procurement System and Methodology and Best Practices of Auditing Procurement

Source: Office of the Auditor General

- share of auditors trained in public procurement (as % of total number of auditors)
Data requested but not provided

Gap analysis
External auditors have received training on methodology and best practices of auditing procurement but currently they do not undertake specialist procurement audits or procurement performance audits. Good progress is being made in the establishment of a permanent specialised training programme but there will need to be higher levels of participation by internal and external auditors to support the conduct and delivery of public procurement focussed audits by those auditors.

Recommendations
Combined recommendations for 12(d)(a) and 12(d)(b).

Continue to develop the programme to provide regular training for both internal auditors and external auditors on the conduct of procurement audits to maintain and enhance specialist professional audit knowledge and to facilitate

[155] Zimbabwe Office of the Auditor-General (OAG) Procurement Audit Manual, March 2023.

the commencement of specialist procurement audits and procurement performance audits by internal audit function and the Office of the Auditor General.

Ongoing strengthened inter-institutional cooperation between PRAZ, Office of the Auditor-General and internal audit (including Central Internal Audit Unit) is likely to be beneficial to the increased adoption of specialised procurement audits.

Assessment criterion 12(d)(b):
The selection of auditors requires that they have adequate knowledge of the subject as a condition for carrying out procurement audits; if auditors lack procurement knowledge, they are routinely supported by procurement specialists or consultants.

Conclusion: Medium risk gap

Qualitative analysis
As noted at 12(b)(c), procurement oversight is conducted as part of general external financial/compliance audit process and external auditors receive training on methodology and practices of procurement auditing. Auditors are selected to undertake audits according to their expertise. Separate, specialised procurement audits or procurement performance audits are not conducted by the Office of the Auditor General.

Gap analysis
Separate, specialised procurement audits or procurement performance audits are not conducted by the Office of the Auditor General.

Recommendations
See combined recommendations at 12(d)(a).

Assessment criterion 12(d)(c):
Auditors are selected in a fair and transparent way and are fully independent.

Conclusion: No gap

Qualitative analysis
Internal auditors are civil servants, and they are recruited and selected using procedures run by the Public Service Commission. On 01 November 2025 there were 132 Internal Auditors (all levels) within MDAs.

2.2. Number of internal auditors within MDAs – at all levels

Public procurement posts within MDAs at 01 November 2025			
	Establishment	Filled posts	Vacancies
Total number			
Breakdown by job title			
Director, Audit	22	18	2
Deputy Director, Audit	19	15	4
Auditors	189	132	57

Source – Public Service Commission

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The Office of the Auditor-General is a public office but does not form part of the civil (public) service. Job opportunities are published on the OAG's website and appointment is a competitive process. There were 223 OAG external auditors on 01 September 2025.
The Public Entities Corporate Governance Act requires that SOEs and parastatals must be subject to an annual independent external audit based on international standards and they must appoint for a defined period of time appropriately qualified independent external auditors to carry out the required audits.
All auditors are required to comply with professional ethical standards which require independent exercise of their functions. All civil servants are required to sign the Integrity Pledge and external auditors also sign the AOG Code of Ethics Declaration.

Gap analysis

Recommendations

Indicator 13. Procurement appeals mechanisms are effective and efficient

Sub-indicator 13(a)
Process for challenges and appeals

Assessment criterion 13(a)(a):
Decisions are rendered on the basis of available evidence submitted by the parties.

Conclusion: No gap

Qualitative analysis

Challenge:
S.73(4)(a) provides that a challenge shall not be entertained unless in the written notice the bidder has identified the specific act or omission alleged to constitute a breach of duty on the part of the procuring entity.

Appeal – Review panel decisions
S.73(1) of the PPDPAA provides that a potential or actual bidder in procurement proceedings who claims to have suffered, or to be likely to suffer, loss or injury due to a breach of a duty imposed on a procuring entity by or under this Act, may challenge the procurement proceedings by lodging a written notice with the PE. S.74 regulates the creation of a review panel that will review challenges to a PE's decisions in the event that the PE does not concede an error that was made or the bidder is dissatisfied with the steps taken by the PE. In applying for review proceedings, the applicant must submit *inter alia* copies of any documentary evidence the applicant relies on in support of the claim pursuant to R.56(1)(b) of the PPDPA Regs. R.57(1)(b)(i) in turn provides that the respondent shall submit to the Secretariat its response to the applicant's contentions which must be accompanied by copies of any documentary evidence relied on by the respondent.

R.60(1) provides that "a review panel *may* take into consideration, without further proof, statements and allegations made in the application and reply and the supporting documents submitted by the parties with the application and reply, unless the panel considers any such statement or allegation needs to be clarified, amplified or verified, in which event the panel may call upon the parties to supply such further evidence, whether documentary or oral, as the panel may specify." (own emphasis added). As to the outcome of the review, R.61(4) provides that the decision of the review panel shall be confined to the issues raised by the application and the respondent's reply. However, R.56(3) provides that where an application for review does not comply with the regulations (including the requirement in R.56(1)(b) to submit documentary evidence), the Secretariat shall reject and return it with reasons for the rejection. Further, S.76(5) provides that where the review panel finds that the bidder established valid grounds for the challenge, which would be evident from the documentary evidence required in R.56(1)(b), it may make certain actions set out in S.76(5). Therefore, meaningful decisions by the review panel cannot be made without reference to the evidence submitted by the parties.

A party dissatisfied by the decision of a review panel can appeal the decision to the Administrative Court pursuant to S.77 of the PPDPAA. R.61 provides that an appeal to the Administrative Court or other Courts will only be valid if the challenge proceedings under the PPDPAA or the PPDPA Regs have been complied with. Therefore, decision by the Administrative Court will be based on the evidence submitted by the parties.

Gap analysis

Recommendations

Assessment criterion 13(a)(b):
The first review of the evidence is carried out by the entity specified in the law.

Conclusion: No gap

Qualitative analysis
The first review is carried out by the applicable procuring entity in response to a challenge submitted to it by a bidder, as required by S.73 of the PPDPAA.

Gap analysis

Recommendations

Assessment criterion 13(a)(c):
The body or authority (appeals body) in charge of reviewing decisions of the specified first review body issues final, enforceable decisions. *

Conclusion: No gap

Qualitative analysis
S.77(1) of the PPDPAA provides that a bidder or PE aggrieved by the decision of a review panel may appeal against the decision to an Administrative Court. However, the Administrative Court may not set aside the decision of the review panel but may award fair and adequate compensation to the appellant for patrimonial loss or damaged suffered in terms of S.77(2). This indicates that the decision of the review panel is final, binding and enforceable.

Judicial review may be brought in a civil court pursuant to the Administrative Justice Act where an administrative authority has breached a duty as defined in the Act.

As indicated in the table below, the number of appeals is generally low with an increase in 2022. No data as to the number and percentage of enforced decisions is available.

Quantitative analysis

** Quantitative indicator to substantiate assessment of sub-indicator 13(a) Assessment criterion (c):*
- number of appeals.
Source: Review Panel Secretariat, December 2025.

Review Panel applications and decisions (S.74(2) PPDPA Act [Ch. 22:23])

	Total number of applications for review	Decisions on applications for review		
		Decisions dismissed	Written decision issued by RP within statutory time frame* (number)	Written decisions issued by RP outside the statutory time frame* (number)
2020	4	3(RP)	3	1
2021	1	1(RP)	1	0
2022	16	10(RP) & 2(Secretariat)	14	0
2023	6	3(RP) & 1(Secretariat)	5	0
2024	4	2(RP) & 1(Secretariat)	4	0
2025	4	2(RP) & 2(Secretariat)	2	0

** Recommended quantitative indicator to substantiate assessment of sub-indicator 13(a) Assessment criterion (c): number (and percentage) of enforced decisions.*

Data not available

Gap analysis

Recommendations

Suggestion for improvement

Implement measures to track enforcement of Review Panel decisions.

Assessment criterion 13(a)(d):

The time frames specified for the submission and review of challenges and for appeals and issuing of decisions do not unduly delay the procurement process or make an appeal unrealistic.

Conclusion: No gap

Qualitative analysis

The time frames specified for the submission and review of challenges and appeals and issuing of decisions do not unduly delay the procurement process or make an appeal unrealistic if adhered to.

Challenge submission: S.73 of the PPDPAA makes a distinction between challenges where the notice of award has been issued and where it has not yet been issued. In the latter instance, a challenge may be lodged at any stage of the procurement proceedings up to the date on which such notice is issued in terms of S.73(2). Where the challenge relates to alleged improprieties in the bid invitation or pre-qualification of bidders, that became apparent before bids were opened, must be lodged prior to bid opening.

In the case of a challenge where a notice of award has been issued, a challenge may be lodged only within the 14-day period referred to in S.55(2)[156] or 60(14).[157]
Challenge decision: S.73(5) provides that if the procuring entity concedes that it breached a duty as alleged in the challenge, it shall within five days (a) notify the bidder concerned and the Authority of its concession; and (b) take whatever steps it considers necessary, or as the PRAZ may direct, to rectify the breach.

Appeal (Review panel) submission: S.74(1) of the PPDPAA regulates the time frame for appeals and provides that where either a procuring entity has not conceded that it breached a duty as alleged in a challenge or the bidder that lodged the challenge is dissatisfied with any steps taken or to be taken in terms of S.73(5)(b) to rectify the breach alleged in a challenge, the bidder may within five days after lodging the challenge apply in writing to the PRAZ for the procurement proceedings concerned to be reviewed by a review panel.
Appeal (Review Panel) decision: S.76(1) provides that "a review panel appointed to hear a challenge shall conduct such investigation and hearing as it considers appropriate and deliver its written decision in the matter, setting out its reasons for the decision, within fourteen days after the application for review of the procurement proceedings concerned was received by PRAZ."

Gap analysis

Recommendations

Sub-indicator 13(b)
Independence and capacity of the appeals body

The appeals body:

Assessment criterion 13(b)(a):
is not involved in any capacity in procurement transactions or in the process leading to contract award decisions

Conclusion: No gap

Qualitative analysis
The appeals body (Review Panel) is not involved in any capacity in procurement transactions or in the process leading to the contract award decisions for the following reasons:

1. In terms of S.75(2) of the PPDPAA, the members of the review panel are appointed from a pool of persons nominated by the Law Society of Zimbabwe, the Public Service Commission, organisations representing professional organisations and other organisations which have persons that have expertise in procurement. Therefore, they are not procurement officers involved in implementing procurement.
2. Advertisements calling for persons to serve as members of the review panel are published.
3. In terms of S.75(3), PRAZ is obligated to keep a list of panellists available for inspection by members of the public. This serves as a check to ensure that no conflicts exist.

[156] S.55(2) provides that "before the expiry of the period of bid validity, the procuring entity shall notify (a) the successful bidder of the proposed award and of the time within which the contract must be signed, subject to any intervening challenge filed in accordance with Part X; and (b) the other bidders of the name and address of the proposed successful bidder and the price of the contract; and the contract shall not be signed until at least fourteen days have passed following the giving of that notice."

[157] S.60(14) provides that "after negotiations in terms of subsection (12) or, as the case may be, subsection (13) have been successfully completed, the procuring entity shall promptly notify other firms on the short-list that they were unsuccessful, and shall not sign a procurement contract with the successful firm until at least fourteen days have elapsed following the giving of that notice."

4. R.52(1) of the PPDPA Regs provides that panellists shall be independent, impartial and bound by the rules applicable to civil servants.
5. R.52(3) requires that a panellist who has a direct or indirect personal interest must disclose such interest to PRAZ which will appoint an alternative panellist if deemed necessary.

There are therefore various provisions in the legislation that prevent a member of the appeals body from being involved in procurement transactions or the process leading to contract award decisions. However, the PRAZ Secretariat in fulfilling its numerous roles may create a potential conflict of interest which is acknowledged and managed by PRAZ which has put measures in place to identify and manage possible conflicts by dividing its operational and support functions. See analysis at criterion 5(d)(a).

Gap analysis

Recommendations

Assessment criterion 13(b)(b):
does not charge fees that inhibit access by concerned parties

Conclusion: High risk gap

Qualitative analysis
Fees are regulated in Statutory Instrument 193 of 2022 and indicate prohibitively high fees throughout the procurement process,[158] including fees to submit challenges. These fees vary from USD500 – 500 000.

S.73(4)(b) of the PPDPAA provides that a challenge will not be entertained unless when lodging the written notice, the bidder deposits with the PE a sum of money in the prescribed amount by way of security for costs payable when an initial complaint is submitted to the PE ("challenge fee"). This provision is uncommon among legal systems and greatly inhibits access to the appeal system by requiring payment of fees at the initial complaint stage to a PE, impacting a contractor's right to recourse.

The MAPS Assessment team understand from discussions with PRAZ that the level of fees charged is intended to limit frivolous or vexatious challenges and strategic use of the challenge and review process by bidders, for example, to delay award and prolong existing contractual arrangements. However, the number of review panel cases relative to the total number of procurements processes conducted demonstrates very limited use of the statutory right to challenge.

The level of fees charged for submission of challenges is one of the reasons given in the private sector survey for non-use of the challenge process. In-person engagement with supplier representatives referenced high fees as a primary reason for not submitting challenges, creating a barrier which is of particular concern for small enterprises.[159] Legal practitioners also referred to the negative impact of high security fees payable on submission of a challenge.[160]

S.67 of the PPDPAA entitles a rejected bidder to request and be provided with information within the standstill period on the reasons why its bid has been rejected. This is a right afforded to all rejected bidders irrespective of whether they are considering submitting a challenge pursuant to S.73 of the PPDPAA. The right to request information may equally be used by rejected bidders seeking information which they intend to apply to improve future bids as by those seeking to obtain information to support the decision on whether or not to submit a formal

[158] The accuracy of the fee structure was confirmed by PRAZ during discussions between its legal team and the MAPS Assessment team during December 2025.
[159] Discussions between MAPS Assessment team and suppliers/supplier representative in August 2025 and November 2025".
[160] Discussions between MAPS Assessment team and legal community in February 2026.

challenge. In direct discussions with the MAPS Assessment team several private sector stakeholders commented that the information provided by procuring entities in response to a request under s.67 is of limited value.

