



global witness

HOSTILE TAKEOVER

The corporate empire of Cambodia's ruling family



JULY 2016

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EXECUTIVE SUMMARY¹

“I think that within two years my assets will decrease, there won't be a gain. And besides my salary I don't have any other income. But I think my children will support me, they won't let me starve.”²

– Hun Sen, April 2011

Cambodian prime minister Hun Sen held his asset declaration form up to the flashing cameras as he addressed a room full of journalists. It was April 2011 and for the first time ever, Hun Sen was publicly declaring his assets to Cambodia's newly installed anti-corruption unit.³ Cambodia's fledgling anti-corruption law included an obligation on more than 25,000 Cambodian officials to declare their assets every two years. Those who failed to do so faced a maximum fine of US\$500 and up to a year spent in prison.⁴

This anti-corruption drive was long overdue. For many years the country has languished at the bottom of Transparency International's *Corruption Perceptions Index*. Most recently, in 2015, it ranked 150th out of 168 countries - the lowest score in Southeast Asia.⁵

But the figures on Hun Sen's inaugural declaration were puzzling. The prime minister's salary, which he claimed as his sole source of income, was US\$1,150 per month, amounting to US\$13,800 a year.⁶ Puzzling because the Hun family is renowned as one of the richest, if not the richest, and most powerful families in Cambodia, with a combined wealth estimated by experts to total between US\$500 million and US\$1 billion.⁷

Hostile Takeover helps solve that mystery. It is the first ever exposé to reveal how, behind the scenes of Hun Sen's dictatorial rein, his family is amassing vast personal fortunes, tracing the contours of a huge network of secret deal-making, corruption and cronyism which is helping secure the prime minister's political fortress.

Hun Sen is the world's sixth longest-serving premier having been in power for 30 years, years that have been characterised by electoral fraud and the brutal suppression of political opposition, including through murder, torture and arbitrary imprisonment.⁸ This report provides the evidence base to prove what most Cambodians suspect – that Hun Sen has abused his



Cambodian journalists have been ordered to use Hun Sen's full title in their coverage, "Lord Prime Minister and Supreme Military Commander".

position as prime minister to allow his relatives control of, or major stakes in, most of Cambodia's key industries.

Our investigators spent months mining data on company ownership in Cambodia – information that the government has recently restricted access to - that shows who owns or controls private companies registered there. We then mapped that data onto the Hun family tree, to find that the prime minister's immediate family have registered business holdings that link it to companies with a total listed share capital of more than US\$200 million, including links to international brands such as Apple, Nokia, Visa, Unilever, Procter & Gamble and Honda.⁹ Their business holdings span many of Cambodia's most profitable sectors, including those known to be riddled with corruption such as mining, gambling and real estate.

This is undoubtedly just a fraction of the true value of the family's holdings – the government data we mined is limited in scope, and the Hun family is said to obscure their links to companies by listing the names of friends and associates as nominee owners, or hiding their identity behind shell companies.

“[In 2015, Hun Sen] used his control of Cambodia's security forces, courts, and civil service to force the opposition leader into exile, beat up opposition politicians, jail critics, pass draconian laws, and increase the ruling party's stranglehold on the country's institutions.”¹⁰ – Human Rights Watch, January 2016

¹ References for the points made in this section can be found in the main body of the report unless otherwise indicated.

The impact of the Hun family's thumbprint on Cambodia's economy is more than just wealth and privilege. It is resulting in hegemonic control that has formed a stranglehold over the democratic space and corrupted the country's legal system which remains firmly under the control of Hun Sen. As a result, companies linked to the Hun family appear not to have been troubled by anti-corruption laws preventing preferential allocation of lucrative public contracts and concession licences. These are not victimless crimes – some of their companies' operations have driven devastating impacts for Cambodian citizens and the environment, including land grabs that have caused mass displacements and destitution among Cambodia's rural poor. Unrelated to their companies, individuals within the family have also allegedly committed serious criminal offenses without facing prosecution. Over the years, family members have been implicated in a US\$1 billion heroin-smuggling operation, shoot-outs and a fatal hit-and-run.