A request under S.67 of the PPDPAA is not a legal pre- requisite for submission of a challenge pursuant to S.73 of the PPDPAA, although in practice bidders may make a S.67 request in order to gather sufficient information to submit a formal challenge under S.73. However, S.67 PPDPAA should not be regarded as an integral part of the process for challenge and review (appeal) and the availability of this right to request information is not, in the opinion of the MAPS Assessment team, a persuasive ground to justify requiring payment of prescribed fees at the stage of submission of challenge to the PE. The unencumbered right to challenge a procurement decision is imperative and should remain accessible to bidders to ensure that rights of bidders are not unnecessarily burdened by administrative arrangements and confidence in the challenge procedure is maintained.

An active system of challenge and review used in a legitimate manner by suppliers can assist to improve the quality of decision making and record keeping within PEs. PEs who understand that there is a real possibility that their decisions may be challenged should be incentivised by this knowledge to fully record reasons for decisions and maintain comprehensive procurement files so that they are able to provide reasoned responses within tight statutory deadlines.

Gap analysis

Whilst it is common practice to require payment of administration fees for submission of an application for review to an independent review body, the imposition of fees on contractors at the stage of submitting a complaint to the PE is unusual and prohibitive to the challenge and review (appeal) process particularly when combined with the applicable level of fees, which are high. This concern is confirmed by the responses in the private sector survey indicating a reluctance to submit challenges for reasons linked to high fee charges and in discussion with stakeholders. Limited use of challenge and review may also reduce perceived accountability of procuring entities for procurement decisions which negatively affects bidders' and the public's confidence in the ability of PEs to maintain an accessible challenge procedure. This may further feed into poor record keeping noted elsewhere in this assessment.

Recommendations

1. Review the current fee structure to ensure that it does not create a barrier for access to justice for suppliers who have legitimate concerns about the conduct of procurement procedures. This should include consideration of a separate fee structure for small enterprises (as in Statutory Instrument 9 of 2026 regarding registration fees and a general reduction in fees charged, including those applied to international bidders.
2. To better align with general international practice and open up opportunities for legitimate use of the challenge and review procedure, S.73(4)(b) of the PPDPAA should be amended to exclude the charge of fees at the initial phase of submitting a complaint to a PE.

The impact of these changes, together with improved transparency with publication of review body decisions (see 13(c)(d) should be kept under review to assess whether, as a result of these changes, there is wider and more active use of the challenge and review system. If sufficient improvements are not observed, consider whether a wholesale review is required to assess fitness for purpose of the challenge and review system and to make proposals for enhancement.

Suggestions for improvement

Meaningful bidder debriefing can be an effective tool both to improve overall transparency and confidence in the procurement process and to reduce the likelihood of legal challenges. Consider measures to ensure that bidders are provided with meaningful information by PEs at the debriefing stage so that they fully understand the reasons for decisions in the procurement process, in particular the contract award decision. Provide training for PEs to support improved debriefing practices.

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Assessment criterion 13(b)(c): follows procedures for submission and resolution of complaints that are clearly defined and publicly available
Conclusion: No gap
Qualitative analysis The rules for the resolution of complaints are set out in S.73-76 of the PPDPAA and are clearly defined and publicly available. Discussions between the PRAZ legal team and the MAPS Assessment Team during December 2025 confirm that no additional rules are applicable to the challenge and appeal process.
Gap analysis
Recommendations
Assessment criterion 13(b)(d): exercises its legal authority to suspend procurement proceedings and impose remedies
Conclusion: No gap
Qualitative analysis See analysis under criterion 1(h)(b) regarding the suspension of the award of a contract. The MAPS Assessment Team reviewed 25 decisions of the review panel decided between 2018 and 2024. The analysis confirms that the review panel exercises it legal authority to impose a range of remedies as designated by the PPDPAA.
Gap analysis
Recommendations
Assessment criterion 13(b)(c): issues decisions within the time frame specified in the law/regulations*
Conclusion: No gap
Qualitative analysis S.76(1) of the PPDPAA provides that the review panel must deliver its written decision with reasons within fourteen days after the application for review was received by PRAZ. From the data below, 1 decision was issued outside the statutory time frame during 2020. In subsequent years all decisions have been issued within the allotted statutory time frame.
Quantitative analysis *Quantitative indicator to substantiate assessment of sub-indicator 13(b) assessment criterion©(e):* *• appeals resolved within the time frame specified in the law/exceeding this time frame/unresolved (Total number and in %).* *Source: Appeals body, December 2025.*

Review Panel applications and decisions (s.74(2) PPDPA Act [Ch. 22:23])				
	Total number of applications for review	Decisions on applications for review		
		Decisions dismissed	Written decision issued by RP within statutory time frame* (number)	Written decisions issued by RP outside the statutory time frame* (number)
2020	**4**	**3(RP)**	**3**	**1**
2021	1	1(RP)	1	0
2022	16	10(RP) & 2(Secretariat)	14	0
2023	6	3(RP) & 1(Secretariat)	5	0
2024	4	2(RP) & 1(Secretariat)	4	0
2025 to date	4	2(RP) & 2(Secretariat)	2	0

*Statutory time frame for issue of written decision by Review Panel [14 working days in terms of section 76(1) of the PPDPA Act]

Gap analysis

Recommendations

Assessment criterion 13(b)(f):
issues decisions that are binding on all parties

Conclusion: No gap

Qualitative analysis
S.77(1) of the PPDPAA provides that a bidder or PE aggrieved by the decision of a review panel may appeal against the decision to an Administrative Court. However, the Administrative Court may not set aside the decision of the review panel but may award fair and adequate compensation to the appellant for patrimonial loss or damaged suffered in terms of S.77(2). This indicates that the decision of the review panel is final, binding and enforceable.

Gap analysis

Recommendations

Assessment criterion 13(b)(g):
is adequately resourced and staffed to fulfil its functions.

Conclusion: No gap

Qualitative analysis
The review panel consists of 6 members and are adequately resourced and staffed to fulfil its functions as confirmed by PRAZ legal team during discussions with the MAPS Assessment Team during December 2025.

Gap analysis

Recommendations

Sub-indicator 13(c)
Decisions of the appeals body
Procedures governing the decision making process of the appeals body provide that decisions are:

Assessment criterion 13(c)(a):

based on information relevant to the case.

Conclusion: No gap

Qualitative analysis

The process followed by the review panel is regulated by S.74 and S.75 of the PPDPAA. No further rules regulate the appeal process. Analysis of review panel cases demonstrates that cases are decided on information relevant to the case.

Gap analysis

Recommendations

Assessment criterion 13(c)(b):

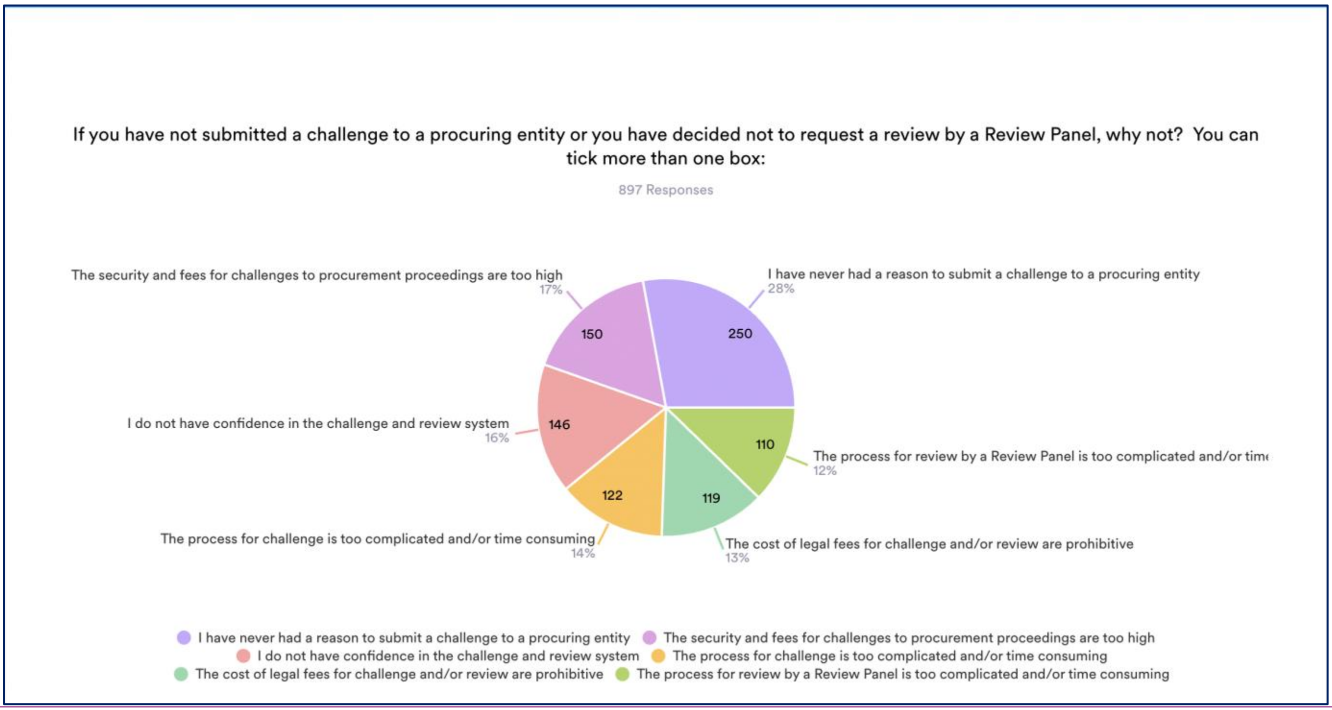
balanced and unbiased in consideration of the relevant information.*

Conclusion: No gap

Qualitative analysis

S.76 of the PPDPAA regulates the process to be followed by the review panel and requires adherence to the rules of natural justice. As noted under criterion 13(c)(a), decisions are based on evidence provided by parties, hearings and oral evidence ensuring that review panel decisions are balanced and unbiased in consideration of the relevant information. Analysis of samples of recent review panel cases by the MAPS Assessment team demonstrates that review panel members are aware of the need for balance and lack of bias and decisions in cases and reasons given for decisions.

The quantitative analysis of the private sector survey results based on 449 responses indicates a general lack of trust in the challenge and appeals system. Regarding challenges to PEs, a minority of 47% of respondents perceive the challenge process to be trustworthy and fair. Conversely, 51% of respondents consider the review panel process to be trustworthy and fair. Only 20% of respondents are of the view that decisions by the review panel are consistent. However, a majority of respondents have never submitted a challenge citing not having any reason to do so as shown in the chart below.



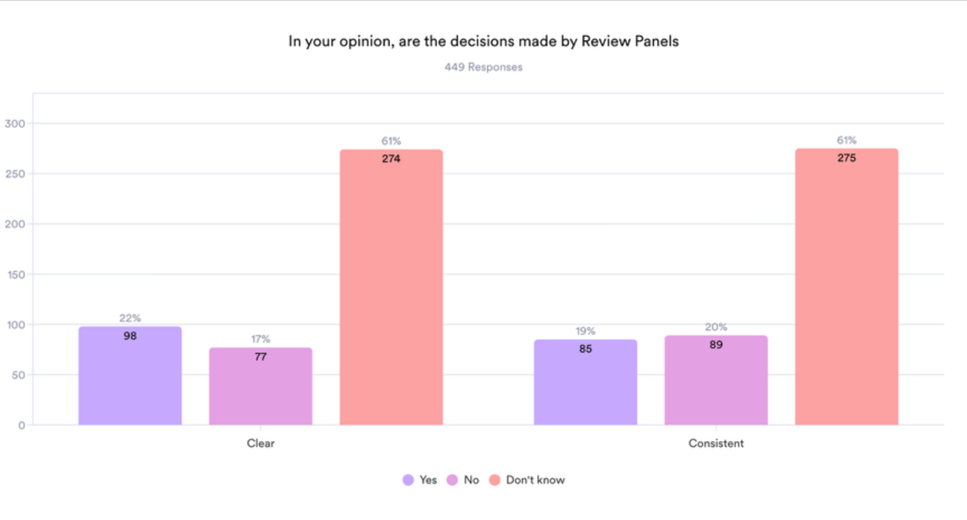
Despite most bidders not having a reason to submit a challenge, confidence in the challenge and appeal process is limited. Considering the total high number of responses these percentages are not insignificant. Various comments by respondents include the prohibitive nature of fees associated with the challenge and appeal process, perceptions of bias and limited transparency. However, most respondents perceive the appeals process to be trustworthy and based on the reliance on evidence during review panel hearings, the data does not provide sufficient evidence to lead the MAPS Assessment Team to conclude that decisions of the review panel are unbalanced or biased, for the purposes of assessment of this criterion.

Quantitative analysis

Recommended quantitative indicator to substantiate assessment of sub-indicator 13(c) Assessment criterion (b):
- share of suppliers that perceive the challenge and appeals system as trustworthy (in % of responses). Source: Survey. See combined qualitative and quantitative analysis above.

- share of suppliers that perceive appeals decisions as consistent (in % of responses).
Source: Survey.

19% of suppliers perceive appeals decisions to be consistent. However, this low figure needs to be understood in the context of the overall response figures, with 61% of suppliers responding that they “Don’t know”. This lack of knowledge to respond to the specific question is likely to be a reflection of the low number of appeals decisions, limited involvement of suppliers in the challenge and appeals system and lack of public availability of decisions which are made by the Review Panel.



Gap analysis

Recommendations

Assessment criterion 13(c)(c):
result in remedies, if required, that are necessary to correcting the implementation of the process or procedures.*

Conclusion: No gap

Qualitative analysis

The review panel has power to grant a range of remedies listed in S.76(5) of the PPDPAA (see analysis at 1(h)(b)). The MAPS Assessment team reviewed 25 decisions of the review panel between 2018 and 2024. The analysis confirms that the review panel exercises it legal authority to impose a range of remedies as designated by the PPDPAA. The remedies ordered include: prohibiting a PE from reaching a decision or acting in an unauthorised manner or from following incorrect procedure; annul in whole or in part any unauthorised act or decision of a PE other than bringing the procurement contract into force; ordering the PE to start the procurement process afresh; award damages to the bidder.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 13(c) Assessment criterion (c):*
- outcome of appeals (dismissed; decision in favour of procuring entity; decision in favour of applicant) (in %).
Source: Appeals body, December 2025.

Outcome of applications considered by Review Panel					
Year	**Total number of written decisions issued**	**Decided in favour of procuring entity (number)**	**Decided in favour of applicant (i.e. remedy/ies granted)(number)**	**Number of RP Decisions enforced**	**Number of RP decisions appealed to court**
2020	4	3	1		0
2021	1	1	0		0
2022	14	10	4		3
2023	5	3	2		1
2024	4	2	2		1
2025 to date	3	2	1		0

Gap analysis

Recommendations

Assessment criterion 13(c)(d):

decisions are published on the centralised government online portal within specified timelines and as stipulated in the law.*

Conclusion: Medium risk gap

Qualitative analysis

Review Panel decisions should be published in a timely manner and as stipulated by law which ensures transparency and confidence in the procurement system.

Review Panel decisions are issued to parties to the review process, but they are not published and publicly available, as confirmed by PRAZ legal team during discussions with MAPS Assessment Team in December 2025.

Quantitative analysis

**Quantitative indicator to substantiate assessment of sub-indicator 13(c) Assessment criterion (d):*
- share of appeals decisions posted on a central online platform within timelines specified in the law (in %).
*Source: Centralised online portal.**

0% - Review Panel decisions are not pub

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Gap analysis Review Panel decisions are not published and publicly available, resulting in a lack of transparency and reduced confidence in the procurement system.
Recommendations All Review Panel decisions should be published and easily accessible online, within designated time frames where applicable, to ensure full transparency.

Indicator 14. The country has ethics and anticorruption measures in place

Sub-indicator 14(a) **Legal definition of prohibited practices, conflict of interest, and associated responsibilities, accountabilities, and penalties** The legal/regulatory framework provides for the following:
Assessment criterion 14(a)(a): definitions of fraud, corruption and other prohibited practices in procurement, consistent with obligations deriving from legally binding international anti-corruption agreements.
Conclusion: Medium risk gap
Qualitative analysis The Criminal Law (Codification and Reform) Act (Criminal Law Code) defines fraud and corruption related offences and includes the specific offence of criminal abuse of duty as a public officer. The bribery provisions in the Criminal Law Code are not fully aligned with UNCAC. The Criminal Law (Codification and Reform) Act [Ch.9:23][161] (Criminal Law Code), Part IX Bribery and Corruption, details the offences of bribery (active and passive), corruptly using a false document, corruptly concealing a transaction from a principal, corruptly concealing from a principal a personal interest in a transaction and criminal abuse of duty as a public officer. The Criminal Law Code dates from 2004 and has been amended, including amendments to Part IX Bribery and Corruption, s.174 Criminal abuse of duty as public officer, in 2023.[162] The Prevention of Corruption Act [Ch.9:16] (POCA) covers the investigation of claims arising from dishonesty or corruption and includes a provision on “prevention of victimisation”. It also provides for the Minister to make regulations to carry out or give effect to POCA. There is legislation in force to address money laundering, proceeds of crime and combating the financing of terrorism, including the Money Laundering and Proceeds of Crime Act (Ch.9:24), Suppression of Foreign and International Terrorism Act [Ch.11:21], Criminal Matters (Mutual Assistance) Act [Ch.9:06] and related regulations. **UNCAC and UNODC implementation reviews** Zimbabwe signed the United Nations Convention Against Corruption (UNCAC) on 20 February 2004 and ratified it on 08 March 2007.[163] Zimbabwe is also a signatory to the SADC Protocol Against Corruption and the African Union Convention of Preventing and Combating Corruption. Zimbabwe is a member of the Eastern and Southern Africa Anti-Money Laundering Group.[164]

[161] Criminal Law (Codification and Reform) Act [Ch.9:23] (No.3 of 2004). https://www.veritaszim.net/sites/veritas_d/files/Crimcode%20%28updated%20to%202023.09%29.pdf

[162] Criminal Law (Codification and Reform) Amendment Act, 2023. https://www.veritaszim.net/sites/veritas_d/files/CRIMINAL%20LAW%20CODIFICATION%20AND%20REFORM%20AMENDMENT%20ACT%2C%20Act%2010%20of%202023.pdf

[163] https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XVIII-14&chapter=18&clang=_en#EndDec

[164] https://www.esaamlg.org/index.php/countries

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UNODC has undertaken two rounds of review on implementation of UNCAC in Zimbabwe, with executive summaries of the reports published in 2013 (review of Chapters III and IV) and 2020 (Review of Chapters II and V).[165] UNODC Executive Summary of the 2013 Report (review of Chapters III and IV) ("UNODC 2013 Report") analyses relevant provisions defining fraud, corruption and other prohibited practices. The UNODC 2013 Report noted in this context that S.170 of the Criminal Law Code criminalises active and passive bribery of "agents". According to that Report, the definition of "agents" does not, however, cover "persons performing unpaid services or functions for the State or a public enterprise" as enumerated in UNCAC art.2 and "the object of the bribe (undue advantage) is limited to an arrangement between an agent and a principal, and not in relation to the public official's position".[166] In addition, "the bribery provisions in the Criminal Law [Code] do not address the bribery of foreign public officials or officials of public international organisations." The MAPS Assessment Team's review of the amended Criminal Law Code indicate that amendments have not yet been made in line with these recommendations.

Gap analysis
The bribery provisions in the Criminal Law Code are not fully aligned with UNCAC, limiting the coverage of those provisions and potentially unnecessarily restricting the circumstances where criminal prosecutions may be pursued for bribery related offences.

Recommendations
Align bribery provisions in the Criminal Law Code to align with UNCAC recommendations.

Assessment criterion 14(a)(b):
definitions of the individual responsibilities, accountability and penalties for government employees and private firms or individuals found guilty of fraud, corruption or other prohibited practices in procurement, without prejudice of other provisions in the criminal law.

Conclusion: No gap

Qualitative analysis
Basic values and principles governing public administration, applying to all tiers of government including SOEs and parastatals, are enshrined in the Constitution. The Criminal Law Code defines corruption offences and related penalties, which apply to both the public and private sector as well as the specific offence of criminal abuse of duty as a public officer. PPDPAA provides for exclusion and declaration of ineligibility to participate in procurement of suppliers who have been convicted of offences involving corruption. There is a process for suspension and debarment of suppliers on the grounds of prohibited conduct which includes conviction for corruption related offences and unethical conduct including bribery.

The **Constitution S.194 Basic values and principles governing public administration**, provides that public administration in all tiers of government must be governed by the democratic values and principles enshrined in the Constitution including the principle that "(a) a high standard of professional ethics must be promoted and maintained". The principles listed in S.194 apply to all tiers of government, including institutions and agencies of the State, and government-controlled enterprises and other public enterprises. Companies and other commercial entities owned or wholly controlled by the State must, in addition to complying with principles set out in S.194, "abide by generally accepted standards of good corporate governance."

Provisions in the Criminal Law Code
Bribery and Corruption: Criminal Law Code, Part IX Bribery and Corruption covers the general offence of bribery (active and passive), describes corruption offences which apply to both the public and private sector. The offence

[165] https://www.unodc.org/corruption/en/country-profiles/data/ZWE.html
[166] Review of the implementation of the UNCAC, Executive Summary, Chapter III, Criminalization and law enforcement, Section 2.1, UNCOSP, November 2013, CAC/COSP/IRG/I/2/1/Add.17

of bribery is liable to a fine not exceeding USD 5,000 (five thousand) (level 14) or three times the value of any consideration obtained or given in the course of the crime, [167] or imprisonment for a period not exceeding twenty years, or both.
Fraud: Criminal Law Code, Part IV Fraud and Forgery provides for the offence of fraud by misrepresentation (which term is defined widely), which apply to both the public and private sector. The offence of fraud is liable to a fine not exceeding USD 5,000 (five thousand) (level 14) or twice the value of any property obtained as a result of the crime, [168] or imprisonment for a period not exceeding fifteen years, or both.
Concealment: Criminal Law Code, Part IX Bribery and Corruption, S.172 and 173 provide that concealment of a transaction from a principal or of a personal interest in a transaction is an offence.
Criminal abuse of duty as public officer: In addition, the Criminal Law Code, Part IX Bribery and Corruption s.174, sets out the specific offence of "criminal abuse of duty as public officer". This offence occurs where, in summary, a public officer in the exercise of his or her functions does anything or omits to do anything which he or she knows is contrary to or inconsistent with his/her duty as a public officer, "with the intention of conferring an undue or illegal benefit on someone else or of unfairly or illegally prejudicing something else.." The offence of criminal abuse of duty as public officer is liable to a fine not exceeding USD 3,000 (three thousand) (level 13), [169] or imprisonment for a period not exceeding fifteen years, or both.

Public Service Regulations 2000,[170] First Schedule categorises corruption and dishonesty as Acts of Misconduct leading to disciplinary proceedings which can result in suspension, discharge (dismissal) from the public service and permanent ineligibility for public service employment.

Exclusion, debarment and ineligibility to participate in public procurement
PPDPAA S.72 Conduct of bidders and contractors provides for exclusion of a bidder or potential bidder where they have been convicted of an offence involving corruption (which is defined by reference to the Criminal Law Code.
Part XI of the PPDPA Regs provide for debarment of contractors, including on corruption related grounds. (See analysis at 14(c)(c))
PPDPAA S.99 Authority to declare any person ineligible to be awarded procurement contract, permits PRAZ to declare a bidder, former bidder or contractor ineligible to participate in procurement proceedings in specified cases including conviction for a corruption offence and termination of contract on account of fraud.

Gap analysis

Recommendations

Assessment criterion 14(a)(c):
definitions and provisions concerning conflict of interest, including a cooling-off period for former public officials.

[167] Criminal Law (Codification and Reform) (Standard Scale of Fines) Notice, 2023 https://www.veritaszim.net/sites/veritas_d/files/SI%202023-014A%20Criminal%20Law%20%28Codification%20and%20Reform%29%20%28Standard%20Scale%20of%20Fines%29%20Notice%2C%202023.pdf
[168] Criminal Law (Codification and Reform) (Standard Scale of Fines) Notice, 2023 https://www.veritaszim.net/sites/veritas_d/files/SI%202023-014A%20Criminal%20Law%20%28Codification%20and%20Reform%29%20%28Standard%20Scale%20of%20Fines%29%20Notice%2C%202023.pdf
[169] Criminal Law (Codification and Reform) (Standard Scale of Fines) Notice, 2023 https://www.veritaszim.net/sites/veritas_d/files/SI%202023-014A%20Criminal%20Law%20%28Codification%20and%20Reform%29%20%28Standard%20Scale%20of%20Fines%29%20Notice%2C%202023.pdf
[170] Public Service Regulations, 2000 SI 1 of 2000, as amended. https://www.psc.gov.zw/wp-content/uploads/2021/04/pscreg2000.pdf

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Conclusion: High risk gap + red flag
Qualitative analysis PPDPAA S.2 defines "conflict of interest" as "a situation in which a public officer's personal or family interests may benefit, directly or indirectly, from any conduct on his or her part, or any decision he or she may make, as a public officer;". PPDPAA S.70 Conduct of Procurement Officers requires every procurement officer to avoid any conflict of interest in the exercise of his or her responsibilities. All procurement officers in all types of procuring entities are required to comply with the Code of Conduct for Procurement Officers set out in the PPDPA Regs. First Schedule which require declaration of personal interests are required to sign the Integrity Pledge (see analysis at 14(g)(a) on Codes of ethics). The Public Entities Corporate Governance Act, which applies to SOE and parastatal procuring entities includes provisions on disclosure by board members and senior staff of both direct and indirect pecuniary and property interests as well as asset declaration. The legal and regulatory framework does not include provisions requiring a "cooling-off" period preventing former public officials from involvement in public procurement matters for undue benefit, financial or otherwise. **Constitution S.196 Responsibilities of public officers and principles of leadership** requires that "(2) Public officers must conduct themselves, in public and private life, so as to avoid any conflict between their personal interests and their public or official duties, and to abstain from any conduct that demeans their office." **PPDPAA S.70 Conduct of Procurement Officers**: S.70(2) Every procurement officer shall in the exercise of his or her responsibilities as such- (c) avoid any conflict of interest; (d) act with the utmost propriety and honesty." S.71 – Regulations to provide for a code of conduct to include "the prevention of conflicts of interest in procurement." **PPDPAA S.2 Definitions,** "**conflict of interest**" means "a situation in which a public officer's personal or family interests may benefit, directly or indirectly, from any conduct on his or her part, or any decision he or she may make, as a public officer;" **PPDPA Regs. First Schedule, Code of Conduct for Procurement Officers**: R.3 General Conduct, requires that "Procurement officers must ensure they are not involved in any procurement proceedings in which they are indebted to a bidder or contractor." R.6 Integrity provides (1) "Procurement officers must exercise their official functions without consideration of their personal and private interest. Because of the need to maintain public trust, improper use of office for private gain is regarded as a serious breach of professional integrity" and requires procurement officers to declare to their line manager "any personal interest that might affect, or be seen by others to affect, their impartiality in decision making". **SOEs and Parastatals** **Public Entities Corporate Governance Act [Ch.10:31],** S.**34 Conflicts of Interest** on part of board members and staff of public entities, requires board members and senior staff to disclose both direct and indirect pecuniary interests and property interests as well as situations where private interest come into conflict with their functions a board member or member of the entity's staff. There are additional provisions applying to board members. Any person who contravenes specified provisions of PECG Act S.34 shall be guilty of an offence and liable to a fine or to imprisonment for a period not exceeding 3 months or both a fine and imprisonment (PECG Act S.34(7)). **PECG Act S.37 Declaration of assets** by board members and senior staff of public entities, also requires board members and senior staff to provide to the Office of the President and Cabinet (OPC) on an annual basis, written a declaration of all immovable property, movable property exceeding prescribed values, any business in which they have an interest or play a part in running. There are similar provisions applying to every associate of the board member or senior staff member. The Corporate Governance Unit of the OPC receives Board Minutes from public entities and reviews all Board Resolutions for compliance. Where the CGU picks up on conflicts of interest it refers those to the relevant line Ministry. **Public service – civil servants** **Public Service Regulations 2000,**[171] apply to all public service employees. The First Schedule to those Regulations categorises failure to disclose to a superior any conflict of interest as an Act of Misconduct leading to disciplinary

[171] Public Service Regulations, 2000 SI 1 of 2000, as amended.

proceedings which can result in suspension, discharge (dismissal) from the public service and permanent ineligibility for public service employment. There is, however, no clear definition in the Regulations of "conflict of interest".