The prime minister's relatives have also been instrumental in helping secure his control through means other than their domination of the private sector. They hold key posts across the state apparatus, including in politics, the military, police, media, and charities – sectors that prop up Hun Sen's Cambodian People's Party through propaganda, political donations or brute force. Hun Manet, for example, the prime minister's eldest son and heir apparent, holds four notable positions – he is deputy commander of the prime minister's bodyguard unit, deputy chairman of the Royal Cambodian Armed Forces Joint Staff, deputy commander of the army and commander of Cambodia's counter-terrorism special forces. Manet's middle brother Manith is a Lieutenant General in the military and director of the Defence Ministry's military intelligence unit. Hun Sen's two youngest children, Many and Maly, are each married to the offspring of one of the country's nine deputy prime ministers – just two examples of a plethora of intermarriages between the prime minister's immediate family and those of powerful elites. Hun Mana, Hun Sen's eldest daughter and the most prominent business tycoon in the family, is one of only two media moguls in Cambodia to own outlets which broadcast across radio, TV and newspapers.

The results of the stranglehold that the Hun family and other elites have over almost every aspect of society are plain to see in today's Cambodia. Despite overall economic growth, six million Cambodians, 40% of the population, still live below or close to the poverty line.¹¹ Inequality is growing with the lifestyle gap between rich urban elites and the 80 percent of Cambodian citizens still living in rural areas becoming ever more stark.¹²

“Oligarchs are linked to ministers, police chiefs to party power-brokers. Money circulates within a nexus of political and economic connections in which allies are not just friends – but family too.”¹³

– Sebastian Strangio, *Hun Sen's Cambodia*, 2014

This power base is also dependent on influxes of capital from abroad. Our investigations revealed a plethora of links between companies owned or controlled by the Hun family and big international brands. These relationships not only raise ethical questions for the brands, they also pose significant risk. Companies and investors entering into any kind of business arrangement with political elites or their family members, in an opaque business environment such as Cambodia's, risk breaking national and international anti-corruption laws, facing financial penalties, and ultimately tarnishing their reputations.

Whether these links are via formal partnerships, franchising, supply chains, distribution deals or even loose client relationships, international companies should not be doing business with individuals or companies with a history of corruption allegations and human rights abuses. Those that do so have either failed to carry out the appropriate checks and balances or are aware of the connections but have chosen not to care.

KEY FINDINGS

- Hun Sen's immediate family¹⁴ has registered interests in 114 private domestic companies with listed capital of more than US\$200 million. This figure excludes 16 of the 114 companies (14%) where data on company capital was unavailable.¹⁵ A complete list of holdings can be found in Annex 1 on page 33.
- 103 of these companies (90%) count the family member as chairperson, director or as having a shareholding of more than 25%, meaning that they exercise total or substantial control.¹⁶ For a breakdown of this figure go to Annexes 1 and 4.
- Of the 44 companies for which we were able to obtain shareholder information, all shareholdings held by family members grant them significant ownership, with a minimum stake of 5%.¹⁷ For a breakdown of this figure go to Annex 1.
- 30 companies (26%) with links to the family are listed as a 'Single Member Private Limited Company' meaning that the entire share capital issued is held or owned by one single person. Hun family members are listed as company directors or chairs in all 30 of these cases, therefore it is highly likely that a member of the family is the sole owner of the majority, if not all, of these companies.¹⁸ For a breakdown of this figure see Annex 4.
- Companies associated to the Hun family span the majority of Cambodia's most lucrative business sectors, including trade, finance, energy and tourism. They also operate within a number of sectors notorious for corruption including gambling, construction, agriculture and mining. For a full sectorial breakdown see Figure 1 page 11.
- Companies linked to members of the Hun family have business connections to major global brands including Visa, Unilever, Procter & Gamble, Honda, Heineken and electronics giants Apple, Canon and Nokia. For more details, see page 18.

This is likely just the tip of the iceberg. Our investigation relied almost exclusively on official government data from Cambodia's Ministry of Commerce company registry. This lists company chairs but does not systematically provide complete lists of directors or shareholders. More importantly, the findings only reveal those business holdings that have been officially declared. Family members, including Hun Sen, have long been thought to conceal their interests in private companies by using proxies, in other words getting non-family members to register business holdings in their name while the Hun family remains the ultimate beneficiary.