No cooling off period for former public officials: the UNCAC Review 2020 notes that "There are no restrictions on public officials following resignation or retirement, except for legal practitioners." One of the recommendations made in the UNCAC Review 2020 (in line with UNCAC art.12) is to strengthen the legislative and administrative framework to prevent corruption in the private sector including by "imposing appropriate restrictions on public officials following resignation or retirement."[172] The MAPS Assessment Team was unable to find evidence of implementation of this recommendation.

Gap analysis

There is no clear definition and/or guidance on what constitutes an actual or potential "conflict of interest" in the Public Service Regulations (which apply to all public service employees). This creates the potential for legal uncertainty as to the precise nature of the act of misconduct which may lead to disciplinary proceedings.

The legal and regulatory framework does not include provisions requiring a "cooling-off" period for former public officials. This increases the risks of conflict of interest and corruption, with the potential for former public officials to intervene in public procurement matters (including using knowledge or contacts gained during their prior employment) in ways that benefit them, their relatives and business or political associates, financially or otherwise.

► This Gap is assigned a Red flag because it requires action outside the procurement sphere to address the need for a clear definition and/or explanation of an actual or potential "conflict of interest" to apply to all public service employees.

Recommendations

Introduce a clear definition and/or guidance on what constitutes an actual or potential conflict of interest, in particular to clarify the nature of an act of misconduct which may lead to disciplinary proceedings for public service employees.

Introduce provisions requiring a defined cooling off period for former public officials.

Suggestions for improvement

When clear definition and/or guidance on what constitutes an actual or potential conflict of interest and/or provisions on cooling off period have been adopted, revise the Code of Conduct for Procurement Officers to align with those changes.

Sub-indicator 14(b)
Provisions on prohibited practices in procurement documents

Assessment criterion 14(b)(a):

The legal/regulatory framework specifies this mandatory requirement and gives precise instructions on how to incorporate the matter in procurement and contract documents.

Conclusion: No gap

Qualitative analysis

The legal framework requires procuring entities to use standard bidding documents issued by PRAZ and lists the mandatory content of bidding documents including reference to restrictions on bidding arising out of conflicts of interest or anti-fraud or anti-corruption rules. The standard bidding documents contain provisions for exclusion, debarment and contract termination in the event a bidder engages in corrupt, fraudulent, collusive or coercive practices.

https://www.psc.gov.zw/wp-content/uploads/2021/04/pscreg2000.pdf

[172] State of implementation of the UNCAC, Executive Summary, Chapter II, *Private sector (art.12,* UNCOSP, August-September 2020, CAC/COSP/IRG/II/2/1/Add.15

Use of standard contract documents is not mandatory in all cases, although the legal framework requires that where possible a procurement contract must be based on the model contract, which contains relevant provisions on prohibited practices. (see analysis and Gap at 2(c)(a))

Bidding documents: PPDPAA S.20 Procurement preparation, requires that only standard bidding documents that are produced and issued by PRAZ shall be used.
PPDPA Regs. R.20 Content of bidding documents, lists information required to be included in bidding documents, which includes at (1)(q) "any restrictions on bidding arising out of conflicts of interest or anti-fraud or anti-corruption rules;"
PPDPAA S.58(4) Request for proposals method, lists information required to be included in the request for proposals provided to short-listed bidders, which includes "(h) notice of any rules, restrictions or precautions against conflicts of interest, fraud or corruption, including potential debarring of persons who contravene those rules, restrictions or precautions from participating in future procurements; and (i) any other information that maybe prescribed or stated in standard bidding documents issued by the Authority."

Contract documents: S.78(1) provides that "where possible", a procurement contract must be based on the appropriate model contract set out or referred to in standard bidding documents developed by PRAZ. Therefore, their use is not mandatory in all cases. *This is identified as a Gap at 2(c)(a) and is thus not repeated in the findings under this criterion 14(b)(a)*

Gap analysis

Recommendations

Assessment criterion 14(b)(b):
Procurement and contract documents include provisions on fraud, corruption and other prohibited practices, as specified in the legal/regulatory framework.

Conclusion: No gap

Qualitative analysis
All standard bidding documents and contract documents (general contract conditions) reviewed by the MAPS Assessment Team contain provisions for exclusion, debarment and contract termination in the event a bidder engages in corrupt, fraudulent, collusive or coercive practices.

MAPS Assessment team reviewed SBDs and General Contract Conditions available from the PRAZ website "downloads" page. [173] Examples of provisions in Standard bidding document (SBD) and standard contract document are shown below.
Standard Bidding Document for Goods, Part 1: Bidding procedures , "Corrupt Practices" confirms that the procuring entities will reject a recommendation for award "if it determines that the Bidder recommended for award has, directly or through an agent, engaged in corrupt, fraudulent, collusive or coercive practices in competing for the Contract or been declared ineligible to be awarded a procurement contract under section 99 of the [PPDPAA]" and requires any conflict of interest on the part of the Bidder to be declared.
General Conditions of Contract for Procurement of Non-Complex Works, S.48 Fraud and Corruption sets out provision providing for recommendations for debarment and contract termination for corrupt, fraudulent, collusive, coercive or obstructive practices (all defined terms) in competing for or executing the contract and for removal of employees in the same situations. S.47 Termination allows for termination where the contractor has "in the

[173] PRAZ website "Downloads" page, Standard Bidding Document section
https://www.praz.org.zw/downloads/

judgement of the Procuring Entity, engaged in corrupt or fraudulent practices in competing for or in executing the Contract." as well as where the contractor is suspended or debarred including on grounds of corruption.

Gap analysis

Recommendations

Sub-indicator 14(c)
Effective sanctions and enforcement systems

Assessment criterion 14(c)(a):
Procuring entities are required to report allegations of fraud, corruption and other prohibited practices to law enforcement authorities, and there is a clear procedure in place for doing this.

Conclusion: No gap

Qualitative analysis
PPDPAA S.72 Conduct of bidders and contractors, includes provisions requiring a procuring entity to report to the police where it ascertains that a bidder or potential bidder is in breach of obligations under the PPDPAA or a public contract, or has been involved in collusive behaviour or is guilty of unethical conduct that amounts to an offence under any law.
Treasury Instructions: S.158 (5) Whenever there is any suspicion that acts have been or are being performed involving public moneys or state property which may involve dishonesty, criminal intent, or corruption the Head of Office shall immediately report the matter to the police, Anti-Corruption Commission and their Accounting Officer. Any report made to the police shall be the subject of a written acknowledgement which shall be forwarded by the Head of Office to their Accounting Officer.
The MAPS Assessment Team, in direct discussion with PEs, asked about the procedure for raising concerns in the event that they identify suspected prohibited practices in procurement. The procurement professionals involved in that conversation confirmed that the procedure to be followed requires internal audit to be notified and matters of concern will be referred up through the institution and reported to external authorities as necessary.
See also, analysis at 12(b)(d) on reporting lines for suspected fraud and Fraud Investigation Procedure set out in the Internal Audit Manual.

Gap analysis

Recommendations

Assessment criterion 14(c)(b):
There is evidence that this system is systematically applied and reports are consistently followed up by law enforcement authorities.

Conclusion: No gap

Qualitative analysis
In discussions with the MAPS Assessment Team, the National Prosecuting Authority confirmed that it receives referrals for prosecution of allegations of fraud, corruption and other prohibited practices from both the Zimbabwe Republic Police and the Zimbabwe Anti-Corruption Commission. Referrals (dockets) may result in criminal prosecutions under the Criminal Law Code (in the case of public officials, most likely abuse of duty), fraud and corruption charges under the Prevention of Corruption Act and, through its Asset Forfeiture Unit, actions to preserve, seize and recover assets under the Money Laundering and Proceeds of Crime Act.
See also, analysis at 14(c)(d).

Gap analysis

Recommendations

Assessment criterion 14(c)(c):
There is a system for suspension/debarment that ensures due process and is consistently applied.

Conclusion: No gap

Qualitative analysis
There is a system for debarment with clear procedural rules for the conduct of the process and the Debarment Committee, which ensure due process. Review of samples of the debarment decisions indicate that the system is consistently applied.

Part XI of the PPDPA Regs provide for debarment of contractors, including on corruption related grounds. R.73(2) provides that before reaching a decision of recommending a contractor for debarment, and before imposing any sanction on a bidder, the bidder or contractor must be given a reasonable opportunity to make representations. Grounds for debarment are set out in S.72(3) of the PPDPAA and the process for and decision on debarment involves establishing a debarment committee in terms of R.72. PRAZ provides secretariat services to the debarment committee. The Debarment Committee prepares written decisions on applications for debarment. Review of samples of the debarment decisions indicate that the system is consistently applied.
See below for data on applications for debarment and number of debarments upheld by the Debarment Committee.

Year	Total Number of applications	Number of debarments upheld
2022	18	14
2023	10	5
2024	10	8
2025	8	2

Source: PRAZ Secretariat

There is a debarment list on the PRAZ website accessible from the PRAZ homepage by clicking the “Debarment List” tab.[174]
See suggestion to publish more information on debarment decisions at 1(d)(c).

Gap analysis

Recommendations

Assessment criterion 14(c)(d):
There is evidence that the laws on fraud, corruption and other prohibited practices are being enforced in the country by application of stated penalties.*

Conclusion: No gap

Qualitative analysis
There is evidence that laws on fraud, corruption and other prohibited practices are being enforced. Available data demonstrates referrals to the National Prosecuting Authority by ZACC, court cases and convictions. There is also a system for debarment of suppliers and there is a list of published online on the PRAZ website of suppliers who have been debarred, either temporarily or permanently.

[174] https://www.praz.org.zw/debarment-list/. At December 2025, 10 companies are listed on the PRAZ website as debarred of which 2 are permanently debarred.

Prosecutions and convictions: There is evidence that firms/individuals are being prosecuted for fraud and corruption in public procurement. According to ZACC Annual Report for 2024, during 2024 ZACC referred 343 dockets to the National Prosecuting Authority for prosecution. Of the cases referred to NPA, 62% were for fraud related crimes and 9% were for criminal abuse of duty. In 2024 a total of 58 cases went to full trial with a conviction rate of 74%. In 2024, 2 government officials were found guilty of fraud and corruption in public procurement. In 2025, 2 firms/individual suppliers and 4 government officials were found guilty of fraud and corruption in public procurement. According to ZACC's Annual Report 2024, there is a significant backlog of cases in the courts.

According to the ZACC Annual Report 2024, ZACC collaborated with ZIMRA, the Council for Legal Education (CLE)and the Agricultural and Rural Development Agency to conduct joint investigations into, respectively: the civil servants motor vehicle rebate scheme, fraudulent attainment of CLE certificates, and abuse of agricultural inputs.
Debarred/suspended suppliers: There is a debarment list on the PRAZ website accessible from the PRAZ homepage by clicking the "Debarment List" tab.[175] As of December 2025, 2 firms are listed as permanently debarred from participation in public procurement. The published debarment list also shows 8 firms as temporarily debarred on the basis that they are guilty of "prohibited conduct", in some cases with further detail provided. The periods of temporary debarment range from 3 to 36 months. There is no specific reference to any of the firms being debarred on the grounds of conviction for fraud/corruption related offences. There is reference in some cases to the possibility of reduction in the period of debarment where a firm satisfies specified conditions in a remedial plan.

The MAPS Assessment Private Sector Survey asked the question "In your opinion, how common is it to use unethical practices – such as making gifts or information payment- to secure public contracts?". 60% of respondents were of the view that it is "very common" or "quite common".

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 14(c) Assessment criterion (d):*
*- **Firms/individuals found guilty of fraud and corruption in procurement: number of firms/individuals prosecuted/convicted.***

Firms/individuals found guilty of fraud and corruption in procurement	2022	2023	2024	2025
Number of firms/individuals prosecuted for fraud and corruption in public procurement	0	0	2	0
Number of firms/individuals found guilty of fraud and corruption in public procurement	0	0	0	2

Source: Zimbabwe Anti-Corruption Commission (ZACC) (February 2026)

- ***Firms/individuals found guilty of fraud and corruption in procurement: number of firms/individuals prohibited from participation in future procurements (suspended/debarred).***
The debarment list on the PRAZ website shows 2 firms as permanently debarred from participation in public procurement and 8 firms as temporarily debarred for periods of between 3 and 36 months (see qualitative analysis above).

- ***Government officials found guilty of fraud and corruption in public procurement: number of officials prosecuted/convicted.***

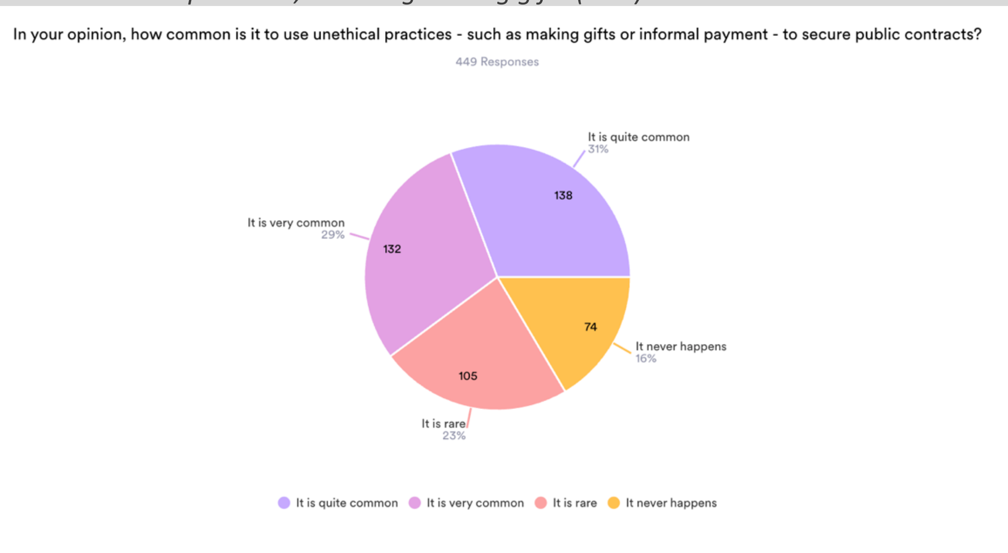
[175] https://www.praz.org.zw/debarment-list/. At December 2025, 10 companies are listed on the PRAZ website as debarred of which 2 are permanently debarred.

Government officials found guilty of fraud and corruption in public procurement	2022	2023	2024	2025
Number of government officials prosecuted for fraud and corruption in public procurement	5	9	12*	22*
Number of government officials found guilty of fraud and corruption in public procurement	2	1	3	4

**Assume cases are ongoing – see note in qualitative analysis above on court backlog and % successful conviction rates*

Source: Zimbabwe Anti-Corruption Commission (ZACC) (February 2026)

- Gifts to secure public contracts: number of firms who consider that to secure government contracts it is necessary to use unethical practices, including making gifts (in %).



Source: Private Sector Survey

Gap analysis

Recommendations

Sub-indicator 14(d)
Anti-corruption framework and integrity training

Assessment criterion 14(d)(a):
The country has in place a comprehensive anti-corruption framework to prevent, detect and penalise corruption in government that involves the appropriate agencies of government with a level of responsibility and capacity to enable its responsibilities to be carried out.*

Conclusion: High risk gap + red flag

Qualitative analysis
The Constitution of Zimbabwe provides for the establishment and composition of the Zimbabwe Anti-Corruption Commission (ZACC) with defined functions and powers set out in the Constitution and the Anti-Corruption Commission Act. ZACC is under-resourced. Other key institutions are the National Prosecuting Authority, the Zimbabwe Republic Police, the Judicial Service Commission which has established specialised anti-corruption courts and Zimbabwe Revenue Authority. Important supporting institutions include the Office of the Auditor General,

Internal Audit function, Corporate Governance Unit and PRAZ and institutions involved in anti-money laundering, proceeds of crime and asset forfeiture. (see analysis at 14(g)).
The launch of the first National Anti-Corruption Strategy (2020-2024) (NACS1) and implementation Action plan was a huge step forward, providing for a comprehensive multi-agency anti-corruption framework with assigned responsibilities for appropriate agencies of government. Much has been achieved but lack of resources had a negative impact on NACS implementation.
32% of respondents in the MAPS Assessment Private Sector Survey are of the opinion that the current anti-corruption framework and measures implementing that framework are not effective in preventing, detecting and penalising corruption public procurement. In 2024, Zimbabwe ranked 158 out of 180 countries in Transparency International's Corruption Perception Index (CPI).[176]

Institutional framework
Zimbabwe Anti-Corruption Commission (ZACC): The Constitution of Zimbabwe, Chapter 13 Institutions to Combat Corruption and Crime, S.254 to 257 provides for the establishment and composition of the Zimbabwe Anti-Corruption Commission (ZACC). These sections of the Constitution also prescribe ZACC's functions, application to ZACC of certain provisions in Chapter 12 of the Constitution (General provisions on Independent Commissions Supporting Democracy) and reporting requirements. The Anti-Corruption Commission Act (Ch: 9:22) (ACC Act) commenced on 15 and establishes ZACC as a body corporate. ACC Act S.11 to 13 set out the objects, functions and powers of ZACC, with further specific powers listed in the Schedule to the ACC Act. ZACC's ACC Act S.18 Funds of Commission, provide that the funds of ZACC are from moneys appropriated for the purpose by Parliament. Audit reports of the Auditor-General on ZACC are thus included in the Auditor-General's annual reports on Appropriation Accounts, Finance and Revenue Statements and Fund Accounts. ACC Act S.13 confirms that ZACC "shall exercise it powers concurrently with those of the police." ZACC may request the police to assist in investigating complex cases.
Functions/powers of ZACC: The functions and powers of ZACC set out in the Constitution and ACC Act include: investigation of corruption in the public and private sectors; direction of the Commissioner-General of Police to investigate cases of suspected corruption; referral of matters to the National Prosecuting Authority; receipt and consideration of complaints from the public; public education and engagement; assistance in the formulation of practices, systems and procurement procedures, and; making recommendations to the Government on measures to enhance integrity and accountability and prevent improper conduct in the public and private sector.
ZACC Human Resources: ZACC is under-resourced. ZACC's authorised establishment for 2023 was 395, with 178 posts filled. ZACC's authorised establishment for 2024 was 409, with 222 posts filled.

Other key institutions:[177]
National Prosecuting Authority: Established under Constitution of Zimbabwe S.258 and governed by the National Prosecuting Authority Act. NPA, led by the Prosecutor General is responsible for prosecuting crimes on behalf of the State including corruption cases.
Zimbabwe Republic Police: Established under Constitution of Zimbabwe S.219 and governed by the Police Act [Ch.11:10]. ZRP has an anti-corruption unit (Police Anti-Corruption Unit (PACU) which investigates corruption crimes and works with ZACC and NPA.
Judicial Service Commission – specialised anti-corruption courts: Established under Constitution of Zimbabwe S.189. Specialised anti-corruption courts were established in 2018 as a division of the High Court in Harare and Bulawayo. Since 2020 they are operational in all 10 provinces at magisterial level. These courts are intended to provide an expedited trial process for corruption cases and provide expertise in handling complex financial matters.
ZIMRA: Governed by the Revenue Authority Act [Ch.23:11], which may refer cases of suspected corruption to ZACC.

[176] https://www.transparency.org/en/cpi/2024/index/zwe
[177] A Compendium of Anti-Corruption Sector Institutions in Zimbabwe, TIZ, 2024. https://www.tizim.org/wp-content/uploads/2024/12/TIZ-A-COMPENDIUM-OF-ANTI-CORRUPTION-SECTOR-INSTITUTIONS-IN-ZIMBABWE.pdf

Other supporting institutions include the Office of the Auditor General, Internal Audit function, Corporate Governance Unit, PRAZ (in particular through its monitoring and evaluation function) and institutions involved in anti-money laundering, proceeds of crime and asset forfeiture (see analysis at 14(g)).

The National Development Strategy 2 (January 2026 – December 2030) (NDS2) paragraphs 1795 to 1864 Combatting Corruption confirms that strategies to strengthen the enforcement of anti-corruption and anti-money laundering laws will be prioritised and notes that "role clarity between anti-corruption institutions will be clearly defined to enable seamless execution of their mandates."

National Anti-Corruption Strategy (2020-2024) (NACS1) and preparation of NACS2: In July 2020, Zimbabwe launched its first National Anti-Corruption Strategy (2020-2024) (NACS1). NACS1 is intended to serve as a guide for Government, the business sector and civil society organisations, to help coordinate and support their efforts to curb corruption. It also provides a basis for various Anti-Corruption Agencies (ACAs) in the country to coordinate and deliver more effectively in respect of enforcement and prevention of corruption. It confirms the need to synergise all anti-corruption initiatives to enhance effectiveness. NACS1 identifies the following key institutions in the fight against corruption: Judiciary, Public Service Commission (PSC), Zimbabwe Anti-Corruption Commission (ZACC), National Prosecuting Authority (NPA), Office of the Auditor General and Public Protector (ombudsman). The media, civil society and the international community are identified as other actors. NACS1 included an initial Action Plan for implementation with indicators/outcomes to provide the basis for ongoing monitoring and evaluation of implementation progress and impact. Implementation and coordination of NACS1 was the responsibility of the National Anti-Corruption Strategy Steering Committee (NACSSC). Monitoring was carried out by 6 NACSSC sub-committees (monitoring groups) scheduled to meet twice yearly. The NACS1 mandate came to an end in July 2024 and an Evaluation Report (NACS1 Evaluation Report) [178] was prepared using the sub-committee implementation reports and in-person consultations in November 2024. Preparation of the successor strategy, NACS2 is underway, with consultation and validation events conducted in the third and fourth quarters of 2025.
One of the findings of the NACS1 Evaluation Report was the lack of specific budget for NACS implementation which impacted the availability of resources. This was highlighted by all 5 of the sub- committees that took part in the consultations for preparation of the report. Lack of resources also had a negative impact on the activities of the sub-committees. The lack of specific budget and constrained resources resulted in ZACC taking responsibility for most of the activities, rather than shared responsibility as intended. According to TI's Paper on NACS1,[179] NACS2 needs to be co-hosted between ZACC and other anti-corruption institutions as this "can increase the effectiveness in terms of political will in the implementation of NACS…".

Perceptions of corruption and effectiveness of the anti-corruption framework
Corruption Perception Index: NACS1 acknowledges that despite a number of corruption measures being taken by the Government over a number of years, "lack of effective political will in the past and public support have meant corruption remained high in the country" and "the corruption ranking for Zimbabwe both regionally and internationally has been very poor." NACS1 notes that according to Transparency International's Corruption Perception Index (CPI) scores, Zimbabwe's annual average for the period 1998 to 2018 was 22/100 and in 2018 Zimbabwe ranked 160 out of 175 countries. Zimbabwe's CPI score in 2023 was 24/100, dropping to 21/100 in 2024. In 2024, Zimbabwe ranked 158 out of 180 countries.[180]
The **MAPS Assessment Private Sector survey** asked the question "How effective do you think the current anti-corruption framework and measures implementing that framework are in preventing, detecting and penalising

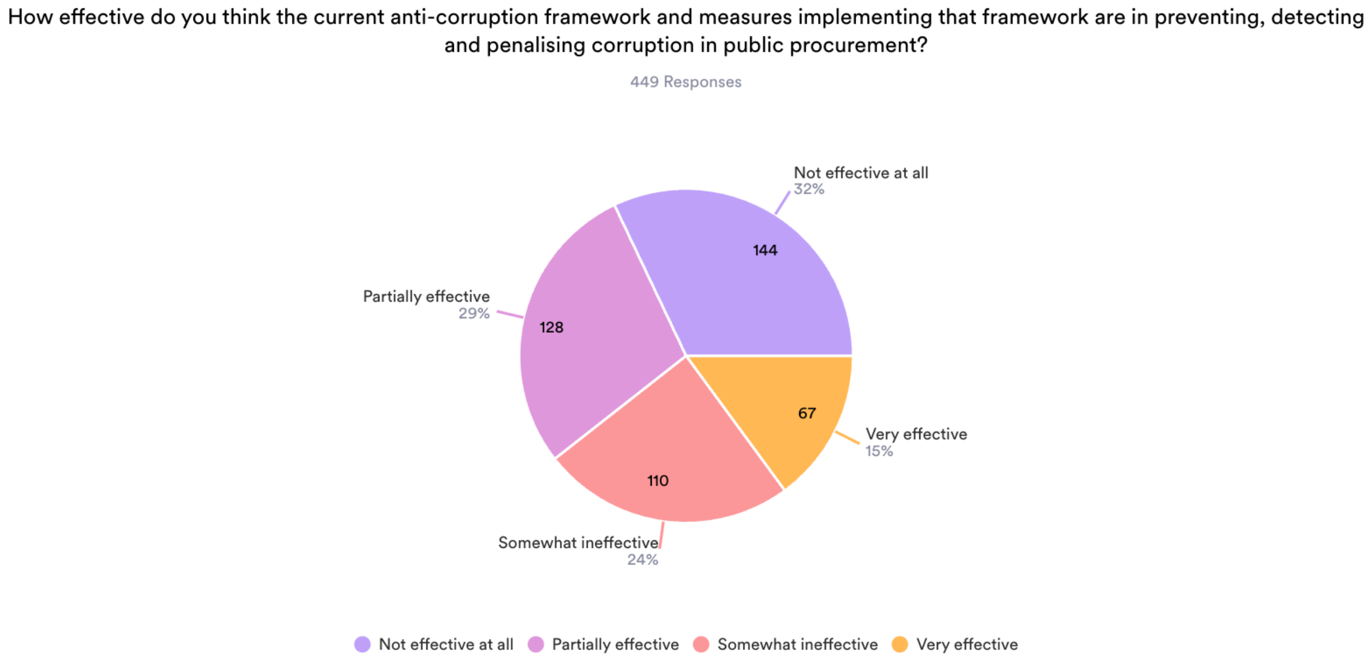
[178] Evaluation Report of the Zimbabwe National Anti-Corruption Strategy (2020-2024) prepared for ZACC, November 2024.
[179] Seminar Paper No.2/2024 Reflections on the National Anti-Corruption Strategy (NACS-1 2020-2024) and Proposed Improvements for the Successor Strategy.
https://www.tizim.org/sdm_downloads/seminar-paper-2-2024-reflections-on-the-national-anticorruption-strategy-nacs-1-2020-2024-and-proposed-improvements-for-the-successor-strategy/

[180] https://www.transparency.org/en/cpi/2024/index/zwe

corruption public procurement?" 15% of respondents said that it is "very effective" and 32% said it is "not effective at all" (total number of responses was 449). The **MAPS Assessment CSO Survey** asked the same question. 10% of respondents said that it is "very effective" and 20% said it is "not effective at all" (total number of responses was 10).

Quantitative analysis

**Recommended quantitative indicator to substantiate assessment of sub-indicator 14(d) Assessment criterion (a):*
- percentage of favourable opinions by the public on the effectiveness of anti-corruption measures (in % of responses).
Source: Survey.



Source: Private Sector Surveyt

Gap analysis
There is provision for a comprehensive anti-corruption framework, and the first National Anti-Corruption Strategy (NACS1) provides a strong basis for positive developments to prevent, detect and penalise corruption. However, the anti-corruption framework has insufficient capacity and resources for institutions, including ZACC, to fully deliver on their assigned responsibilities and full implementation of NACS1 was hampered by budgetary constraints. These limitations compromise the integrity of the public procurement system which is a high-risk area for corruption.
► This Gap is assigned a Red flag because it requires governmental and Parliamentary actions to ensure sufficient capacity and resources for institutions to fully deliver on their assigned responsibilities and these activities lie outside the procurement sphere

Recommendations
Commit appropriate levels of budget to ensure that institutions are able to fully deliver on current assigned responsibilities and future implementation of NACS2.

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Assessment criterion 14(d)(b):
As part of the anti-corruption framework, a mechanism is in place and is used for systematically identifying corruption risks and for mitigating these risks in the public procurement cycle.

Conclusion: High risk gap + red flag

Qualitative analysis
Opportunities for corruption arise at all stages of the procurement cycle: at the policy formulation stage, project planning and selection phase, through the bidding process and during contract implementation. An effective mechanism for identifying and mitigating corruption risks is multi-facetted, dependent on a number of factors including good record keeping and high-quality comprehensive data, clear governance structures, well-functioning procurement and PFM systems and a professionalised procurement workforce. Analysis elsewhere in this MAPS Assessment has identified serious shortcomings in procurement record keeping, a lack of comprehensive procurement data and a poorly functioning PFM system. The Auditor-General consistently reports audit findings in respect of the procurement of goods and services and flags weak internal controls and the need to strengthen due diligence. ZACC compliance and system reviews and spot-checks identify procurement as one of the main areas of non-compliance and systems gaps.[181] The Procurement Manual is silent on mechanisms for identifying and mitigating corruption risks.