In January 2016 Global Witness wrote to 25 members of the Hun family, including the prime minister himself, asking for their response to the allegations made against them in this report. At the time of publishing, only one response had been received from one of Hun Sen's son-in-laws, Sok Puthyuth, which is featured on page 20. Global Witness also wrote to the majority of the Cambodian companies and organisations mentioned and received six responses which have been included throughout the report.



Hun Sen and Bun Rany pose with four of their children and their spouses and Former Thai Prime Minister Thaksin Shinawatra in 2009. © AP/Press Association Images

KEY RECOMMENDATIONS

For the full list of recommendations go to page 31.

Companies and investors should:

- Conduct stringent due diligence to ascertain who is involved in the investment. Where there is the involvement of business or political elites (including all Politically Exposed Persons) with a history of corruption allegations, or their family members, do not proceed with the investment. Where this relates to an existing investment, then exit the business relationship as soon as possible. If evidence of involvement in corruption is uncovered through the due diligence process then companies and investors should self-report the findings to all relevant authorities that have legal jurisdiction.

International governments providing Cambodia with financial aid and other types of assistance:

- Ensure that all donor money to Cambodia is managed transparently, does not end up in the pockets of elites, and is spent in a way which benefits the citizens of Cambodia.
- Warn home country investors about the high-risk of becoming embroiled in corruption when investing in Cambodia. Advise them to conduct stringent due diligence to ensure that they are not entering commercial relationships with business or political elites with a history of corruption allegations or their family members. Advise them that certain sectors, such as natural resource extraction, are particularly high-risk and therefore should be avoided.
- Publicly oppose the ongoing closing down of democratic space including the clampdown on government critics and the introduction of repressive legislation.

The Royal Government of Cambodia should:

- Conduct thorough, independent and transparent investigations into the allegations made in this report and prosecute those individuals and companies found to be breaking Cambodian law. In particular, conduct a thorough and transparent investigation into Prime Minister Hun Sen, and the members of his family named in this report, for the crimes of illicit enrichment and the granting and receiving of unfair advantages over the allocation of state resources.
- Reform the Anti-Corruption Law so that it is fit for purpose. In particular, add requirements for all public officials and their family members to make public declarations concerning their personal assets including business holdings.
- Bring an end to the recent wave of repressive actions including;
 - Stopping the current surge in persecution of government critics
 - Ensuring that repressive laws currently in the pipeline do not pass in their current form and that similarly repressive laws that have passed recently are repealed.

Members of the Hun family, including Prime Minister Hun Sen, should;

- Make full public declarations of their assets including all existing connections to domestic and international companies, whether those connections are formal or informal.

CAMBODIA IS OPEN FOR BUSINESS

It can be tempting to describe Cambodia's fate under prime minister Hun Sen as a descent into chaos. But despite all the violence and abuse, this is not anarchy. It is the systematic capture of an entire state and its resources by a profoundly corrupt regime, which has clamped down on free speech and trampled over those who stand in its way, often literally. *Hostile Takeover* lays bare the economic dimensions of the Hun Sen operation, and shows its stranglehold on almost every sector of Cambodia's political economy.

Formerly a commander in the Khmer Rouge, Hun Sen rose to the premiership in 1985.¹⁹ Cambodians voted him out in the UN-administered elections in 1993, but Hun Sen famously refused to step down.²⁰ Since then, each and every election in Cambodia has been marred by violence or the promise of it.²¹ In 1997, in the run up to the general election, 16 people died and more than 150 were wounded in a grenade attack involving the prime minister's bodyguard unit at a rally led by opposition leader Sam Rainsy. Later that year, in the wake of the bloody July coup in which Hun Sen ousted his co-prime minister, more than 100 people – mainly royalist opposition party members – were summarily executed. To date, none of these crimes have been properly investigated or prosecuted.²²

Cambodia has long posed a dilemma to the international community. The US, for example, happily imports its cheap garments and invests in its economy – which markets itself on its lax approach to regulation – and it is also the country's third biggest aid donor.²³ But Hun Sen's bleak human rights record has sat uncomfortably on Washington's diplomatic conscience, and had always disqualified the premier from an official invitation to the US.



The US and Cambodian military come together for two weeks every year to take part in joint training exercises.