Gap analysis
There is currently no standardised mechanism in place to systematically identify corruption risks in the public procurement cycle and for mitigating those risks, thus reducing the effectiveness of the oversight framework and reducing transparency and integrity of the public procurement system.
► This Gap is assigned a Red flag because creation of an effective mechanism will require high levels of inter-institutional cooperation to ensure interoperability between eGP and other systems, including PFMS and in the context of the development of NACS2 which is led and coordinated by ZACC. This cannot be achieved solely through actions in the procurement sphere.

Recommendations
Combined recommendations for 14(d)(b) and 14(d)(d)

Stakeholder institutions will need to work together to develop an effective mechanism for identifying and mitigating risks in the procurement cycle. An effective mechanism for identifying and mitigating corruption risks is multi-facetted, dependent on a number of factors including good record keeping and high-quality comprehensive data, clear governance structures, well-functioning procurement and PFM systems and a professionalised procurement workforce.

Development of the mechanism may be incremental. Adoption of the eGP system provides a significant opportunity to use data analytics to flag and manage corruption risks, both for individual procurements and for the public procurement system. Critical data will need to be identified and collected and full adoption of all eGP system modules and use by all PEs will be essential to ensure reliable and comprehensive datasets for analysis. Interoperability between eGP and other systems, and PFMS in particular, would likely enhance the effectiveness of the mechanism.

Assessment criterion 14(d)(c):
As part of the anti-corruption framework, statistics on corruption-related legal proceedings and convictions are compiled and reports are published annually.

Conclusion: Medium risk gap

[181] ZACC Annual Report 2023, s.4.2.1. ZACC Annual Report 2022, s.4.2.

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Qualitative analysis ZACC compiles and publishes data on corruption-related legal proceedings in its annual reports. ZACC Annual Report 2023 records a total of 41 court cases concluded in 2023, with 29 convictions and 12 acquittals. ZACC Annual Report 2022 records a total of 32 court cases concluded in 2022, with 23 convictions and 9 acquittals. ZACC Annual Report 2024 was not available by the cut-off date for the MAPS Assessment document review.[182] As noted at 14(f)(a), the ZACC website is not functioning. This means that published Annual Reports are currently not accessible to the public from a single source online.
Gap analysis ZACC Annual Reports containing current and historic statistics on corruption-related legal proceedings and convictions are not available from the ZACC website. Non-availability of annual statistics from a single, easily accessible online location reduces transparency and public awareness and may hinder informed dialogue on corruption related issues.
Recommendations Ensure timely publication of current and consolidated historic statistics and reports on corruption-related legal proceedings and convictions at an accessible online location.
Assessment criterion 14(d)(d): Special measures are in place for the detection and prevention of corruption associated with procurement.
Conclusion: Medium risk gap
Qualitative analysis Significant efforts have been made during the NACS1 mandate to raise public awareness and educate citizens on the dangers of corruption and the importance of reporting it. There has been an increase of public reporting of potential corruption through ZACC's anti-corruption hotlines and digital platforms. (see analysis at 14(f)(a)). Prosecution of procurement related corruption and the presence of specialist anti-corruption courts combined with media coverage of prosecutions may act as a deterrent. Detection of corruption within the procurement cycle is currently mainly dependent on internal controls and external audits. (see analysis at 14(d)(b)). Special measures to detect and prevent procurement corruption generally focus on transparency, data analysis and strong oversight mechanisms. Weak institutional capacity and a lack of robust, consolidated procurement and PFM data mean that these special measures are not a feature of the current anti-corruption framework. The roll out of the eGP system will increase transparency, offering greater opportunities for oversight. Data available through the eGP system (when it is fully in use and providing the relevant data is collected) can be used to both detect and prevent corruption. In parallel, significant improvements in PFM budget and expenditure controls and the PFM system are required to enhance the potential for pro-active detection and prevention of corruption in procurement. (see analysis at 4(a)(b)).
Gap analysis Special measures such as data-driven analysis to detect and prevent corruption associated with procurement are not currently a feature of the anti-corruption framework thus reducing the likelihood of consistent identification of corrupt practices and limiting opportunities to flat potential corruption risks and effectively manage those risks.
Recommendations See combined recommendations at 14(d)(b).

[182] 31 December 2025.

Assessment criterion 14(d)(e):
Special integrity training programmes are offered and the procurement workforce regularly participates in this training.

Conclusion: No gap

Qualitative analysis
Integrity training is generally incorporated as a component of training curricular for personnel of public institutions rather than as a stand-alone programme. NACS 1 identified the need to ensure participation of public servants at periodic training courses on ethical and behavioural norms and noted that some Training of Trainers had been conducted, and the Public Service Commission (PSC) had developed a training manual on ethics and integrity. Ethics and integrity are an integral part of the standard training programme for civil servants all of whom are required to sign the integrity pledge (see analysis at 14(g)(a)).
The procurement Training Needs Analysis conducted for PRAZ recommended that hard skills training of PMU practitioners should include focus on ethics in public procurement and conflicts of interest. Core training programmes offered by SAPPTA include a 3 day course on Ethics and Integrity in Public Procurement. PRAZ includes integrity training as part of its tailored training courses. The online e-learning Procurement Sensitisation course offered by PRAZ includes a unit on “Transparency and Integrity”.

In direct discussions, MAPS Assessment Team asked representatives of PEs (MDAs, Local Authorities and parastatals/SOEs) whether procurement professionals receive training on identifying corruption risks in procurement. Those present confirmed that they do not receive such training and would be interested in participating should this type of training be offered.

Gap analysis

Recommendations

Suggestions for improvement
Consider offering specialised sector focussed integrity training programmes on a stand-alone basis, to include training on identification and handling of corruption risks. This may be tied in with increased availability of eGP data which can be used to identify potentially corrupt behaviours provided that those reviewing available data receive appropriate training.

Sub-indicator 14(e)
Stakeholder support to strengthen integrity in procurement

Assessment criterion 14(e)(a):
There are strong and credible civil society organisations that exercise social audit and control.

Conclusion: No gap

Qualitative analysis
There are respected and credible civil society groups that have a procurement focus within their agendas and actively participate in debate on public procurement, including through reports and other publications which are publicly available.
The 2024 Afrobarometer survey confirmed a relatively high level of trust in NGOs and CSOs, with 38.8% of respondents saying that they trusted them “a lot” and 35.5% “somewhat”. BTI Country Report 2024 refers to the strength of Zimbabwe’s civil society and comments that despite difficult circumstances, “civil society has managed to influence government agenda setting, policy formulation and implementation in several ways, including through litigation, activism, monitoring mechanisms and policy discussions.” It also references a strong legal civil society.

This is consistent with other reports, including for example the International Centre for Not-For-Profit Law Civic Freedom Monitor[183] which notes that "Civil society in Zimbabwe has a long history of engagement in humanitarian, developmental, and political spheres. Despite ongoing hostility and suspicion by the state, civil society organisations (CSOs) have been instrumental in advocating for reforms". Transparency International Zimbabwe (TIZ)is particularly prominent in terms of reporting on anti-corruption procurement related issues, including a detailed critique of NACS1 with proposed improvements for the successor strategy published in 2024. TIZ is not alone in its activities in this sphere. The media (both state-owned and independent) frequently reports on matters arising in the public procurement sphere, including legal and procurement system related changes, public engagement events as well prosecution and conviction on procurement related corruption charges. The Media Institute of Southern Africa (MISA) Zimbabwe Annual Report 2024[184] comments that the media landscape "shows an encouraging increasing diversity" but remains dominated by state-controlled media. MISA also reports also notes that "[c]itizens are increasingly utilising the Freedom of Information Act to fulfil their right to access information on issues of concern, thereby promoting accountability and transparency in the administration of public resources."[185] The Freedom of Information Act was Gazetted in July 2020 and Freedom of Information (General) Regulations were enacted under SI 229 of 2021 in September 2021. As noted in 14(d)(a) membership of the NACS Steering Committee (NACSSC) included the National Association of Non-Governmental Associations (NANGO), Zimbabwe Union of Journalists, Law Society of Zimbabwe and trade unions.
Gap analysis
Recommendations
Assessment criterion 14(e)(b): There is an enabling environment for civil society organisations to have a meaningful role as third-party monitors, including clear channels for engagement and feedback that are promoted by the government.
Conclusion: High risk gap + red flag
Qualitative analysis Zimbabwe's Constitution explicitly guarantees freedom of expression and freedom of the media (S.61) and access to information (S.62) but in practice the environment for civil society organisations to have a meaningful role as third-party monitors is constrained. **Press freedom:** The World Press Freedom Index ranks Zimbabwe at 106 out of 180 countries, up from 116/180 in 2024.[186] The MISA Zimbabwe Annual Report notes that the media landscape "shows an encouraging increasing diversity" but remains dominated by state-controlled media. It also flags the continuing impact of "extremely harsh laws" commenting that the "amended penal code and Official Secrets Act and the new Cyber Security and Data Protection Act continue to hamstring journalism. In theory, the confidentiality of sources is protected by law, but

[183] https://www.icnl.org/resources/civic-freedom-monitor/zimbabwe, updated November 11, 2025.
[184] MISA Zimbabwe 2024 Annual Report
https://zimbabwe.misa.org/2025/04/26/misa-zimbabwe-2024-annual-report-now-available/

[185] State of the Media Report Zimbabwe 2024, MISA
https://zimbabwe.misa.org/2025/06/04/misa-zimbabwe-state-of-the-media-report-now-available/
[186] World Press Freedom Index 2025
https://rsf.org/en/index

that hasn't been the case in practice." The UN Human Rights Committee According to UNESCO Report on the State of Press Freedom in Southern Africa 2025,[187] "Hostility against independent journalism is intensifying in Zimbabwe with investigative reporting facing increasing scrutiny and pushback from political and military elites, stifling critical voices and undermining press freedom."

Civil Society: The International Centre for Not-For-Profit Law (ICNL) Civic Freedom Monitor[188] referenced in 14(e)(b) notes that "While the Constitution of Zimbabwe protects the freedoms of association, expression, and assembly, the exercise of these rights is undermined by restrictive laws, politically motivated enforcement, and administrative barriers. The government has routinely used legal tools to monitor, harass, and limit the operations of CSOs—especially those engaged in governance, human rights, and election-related work". The results of ZimRights' 2024 State of Civic Space Report[189] based on a survey of 67 CSOs concluded that in terms of civic space, most respondents classified the environment as either "obstructed" (34%) or "repressed" (23.9%), with only 14.9% feeling that the space remains "open."
ICNL and ZimRights are just two of many sources identified by the MAPS Assessment team which have flagged significant concerns in respect of the controversial Private Voluntary Organisations Amendment Act 2025, (PVO Amendment Act)[190] which was signed into law in April 2025. This Act amends the Private Voluntary Organisations Act [Ch.17:05] (PVO Act)[191] which provides rules on registration, internal governance and funding of PVOs as well anti-money laundering legislation, the Criminal Law Code and social security legislation. The Government has maintained that the legislation is necessary to comply with FATF recommendations on anti-money laundering and terrorist financing and to ensure that PVOs do not undertake political lobbying.[192] According to MISA, commenting on the draft Bill, "critics of the Bill believe it is intended to close the democratic space and interfere with the operations of NGOs".[193] In March 2025, the UN Human Rights Committee (UNHRC) recommended (in summary) that Zimbabwe consider abandoning the enactment of the PVO Amendment Bill, returning it to Parliament and convene wide consultation with relevant stakeholders, observing that the Bill "….contains provisions that could potentially restrict civic space and have a chilling effect on the exercise of the right to freedom of association and assembly by civil society organisations and human rights defenders." [194] [195] Court challenges have been filed in respect of the PVI Amendment Act.[196]

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[187] https://unesdoc.unesco.org/ark:/48223/pf0000393618

[188] https://www.icnl.org/resources/civic-freedom-monitor/zimbabwe, updated November 11, 2025.

[189] See also: ZimRights CSO survey results: The State of Civic Space in Zimbabwe, 2024.
https://www.fidh.org/IMG/pdf/2024_state_of_civic_space_report_expanded_version.pdf

[190] https://www.veritaszim.net/sites/veritas_d/files/Private%20Voluntary%20Organisations%20Amendment%20Act%202024%2C%20Act%20no.%2001.pdf

[191] https://www.veritaszim.net/sites/veritas_d/files/Private%20Voluntary%20Organisations%20Act%20Cap%2017%2C05%20%28Consolidated%20to%202025.04.11%29.pdf

[192] Private Voluntary Organisations Amendment Bill, explanatory Memorandum to the Draft Bill
https://veritaszim.net/sites/veritas_d/files/PRIVATE%20VOLUNTARY%20ORGANISATIONS%20AMENDMENT%20BILL%20with%20Committee%20Stage%20Amendments.pdf

[193] MISA Zimbabwe Annual Report 2024
https://zimbabwe.misa.org/2025/04/26/misa-zimbabwe-2024-annual-report-now-available/

[194] UN Human Rights Council, Universal Periodic Review – Zimbabwe
https://www.ohchr.org/en/hr-bodies/upr/zw-index

[195] Centre for Civil and Political Rights
https://ccprcentre.org/ccprpages/zimbabwe-concerns-raised-over-civic-space-restrictions-and-political-participation

[196] ZLHR challenge in High Court May 2025
https://www.zlhr.org.zw/zlhr-challenges-repressive-provisions-of-pvo-amendment-act/
Constitutional court challenge filed 24 December 2025
https://cite.org.zw/citizen-takes-pvo-law-to-constitutional-court/?fbclid=IwY2xjawPMyzJleHRuA2FlbQIxMABzcnRjBmFwcF9pZBAyMjIwMzkxNzg4MjAwODkyAAEeAjZxJyICHKGP452YadhQSDHdc2amoVoIbWee4D8tKvnQIvPevCnqh2ZGOh8_aem_n9c4ZLlgMrKHiWuDmylWQw

Gap analysis
The environment for civil society organisations to have a meaningful role as third-party monitors of the public procurement ecosystem is constrained.
► This Gap is assigned a Red flag because it requires a whole of government approach.

Recommendations
Government should actively encourage and support strong and credible civil society organisations to exercise meaningful social audit and control in public procurement as an important element in creating and maintaining a sound procurement environment and building trust. The introduction eGP, with the attendant increase in publicly available data provides a focused opportunity to develop and implement relevant measures. Civil society should be engaged in discussions on the ongoing roll-out of eGP as well as being involved in relevant training and other capacity building to enable them to monitor public procurement (see 11(a)(b) & (c)). Formal channels for ongoing regular engagement and feedback on public procurement by civil society should be promoted and actively supported by government to further enhance the quality of debate and assist in improving integrity in public procurement.

Assessment criterion 14(e)(c):
There is evidence that civil society contributes to shape and improve integrity of public procurement.*

Conclusion: No gap

Qualitative analysis
As noted at 14(e)(a) & (b) there is a strong and credible civil society which has managed to influence government agenda setting, policy formulation and implementation in a constrained environment. Civil society organisations with an anti-corruption agenda and demonstrable interest in public procurement include Transparency International Zimbabwe (TIZ), Centre for Investigative Journalism Zimbabwe (CIJZ), Zimbabwe Coalition on Debt and Development (ZIMCODD) and the Anti-Corruption Trust of Southern Africa.[197] The Zimbabwe Law Society also contributes to the anti-corruption debate. There are numerous other CSOs interests and activities touching on the public procurement sphere.

Quantitative analysis

** Recommended quantitative indicator to substantiate assessment of sub-indicator 14(e) Assessment criterion (c):*
- number of domestic civil society organisations (CSOs), including national offices of international CSOs) actively providing oversight and social control in public procurement.

As noted above and elsewhere in this assessment, there is active civil society engagement in Zimbabwe, subject to some constraints. The anonymous MAPS CSO Survey was completed by 10 respondents and the MAPS Assessment team engaged directly with a similar number of representative organisations. Thus, the number of CSOs with an active interest and role in oversight of public procurement is a minimum of 10. The MAPS Assessment team cannot provide a definitive fixed number in response to the data required under this quantitative indicator as there may be more CSOs with specific areas of interest and not captured in this process. *See recommendation at 11(a)(a) on measures to identify more CSOs with interest in public procurement.*
Source: Survey/interviews.

[197] U4 Helpdesk Answer 2023:27, Zimbabwe: Corruption and anti-corruption. Tracking Developments and Progress. Anti-corruption Resource Centre & TI, 18 September 2023.
https://www.u4.no/publications/corruption-and-anti-corruption-efforts-in-zimbabwe

Gap analysis
Recommendations
Assessment criterion 14(e)(d): Suppliers and business associations actively support integrity and ethical behaviour in public procurement, e.g. through internal compliance measures.*
Conclusion: Medium risk gap
Qualitative analysis The National Code on Corporate Governance (ZIMCODE) (first implemented in 2015) applies to all business entities regardless of their manner and form of their incorporation or establishment and whether the business entity is public or private sector or it is non-profit making. There is a strong emphasis in the code on ethical governance, ethical leadership and sustainable ethical practices as well as compliance with professional ethical standards. Compliance with the code is not mandatory. Business, professional and training organisations run events, courses and professional training covering governance, ethics and anti-corruption issues: for example, Zimbabwe National Chamber of Commerce "Industry and Commerce Anti-Corruption Strategies, [198] Chartered Governance and Accountancy Institute in Zimbabwe Diploma in Governance, Risk and Compliance. Institute of Corporate Governance Zimbabwe. Comprehensive data on internal compliance measures is not available.
Quantitative analysis ** Recommended quantitative indicator to substantiate assessment of sub-indicator 14(e) Assessment criterion (d):* *- number of suppliers that have internal compliance measures in place (in %).* *Source: Supplier database.* **Data not available** – data on supplier's internal compliance measures is not currently collected by PRAZ as part of the supplier registration process.
Gap analysis Business, professional and training organisations run events, courses and professional training covering governance, ethics and anti-corruption issues but the MAPS Assessment team was unable to find robust evidence of internal compliance measures consistently applied across all of the supplier community addressed at supporting integrity and ethical behaviour in public procurement.
Recommendations Provide support for and encourage supply side measures to increase focus on integrity in public procurement for example by regular and active participation in business led education and training events in a joined-up manner, involving both procurement and anti-corruption focused stakeholder institutions.
Sub-indicator 14(f) **Secure mechanism for reporting prohibited practices or unethical behaviour**
Assessment criterion 14(f)(a): There are secure, accessible and confidential channels for reporting cases of fraud, corruption or other prohibited practices or unethical behaviour.

[198] https://www.zncc.co.zw/index.php/news/36-industry-and-commerce-anti-corruption-strategies.html

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Conclusion: High risk gap + red flag

Qualitative analysis

ZACC has an active social media presence and offers and publicises a number of channels for reporting suspected cases of fraud and corruption with dedicated toll-free lines and social media pages (see example below) and other reporting channels including toll free hotlines and WhatsApp numbers are available including the Zimbabwe Republic Police, National Prosecuting Authority and Zimbabwe Revenue Authority. During the mandate of NACS1 there have been concerted efforts to improve public awareness and confidence in reporting of unethical practices and there has been an increase in reporting. However, the MAPS Assessment Team observes, a lack of public trust in the integrity of these reporting channels, particularly in the light of the lack of effective whistle-blower and witness protection. (see 14(f)(b)).

ZACC's website[199] is non-functioning, thus information/data on ZACC, its function, activities, Annual Reports and channels for reporting cases is not available through this medium.

There are other channels available to report corruption related concerns including: Zimbabwe Republic Police: boxes and hotlines for anonymous reporting, National Prosecuting Authority of Zimbabwe Inspectorate: phone numbers and a WhatsApp number are available from their website;[200] and ZIMRA's toll free hotline and WhatsApp line.

One of NACS1 goals was to improve public awareness and participation by educating the public on the detrimental impacts of corruption and encouraging them to participate in the reporting of unethical practices. The NACS1 Evaluation Report[201] notes various awareness campaigns to inform the public of various channels, methods, platforms and mechanisms for anonymous reporting. Transparency International Zimbabwe (TIZ), in its 2024 Seminar Paper[202] reflecting on NACS1 and proposing improvements for NACS2 notes that there was an increase in the number of reported cases through platforms such as ZACC's anti-corruption hotline and digital platforms.

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[199] https://zacc.co.zw/ accessed on several occasions, last accessed 02 January 2026.

[200] https://www.npa.gov.zw/?page_id=976, accessed 02 January 2026.

[201] Evaluation Report of the Zimbabwe National Anti-Corruption Strategy (2020-2024) prepared for ZACC, November 2024.

[202] Seminar Paper No.2/2024 Reflections on the National Anticorruption Strategy (NACS-1 2020-2024) and Proposed Improvements for the Successor Strategy. https://www.tizim.org/sdm_downloads/seminar-paper-2-2024-reflections-on-the-national-anticorruption-strategy-nacs-1-2020-2024-and-proposed-improvements-for-the-successor-strategy/

However, public trust in the confidentiality and security of the reporting process is significantly impaired by the current lack of robust whistleblower and witness protection legislation and supporting mechanisms. (see analysis at 14(f)(b)). Feedback from MAPS Assessment Team's engagement with the private sector and civil society also flagged a lack of confidence in the integrity of reporting channels.

Gap analysis

Reporting channels are provided but the lack of effective legislative whistleblower and witness protections and related weaknesses in the supporting mechanisms for a whistleblower framework (see 14(f)(b) & (c)) mean that there is a strong perception that the channels are not necessarily secure and confidential. This will significantly undermine general confidence in the anti-corruption framework.

► This Gap is assigned a Red flag because coordinated actions by multiple institutions, including Parliament, ZACC, Zimbabwe Republic Police and NPA as well as PRAZ, will be required to ensure secure, accessible and confidential reporting channels underpinned by an effective legal and regulatory framework providing necessary protections for all whistleblowers and witnesses. These changes demand actions at national level to be aligned with NACS2 led by ZACC, and cannot be resolved solely through actions in the procurement sphere.

Recommendations

Combined recommendations for 14(f)(a), (b) & (c).

Continue to prioritise adoption and full implementation of the Whistleblowers and Witness Protection Bill including the establishment of a Witness Protection Unit and Appeal Tribunal. Supporting measures will also need to be put into place including an effective system to follow up on reports of fraud, corruption and other prohibited practices. Pro-active coordination amongst institutions to facilitate implementation will be required as will sufficient resourcing of the institutional anti-corruption framework (see 14(d)(a)).

Assessment criterion 14(f)(b):

There are legal provisions to protect whistle-blowers, and these are considered effective.

Conclusion: High risk gap + red flag

Qualitative analysis

There is no comprehensive stand-alone legislation currently in force[203] to protect whistle-blowers (reporting persons) and the current fragmented provisions are inadequate. Poor protection for whistle-blowers and victims of corruption is a significant disincentive to active citizen participation in anti-corruption efforts. At the end of November 2025, Cabinet considered and approved the long-awaited Whistleblowers and Witness Protection Bill setting out a framework for reporting by and protection of whistleblowers and protection of witnesses including the establishment of a Witness Protection Unit and an Appeal Tribunal under the NPA.

The protection of reporting persons is currently predominantly provided in the Prevention of Corruption Act S.14(2) which criminalises the victimisation of persons who want to report corruption. Provisions in the Criminal Procedure and Evidence Act (Ch.9:07) are sometimes relied upon (S.319B protection of vulnerable witnesses) but are available only to state witnesses. These fragmented provisions do not provide adequate protection to whistleblowers.[204] The Cyber and Data Protection Act, 2021 [Ch.12:07] S.31 Whistleblower, provides that the Postal and Telecommunications Regulatory Authority (designated as the Data Protection Authority) shall establish the rules giving the authorisation for and governing the whistleblowing system and sets out underpinning principles for and coverage of those rules.

[203] On 31 December 2025.

[204] Transparency International Zimbabwe, Seminar Paper No.2 The Quest for Whistleblower protection in Zimbabwe: Issues for Consideration, April 2022.
https://www.tizim.org/wp-content/uploads/2021/11/DIGITAL-Whistleblower-Protection-Seminar-Paper.pdf

The National Anti-Corruption Strategy (2020-2024) (NACS1) Strategic Objective 4 is to "ensure protection of whistleblowers and victims of corruption, therefore encouraging active participation in anti-corruption efforts by members of the public". Actions to be taken in support of this objective include developing legislation of protection of whistleblowers and witnesses.
The Whistleblower and Witness Protection Bill was considered and approved by Cabinet at the end of November 2025. The Bill will now proceed through the parliamentary processes. Enactment of this law is prioritised under NDS2.

Gap analysis
The limited fragmented provisions to protect whistle blowers under current legislation are not effective.
See also, 14(f)(a) & (c).
► This Gap is assigned a Red flag because coordinated actions by multiple institutions, including Parliament, ZACC, Zimbabwe Republic Police and NPA as well as PRAZ, will be required to ensure secure, accessible and confidential reporting channels underpinned by an effective legal and regulatory framework providing necessary protections for all whistleblowers and witnesses These changes demand actions at national level , to be aligned with NACS2 led by ZACC, and cannot be resolved solely through actions in the procurement sphere.

Recommendations
See combined recommendations at 14(f)(a).

Assessment criterion 14(f)(c):
There is a functioning system that serves to follow up on reports of fraud, corruption or other prohibited practices or unethical behaviour.

Conclusion: High risk gap + red flag

Qualitative analysis
As noted above at 14(f)(b) there is no dedicated legislation to protect whistle-blowers or witnesses in corruption cases. The institutional framework to protect whistle-blowers is similarly lacking. TIZ has reported[205] that weak anticorruption institutions, lack of coordination amongst institutions and poor implementation of existing anticorruption legal instruments are contributory factors in Zimbabwe's poor performance in the TI Corruption Perceptions Index.

Gap analysis
The framework to support a well-functioning system to follow up on whistle-blower reports is currently lacking.
See also, 14(f)(a) & (b).
► This Gap is assigned a Red flag because coordinated actions by multiple institutions, including Parliament, ZACC, Zimbabwe Republic Police and NPA as well as PRAZ, will be required to ensure secure, accessible and confidential reporting channels underpinned by an effective legal and regulatory framework providing necessary protections for all whistleblowers and witnesses These changes demand actions at national level , to be aligned with NACS2 led by ZACC, and cannot be resolved solely through actions in the procurement sphere.

Recommendations
See combined recommendations at 14(f)(a).

[205] Reflections on the National Anti-Corruption Strategy (NACS-1 2020-2024) and proposed improvements for the successor strategy, TIZ seminar paper no.2 2024.
https://www.tizim.org/sdm_downloads/seminar-paper-2-2024-reflections-on-the-national-anticorruption-strategy-nacs-1-2020-2024-and-proposed-improvements-for-the-successor-strategy/

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Sub-indicator 14(g) **Codes of conduct/codes of ethics** **and financial disclosure rules**
Assessment criterion 14(g)(a): There is a code of conduct or ethics for government officials, with particular provisions for those involved in public financial management, including procurement.*
Conclusion: No gap
Qualitative analysis There is a Code of Conduct for Procurement Officers set out in the First Schedule to the PPDPA Regs which applies to all procurement officers in all types of PEs who are involved directly or indirectly in public procurement processes. All government officials who are involved in public finance management (including procurement officers) are subject to codes of ethics of their respective professional organisations as well as being required to comply with the general code of conduct for civil servants and to sign the Integrity Pledge. Employees of Procuring Entities which are SOEs and parastatals are subject to ethical requirements of the Public Entities Corporate Governance Act including compliance with a code of ethics. **PPDPA Regs., First Schedule, Code of Conduct for Procurement Officers** contains a code of conduct regulating the behaviour and actions of procurement officers, as well as setting out the values and guidelines during and after their employment in procurement activities. It applies to all procurement officers who are involved directly or indirectly in public procurement processes. PPDPA Regs. R.2 defines “procurement officer: as “an officer, employee or agent of a procuring entity who is responsible for any aspect of the entity’s procurement, including the implementation of procurement contracts.” PPDPA Regs. R.41 requires procurement officers to carry out procurement proceedings in accordance with the PPDPAA and the Code of Conduct for Procurement Officers. PPDPA Regs. R.41 requires that before engaging in any procurement proceedings, every procurement officer shall sign a declaration agreeing to abide by the standards of conduct prescribed by the PPDPAA and the Code of Conduct for Procurement Officers. Failure to comply with the Code of Conduct for Procurement Officers may lead to action under disciplinary rules. PPDPA Regs. R.41(2) requires the Code of Conduct for Procurement Officers to be published on PRAZ’s website, but it is not currently published in that location.[206] **General code of conduct for government officials involved in public financial management:** there is no general code of conduct specifically for government officials involved in public financial management.[207] PFM professionals are, however, subject to the ethical codes of their respective professional bodies such as the Public Accountants and Auditors Board and Institute of Internal Auditors. The CIPS Code of Ethics is also applicable to CIPS qualified staff. **Integrity Pledge:** All civil servants are also required to sign the Integrity Pledge. The Integrity Pledge is issued by ZACC and sets out a personal commitment by the signatory to ethical practices and good governance as a public official.[208] According to the NACS1 Evaluation Report (November 2024) 10,917 integrity pledges have been signed. **Integrity Committees:** Integrity Committees consisting of staff members of a procuring entities are charged with overseeing the implementation of and compliance with integrity systems and plans and compiling annual ethics and transparency reports. It is also intended that integrity committee members will assist colleagues in maintaining their personal integrity. According to the NACS1 (November 2024), 169 integrity committees have been established and trained.