“I think it's quite remarkable that the United States is in fact Cambodia's largest export market, even though we have half the world between our countries. And we will continue to explore ways to deepen our trade and investment relationship, including by helping to tackle corruption and exploring ways to strengthen Cambodia's legal institutions.”²⁴

– US Secretary of State John Kerry speaking to reporters in Phnom Penh in January 2016

The second half of that approach appears to have been forgotten. In early 2016, US President Barack Obama requested Hun Sen's presence at the US-ASEAN summit in California, where talks focused on bolstering Washington's trade links with the Southeast Asian nations in attendance.²⁵ Shortly before, US Secretary of State John Kerry paid a preparatory visit to the prime minister in Phnom Penh.²⁶ Among several requests that Hun Sen tabled were that the US increase imports from Cambodia by eliminating quotas and import tariffs, that US businesses increase investment in Cambodia, and that Washington write-off some of Cambodia's historic debts.²⁷

It appears Hun Sen's bold approach may pay off. Washington is looking to shore up US influence in Southeast Asia as a counterbalance to Chinese dominance in the region, and Cambodia – an old ally of China's and a major destination for Chinese investment – will be one of the most important markets for those efforts.²⁸ As a result, Hun Sen is not being treated as a tyrant who should be held to account for the systematic exploitation of Cambodia's people and environment, but as a strategically important business partner whose corrupt personal interests can align with US foreign policy.

This report shows that this approach is deeply flawed. It undermines all attempts by the US and other governments to push Hun Sen's regime to end their corrupt practices and mass human rights violations. With aid still flowing in and investment deals on the table, there is simply no motivation for the Hun family to stop their plunder. Hearing this message loud and clear, they continue to expand their private sector holdings, enabling them to accumulate the wealth required to maintain their 30 year rule.²⁹

The US and other governments that are key donors and trading partners with Cambodia should be using their leverage to ensure governance reforms that will halt the asset-stripping. They should also be making companies that invest in Cambodia aware of the significant legal, financial and reputational risks of doing business in such a corrupt environment.



Cambodians protest against the NGO law outside the Senate in July 2015. Despite widespread domestic and international opposition the law was passed a month later.

CAMBODIA CORPORATES AND THE POWER OF DATA

The Hun family has well-known links to some industries and companies in Cambodia, but never before has anyone attempted to map out the extent of their control of the country's business sector. Using data taken from the Cambodian Ministry of Commerce's corporate registry, Global Witness investigators were able to establish how the Hun family owns or part-controls companies with a total share capital of more than US\$200 million.³⁰ This is likely just the tip of the iceberg given the layers of fake nominees, shell companies or non-disclosure supposedly used by Cambodia's political elite to obscure their commercial interests.³¹ Among the companies that the Hun family control or part-own are several that have been accused of egregious social and environmental crimes, for example Khun Sea Import Export which has been involved in land grabbing and forced evictions and the Garuda Group which, according to local media, has violently suppressed garment workers' protests.³²

The Ministry of Commerce data that informed the investigation was once in the public domain, but in April 2015 the government restricted access to it.³³ Before this date, it had been possible to conduct anonymous searches on the ministry's online corporate registry. This had enabled investigators and activists to access company ownership information without being identified by the government, which lessened the likelihood of them facing reprisals once they published or acted upon their findings. However, users must now register to obtain a log-in, enabling the government to monitor who's using their database and what they're searching for.³⁴ At a time when the prime minister is recruiting teams of civil servants to trawl the internet for comments deemed critical of government policy - a project which has resulted in arrests, imprisonment and lawsuits - most people are unwilling to take the risk.³⁵