[206] PRAZ website accessed 08 February 2026.
[207] Codes of conduct for PFM officials - information provided by MOFEDIP, 05 November 2025.
[208] Copy of standard form Integrity Pledge provided to MAPS Assessment team by Public Service Commission, November 2025.

Public Entities Corporate Governance Act: PART VI, S.26 to 32, require public entities to honour the Good Corporate Governance Code (i.e. the National Code on Corporate Governance which applies to both private and public sector corporate bodies) and prepare board charters and codes of ethics. PECG Act S.27 sets out the principles and contents of board charters and codes of ethics. PECG Act S.30 requires a copy of an entity's board charter and code of ethics to be available in electronic form on the entity's website, in addition to being available for inspection at the entity's office. There are provisions requiring boards to monitor compliance by employees with the code of ethics. The Corporate Governance Unit in the Office of the President and Cabinet does not currently hold data on compliance of public entities with requirements for codes of ethics. and compliance by employees with the code of ethics.[209]
Quantitative analysis ** Recommended quantitative indicator to substantiate assessment of sub-indicator 14(g) Assessment criterion (a):* *- share of procurement entities that have a mandatory code of conduct or ethics, with particular provisions for those involved in public financial management, including procurement (in % of total number of procuring entities).* All procuring entities have Procurement Management Units and all procurement staff within those units are required to comply with the Code of Conduct for Procurement Officers. Thus, by operation of law, compliance is 100% with respect to a mandatory code of conduct for procurement staff. *Source: PRAZ.*
Gap analysis
Recommendations
Assessment criterion 14(g)(b): The code of conduct defines accountability for decision making, and subjects decision makers to specific financial disclosure requirements.*
Conclusion: No gap
Qualitative analysis **Accountability for decision making:** Code of Conduct for Procurement Officers, S.5 Accountability and transparency, provides that procurement officers are accountable for the decisions they make and the actions they take and they must be prepared to justify their decisions and actions. **Financial disclosure:** Code of Conduct for Procurement Officers, Section 6 Integrity, requires procurement officers to declare "any personal interest that might affect or be seen by others to affect, their impartiality in decision making." PPDPA Regs. R.41 requires that before engaging in any procurement proceedings, every procurement officer shall sign a declaration agreeing to abide by the standards of conduct prescribed by the PPDPAA and the Code of Conduct for Procurement Officers.
Quantitative analysis ** Recommended quantitative indicator to substantiate assessment of sub-indicator 14(g) Assessment criterion (b):* *- officials involved in public procurement that have filed financial disclosure forms (in % of total required by law).* Data not available: there is currently no single central repository of financial disclosure forms for all officials involved in public procurement. Comprehensive data is thus not available. *Source: Normative/regulatory function.*

[209] CGU & Codes of ethics - information provided by CGU in meeting with MAPS Assessment team, November 2025

Gap analysis
Recommendations
Assessment criterion 14(g)(c): The code of conduct is mandatory, and the consequences of any failure to comply are administrative or criminal.
Conclusion: No gap
Qualitative analysis
Gap analysis Compliance with the Code of Conduct for Procurement Officers is mandatory. Failure to comply with the Code of Conduct for Procurement Officers may lead to action under disciplinary rules with administrative consequences including reprimands, suspension or withdrawal of licence and a fine. PPDPA Regs. R.41 requires procurement officers to carry out procurement proceedings in accordance with the PPDPAA and the Code of Conduct for Procurement Officers. Code of Conduct for Procurement Officer, S.2(1) “applies to all procurement officers who are involved directly or indirectly in public procurement processes.” S.2(3) provides that “the conduct of procurement officers will be judged against this Code, and any breach may lead to action under the disciplinary rules set out in the Fourth Schedule.” PPDPA Regs. Fourth Schedule Discipline of Procurement Officers sets out the disciplinary process and the sanctions that may be imposed which include reprimands, temporary suspension of licence, permanent withdrawal of licence and a fine.
Recommendations
Assessment criterion 14(g)(d): Regular training programmes are offered to ensure sustained awareness and implementation of measures contains in the code of conduct.
Conclusion: Medium risk gap
Qualitative analysis See analysis at 14(d)(e) on special integrity training programmes. In direct discussions, MAPS Assessment Team asked representatives of PEs (MDAs, Local Authorities and parastatals/SOEs) whether they receive regular refresher training on the Code of Conduct. The PEs represented said that they have not participated in regular refresher training on the Code of Conduct.
Gap analysis Regular refresher training programmes on the Code of Conduct for Procurement Officers are not offered, potential reducing the effectiveness of this Code to sustain awareness of the provisions of the code and to maintain the highest ethical practices.
Recommendations Provide regular refresher training programmes to be undertaken by all procurement officers to ensure ongoing and sustained awareness of the Code of Conduct for Procurement Officers. This could, for example, be in the form of an online interactive training package to be completed on a personal basis by each procurement officer within a defined period.

Pillar IV. Accountability, Integrity and Transparency of the Public Procurement System

Assessment criterion 14(g)(e): Conflict of interest statements, financial disclosure forms and information on beneficial ownership are systematically filed, accessible and utilised by decision makers to prevent corruption risks throughout the public procurement cycle.
Conclusion: High risk gap

Qualitative analysis

Procurement staff are required to make declarations of potential conflicts of interest and evaluation committee members are required to sign disclosure of conflict-of-interest statements before performing evaluations but, as shown by the analysis of sample procurement files (*see 9(c)(g))* record keeping is poor and procurement files often lack relevant documents. There are provisions requiring all board members and senior staff of public entities subject to the PECG Act to make regular disclosure of assets to be filed with the CGU, but CGU's records are currently manual and thus cannot be regarded as easily accessible. There are no equivalent provisions applying to board members and senior staff in the Public Service, although amendments to that effect are proposed. Companies legislation requires companies to maintain and file beneficial ownership information, but there is no publicly accessible beneficial ownership register. Requests for information on beneficial ownership is not part of the Standard Bidding Document and thus not a standard part of the bidding process.

Conflict of interest declarations/statement: The Training Needs Analysis explored with participants the oversight and controls used in public procurement processes, including mechanisms to identify and manage potential conflicts of interest. The results demonstrated a high level of understanding among PMU staff of the requirements to declare any potential conflict of interest and to recuse themselves from the procurement process in the event of a potential conflict of interest. Respondents also confirmed that procurement evaluation committee members do sign disclosure of conflict-of-interest statements before performing evaluations. PRAZ has not issued template forms for conflict-of-interest declarations/statements.

Financial disclosure/declarations of assets

There are provisions requiring all board members and senior staff of public entities subject to the PECG Act to declare assets. There are no equivalent provisions applying to board members and senior staff in the Public Service, although amendments to that effect are proposed. NDS2 references the introduction of mandatory declaration of assets (paragraph 1777.)

The Constitution of Zimbabwe s.198 requires, in summary, the enactment of national legislation (Act of Parliament) requiring public officers to make regular disclosures of their assets and establishing codes of conduct to be observed by public officers. It also requires measure to be in place specifying standards of good corporate governance by government-controlled entities and other commercial entities owned or wholly controlled by the State as well as providing for disciplining of persons who contravene these provisions or a code of conduct or standard implemented pursuant to these provisions. Prevention of Corruption Act provides that the Minister may make regulations to provide for disclosure by public officers and other agents of interests in contracts or proposed contracts.

PECG Act S.37 Declaration of assets by board members and senior staff of public entities, requires board members and senior staff to provide to the Office of the President and Cabinet on an annual basis, written a declaration of all immovable property, movable property exceeding prescribed values, any business in which they have an interest or play a part in running. There are similar provision applying to every associate of the board member or senior staff member. The Corporate Governance Unit in the Office of the President and Cabinet records declarations of assets manually and thus these records cannot be regarded as easily accessible.[210] As previously noted, the CGU is currently receiving support from the AfDB to digitise its processes.

Public Service (Amendment) Bill, 2025 (HB 8:2025) proposes amendments to the Public Service Act [Ch.16:04] including a new section 23A "Disclosure of Assets" which will require members of a board of a Public Service and

[210] CGU and Declarations of Assets information provided by CGU in meeting with MAPS Assessment team, November 2025

senior staff members of the Public Service to submit a declaration of assets to the Corporate Governance Unit upon appointment or reappointment and annually thereafter. This is in line with the stated intention in NDS2 to introduce this amendment. The content of the declaration of assets is listed in the First Schedule. However, in December 2025 the Parliamentary Legal Committee issued an adverse report on the Bill, citing several constitutional inconsistencies meaning that further consideration by Parliament is deferred.[211]

Supplier Information on beneficial ownership:
Companies legislation requires companies to maintain and file beneficial ownership information, but there is no publicly accessible only beneficial ownership register. Requests for information on beneficial ownership is not part of the Standard Bidding Document and thus not a standard part of the bidding process.

Companies and Other Business Entities Act[212] [Ch.24:31] S.72 Obligations to maintain and file beneficial ownership information, requires every company to maintain an accurate and up-to-date register of beneficial owners. Companies are required to file accurate and up-to-date beneficial ownership information with the Registrar of Companies which shall be public information available for inspection. S.73 Prohibition of concealment of beneficial ownership, confirms that any company or private business cooperation that fails to keep the register of names and particulars of a beneficial owner as required shall be liable to a civil penalty order. However, S.73(10) provides, in the context of nominee provisions, that "[t]he name and relevant particulars of the beneficial owners referred to in subsection (9) shall not be disclosed except with the consent of the nominee or by virtue of an order of a court of competent jurisdiction." This provision appears to potentially reduce the level of transparency. There is currently no publicly accessible online beneficial ownership register available on the Companies Registry website.[213] [214]

Anti-money laundering, proceeds of crime and asset forfeiture[215]
Financial Intelligence Unit: established under the Money Laundering and Proceeds of Crime Act (Ch.9:24) which investigates suspicious financial transactions, shares reports with law enforcement agencies and promotes anti-money laundering practices in line with international practices.
Asset Management Unit (AMU): established under the Money Laundering and Proceeds of Crime Act (Ch.9:24 to manage and safeguard property and assets seized from criminals.
Asset Forfeiture Unit (AFU): operating as a unit of the NPA working with other national/international agencies to trace, identify, recover, seize or confiscate proceeds of crime

Conflicts of Interest: Training Needs Analysis Descriptive Statistics

3.1.2 Public Procurement Process Oversight and Controls

[211] https://zimbabwenow.co.zw/articles/19621/parliamentary-committee-declares-public-service-amendment-bill-unconstitutional
[212] Companies and Other Business Entities Act, 2019 [Ch.24:31] https://zimlii.org/akn/zw/act/2019/4/eng@2019-11-15
[213] https://www.zimbabwecompaniesregistry.org/ accessed 02 January 2026.
[214] https://www.openownership.org/en/map/country/zimbabwe/
[215] A Compendium of Anti-Corruption Sector Institutions in Zimbabwe, TIZ, 2024. https://www.tizim.org/wp-content/uploads/2024/12/TIZ-A-COMPENDIUM-OF-ANTI-CORRUPTION-SECTOR-INSTITUTIONS-IN-ZIMBABWE.pdf

All employees involved in the procurement process are required to declare any potential conflict of interest.	165	2.00	5.00	4.297	.734
All employees involved in the procurement process who declare any potential conflict of interest are required to recuse themselves from the procurement process.	165	1.00	5.00	4.254	.831

3.11 Public Procurement Processes: Goods, Services and Works

The procurement evaluation committee members sign a disclosure of conflict-of-interest status before performing evaluation.	165	1.00	5.00	4.097	1.113

Gap analysis

The MAPS Assessment team was unable to find evidence that conflict of interest statements, financial disclosure forms and information on beneficial ownership (where required) are systematically filed as a matter of course by all procuring entities in procurement files (see analysis at indicator 9 flagging poor record keeping). There is currently no central database to collate this information and data to facilitate identification and prevention of corruption risks in procurement.

► This Gap is assigned a Red flag because in order to achieve meaningful resolution it will require measures to resolve this gap which lie outside the control of PRAZ, in particular the digitalisation of records by the CGU in respect of financial reporting/asset declaration by officers of parastatals and SOEs and the online publication by the Companies Registry of a comprehensive register of beneficial ownership

Recommendations

Conflict of interest statements, financial disclosure forms and declarations of assets should ideally be standardised and all filed and accessible through a single portal to facilitate use by decision makers to identify and prevent corruption risks throughout the procurement cycle. However, a meaningful database of information is dependent upon compliance at all levels with requirements to complete and file statements, forms and information and for that information to be stored and available in a machine-readable format. Implementation of ongoing projects, such as digitalisation of CGU records, to develop databases of information should be prioritised in a manner which ensures interoperability so that data can be consolidated and shared.

Appropriate measures should be considered to ensure that, at PE level, conflicts of interest statements and financial disclosure forms are completed and filed as a matter of course and compliance with these requirements is audited and enforced. Consideration should also be given as to the format in which those forms are stored and accessed.

Provisions requesting information on beneficial ownership should be included in relevant standard bidding documents. There should be a publicly accessible online register of beneficial ownership with full disclosure of all beneficial owners.

Suggestions for improvement

In order to enhance consistency of practice on declarations of interest by procurement professionals and evaluation committee members, PRAZ should consider issuing standard templates for declarations of interest to be used by all PEs and compatible for use with the eGP system.