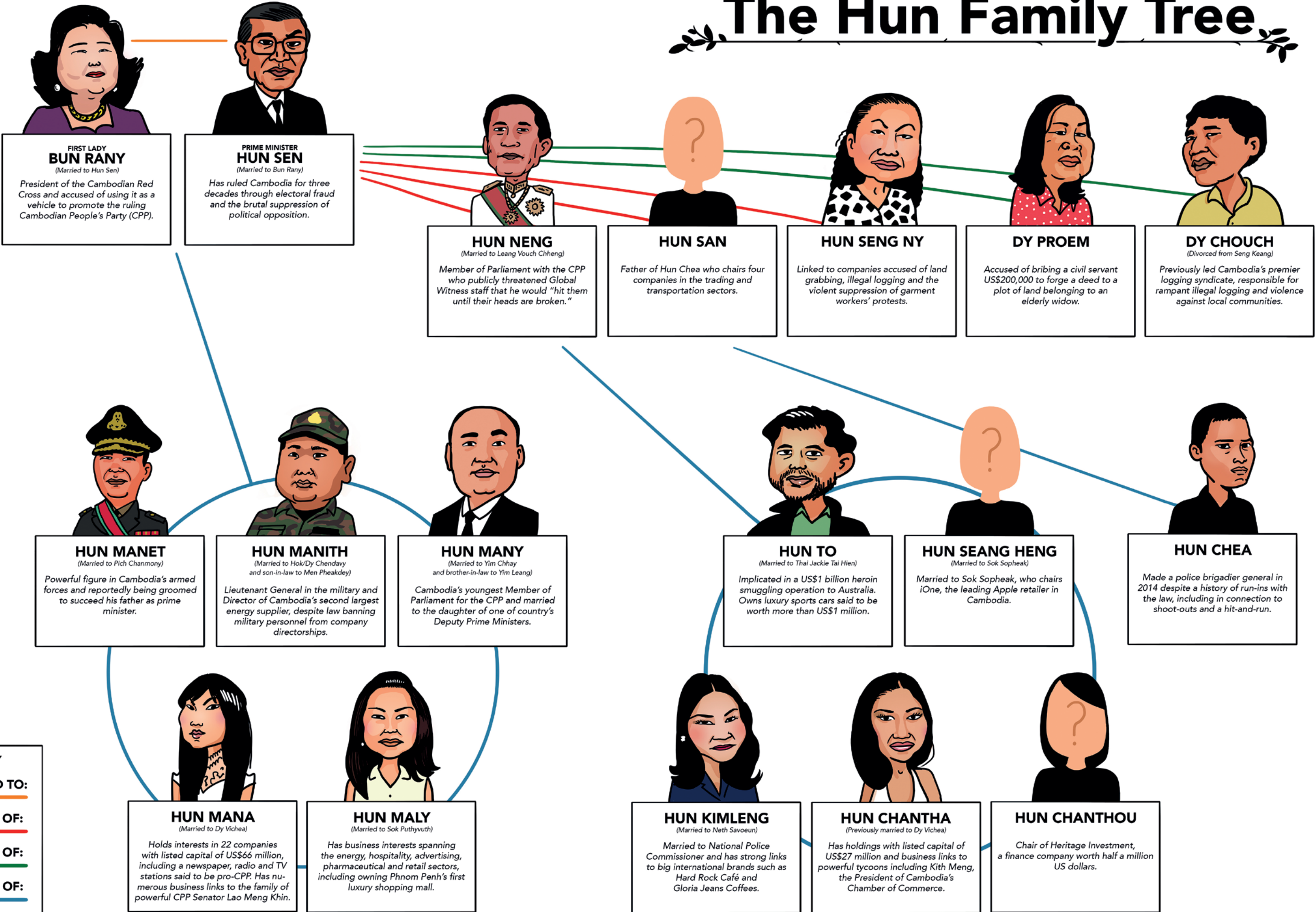
The government's intervention to impede access to company ownership information is part of a far broader assault on transparency and accountability in Cambodia. A recently-passed NGO law allows the government to shut down or ban any organisation that speaks out against its policies.³⁶ The 2015 Law on Telecommunications grants the government virtually unchecked spying powers and criminalises any electronic communication that "may affect public order or national insecurity."³⁷ Online control is further reinforced by the government's "Cyber War Team" which was created in October 2014 to "protect the government's stance and prestige".³⁸

This suffocation of democratic freedoms is making it increasingly hard for Cambodians to monitor and speak out about the corruption at the heart of their political and economic systems. This in turn rewards criminals with impunity, matches power with privilege, and further widens the gap between rich and poor.³⁹ Many critics and political opponents of Hun Sen have had to seek exile overseas.⁴⁰

In an effort to offset this, Global Witness has transformed data scraped from the Ministry of Commerce's site into an online, fully-searchable database hosted on our website. Launched in tandem with this publication, our *Cambodia Corporates* site allows journalists, investigators and NGOs to analyse who owns, controls or has major stakes in companies in Cambodia without fear of censorship, prosecution or worse.⁴¹

We hope that the database will also be used by companies and investors that are considering or already engaged in business with Cambodia. It should be used as a key starting point for due diligence processes - enabling investors to gauge the level of risk by seeing who they are getting into bed with. Without this resource, they will struggle to determine who profits from their investment, leaving them exposed to significant legal and financial risk. More importantly, using the database will help them to identify whether their investment is helping fuel corruption, human rights abuses, social injustice or environmental crime and what damage it could do either to ordinary people in Cambodia or their own reputation.

The Hun Family Tree



KEY

MARRIED TO: (Orange line)

SIBLING OF: (Red line)

COUSIN OF: (Green line)

PARENT OF: (Blue line)

THE HUN FAMILY'S BUSINESS EMPIRE

Since Hun Sen assumed office as co-prime minister in 1993 he has populated strategic posts in the government, the police, military, parliament, courts and charitable sector with relatives and friends to ensure full control of state apparatus.⁴² Over the years these structures of patronage have extended into the private sector, with chairmanships, directorships and majority shareholdings ending up in the hands of family members or cronies.⁴³ This has created a closed circle of immense and ever-growing wealth, bound together by strategic inter-marriages.⁴⁴ However, this is not just about the accumulation of personal wealth or specific links between Hun family members and particular companies – the Hun family's domination of Cambodia's public and private sectors has resulted in Hun Sen have near-total control over the country.

The prime minister's hold over the economy is due in part to the fact that his family's business holdings span such a wide range of economic sectors - 20 in total.⁴⁵

By far the largest number of companies controlled by the family are **trading companies**, which make up around 15% of the total with 17 companies.⁴⁶ This is a sector that is rife with corruption. In 2013 Cambodia's imports and exports were valued at more than US\$18 billion.⁴⁷ That same year, the anti-corruption group Global Financial Integrity estimated that the country lost US\$4 billion in illicit financial flows, US\$3.86 billion of which was as a result of trade mis-invoicing.⁴⁸ A form of money laundering, trade mis-invoicing happens when companies fraudulently manipulate the price, quantity, or quality of a good or service that is being imported or exported on documents submitted to customs.⁴⁹ Global Witness appeared to have uncovered one such scam in 2015, when investigators were able to obtain documents showing logging tycoon and close associate of Hun Sen, Try Pheap, substantially changing the value of timber being exported to Hong Kong apparently to avoid customs duties.⁵⁰

Cambodia's **natural resources** sector is another favourite recourse for the Hun family's investments. We have established Hun family holdings in a number of agricultural companies, most notably in the rubber sector, which is Cambodia's second largest crop after rice.⁵¹ The family also has links to six mining companies that hold licences for largely untapped projects in at least five provinces.⁵² With extraction of Cambodia's oil and minerals set to begin soon, it is a pivotal time for the country's burgeoning mining industry and those involved stand to make huge profits.⁵³ Global Witness exposés over the last 20 years have also revealed the corruption, human rights abuses and environmental destruction at the heart of this sector, showing how the country's ruling elite has been able to plunder the country's natural wealth with total impunity - first forests, then oil, gas and mineral reserves, and most recently land for agribusiness.⁵⁴

Construction and real estate is now big business in Cambodia, with investment in 2015 totaling US\$3.34 billion – a 33% increase from the previous year.⁵⁵ The sector, in which the Hun family has interests in seven companies, is reported to be corrupt with rich elites said to be able to pay off inspectors and therefore ignore regulations.⁵⁶

Cambodia's **media** sector is highly concentrated in the hands of political and business elites, many of whom own private media companies.⁵⁷ The Hun family fully own two media companies – Bayon Media and Kampuchea Thmey – which enables them to broadcast across TV, radio and print.⁵⁸ In 2015, Freedom House categorised Cambodia's press environment as 'Not Free' stating *"most outlets are openly aligned with a political faction, leaving little space for balanced views and journalism conducted in the public interest"*.⁵⁹

Special Economic Zones - Members of the Hun family and their associates also dominate Cambodia's Special Economic Zones (SEZ) – industrial parks largely devoted to manufacturing where factories and workers' accommodation stand side by side.⁶⁰ Business and trade laws differ from the rest of the country, offering companies who invest in SEZs a number of fiscal perks such as concessions on customs duties and VAT.⁶¹

Of the US\$4.5 billion worth of goods exported by Cambodia in 2015, almost a third came from these special zones.⁶² Companies applying to become zone developers, thereby taking on the establishment and management of an SEZ, first need approval from the Council for the Development of Cambodia, which is composed of senior government ministers and chaired by Hun Sen himself.⁶³ The Council reviews investment applications and grants incentives, giving its members enormous power over Cambodia's investment decisions.⁶⁴

Cambodia currently has 34 approved SEZs which, unlike in most other countries, are managed by private companies rather than the government.⁶⁵ Of the 31 SEZs for which information is available, at least 12 have been allocated to business tycoons with close connections to the Hun family or the CPP.⁶⁶ This includes Dy Chendavy (also known as Hok Chendavy), Hun Manith's wife, and her mother, Men Pheakdey, who have the licence to develop the US\$52 million D & M (Bavet) SEZ Co's Special Economic Zone in Svay Rieng Province.⁶⁷ NLC Import Export, chaired by Hun Sen's sister-in-law Leang Vouch Chheng, holds another SEZ in Svay Rieng Province which government data lists as having capital of US\$13 million.⁶⁸

For a full list of the family's business holdings see the infographic on page 16 or Annex 1 on page 33.

Lining the pockets of the Hun Family

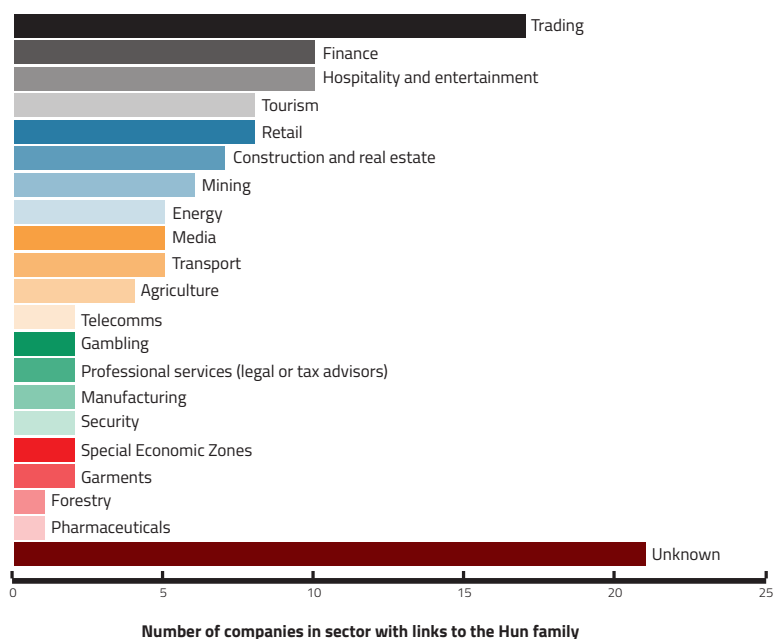
The corporate empire of Prime Minister Hun Sen's family spans the majority of Cambodia's most lucrative business sectors. So much so that residents of Phnom Penh might struggle to avoid lining their pockets multiple times a day...



KEY

- 1.** Hun Sen's youngest daughter chairs TK Avenue, Phnom Penh's first luxury shopping mall.
- 2.** Hun Mana has interests in K Thong Huot Telecom, which claims to have exclusive distribution rights for Nokia phones in Cambodia.
- 3.** Hun Mana chairs NVC Corporation which makes Vital bottled water promoted by the Ministry of Tourism for use in official events.
- 4.** His nephew is a director of LHR Asean Investment, which runs a network of petrol stations across the country.
- 5.** Hun Sen's eldest daughter, Hun Mana, owns newspaper Kampuchea Thmey Daily, which is read by almost 100,000 Cambodians.
- 6.** His niece is the chair of Gloria Jean's Coffees, which has six stores in Cambodia.
- 7.** Three of Hun Sen's children are listed as owners of company Electricity Private - which sells energy to the state.
- 8.** Hun Mana owns Bayon Media which broadcasts via three TV stations and on Bayon Radio, considered to be pro-government.
- 9.** The wife of Hun Sen's nephew chairs iOne, Cambodia's leading Apple retailer.

FIGURE 1: What business sectors do companies affiliated to the Hun family operate in?



Number of companies in sector with links to the Hun family

THE HUN FAMILY'S DOMINANCE OF THE ENERGY SECTOR

The Cambodian energy sector has also been fertile investment ground for the Hun family. Cambodian electricity prices are among the highest in the region and the world.⁶⁹ In July 2015, residents of the capital Phnom Penh complained after suffering seemingly arbitrary price increases despite unchanged usage patterns and frequent blackouts.⁷⁰ In October of the same year, Cambodians demanded lower petrol prices, noting that the crude oil prices had plummeted globally from more than US\$90 per barrel to US\$50, yet the price of gas in Cambodia had fallen only by 16%.⁷¹

Phnom Penh absorbs around 90% of the country's electricity, whereas rural areas - home to around 80% of the population - tend to lack access.⁷² This looks set to change. In 2013 Hun Sen promised that all Cambodian villages would have electricity by 2020, and 70% of households by 2030.⁷³ Given this meteoric expansion it is perhaps not surprising that the Hun family has significant stakes in the country's energy sector.

We were able to establish family links to five* energy companies.⁷⁴ Hun Maly's husband, Sok Puthyvuth, is the chair of Soma Energy, which the Ministry of Commerce lists as having a share capital of US\$10 million.⁷⁵ In 2012, the Soma Group signed an Memorandum of Understanding involving a US\$3 million biomass power deal with US corporate giant General Electric.⁷⁶ This deal was the first project to be implemented following General Electric's 2011 Alternative Energy Development Agreement with the Cambodian Government.⁷⁷

Hun To, who was accused of being part of an international drug-trafficking and money-laundering syndicate – allegations

he denied – is listed as the chair of oil company LHR Asean Import Export and agent and director of LHR Asean Investment.⁷⁸ The latter runs a network of petrol stations across Cambodia.⁷⁹

Cambodia's second largest domestic electricity supplier, Cambodia Electricity Private, is a joint venture between three elite families - the Hun family, along with the relatives of feared late police chief Hok Lundy and Cambodia People's Party senator Ly Yong Phat.⁸⁰ It runs the largest power station near Phnom Penh selling electricity to state energy provider Electricite du Cambodge.⁸¹ The company is jointly-owned by three of Hun Sen's children - Hun Manith, Hun Mana and Hun Maly – as well as Men Pheakdey, who is both Hok Lundy's widow and Hun Manith's mother-in-law and two of senator Ly Yong Phat's relatives.⁸² Dy Vichea, Mana's husband and Hok Lundy's son, was a shareholder in the company until he resigned in 2013.⁸³ As a member of the military, Hun Manith's directorship of the company is illegal under Cambodian law.⁸⁴

The Hun family also has links to petroleum company Kampuchea Tela. Bun Rany was a shareholder until she resigned on an undisclosed date.⁸⁵ Moeung Kompheak, Hun Mana's ex-husband and son of the head of the Ministry of Defense's Department of Logistics and Finances, was director general of the company before he divorced Mana.⁸⁶ In 2004, local media reported that Kampuchea Tela had signed a deal to supply petroleum to the Ministries of Interior and Finance.⁸⁷ It is unclear whether Bun Rany or Moeung Kompheak had resigned their involvement with the company by this point. In addition, the Ministry of Commerce lists Sok Puthyvuth as the chairperson of 'Tela E & P'.⁸⁸ Absolutely no information is publicly available on the company which led investigators to speculate that it is part of, or at least connected to, Kampuchea Tela. Regardless, it has long been suggested that Kampuchea Tela is a proxy of the Hun family and that the listed shareholders are nothing more than 'front men' there to conceal the involvement of the family.⁸⁹



In 2015 Hun Sen promoted his middle son, Hun Manith, to be the director of Cambodia's powerful military intelligence unit.



HUN SEN'S EVER-GROWING TITLE

Hun Sen's official title has become longer as his premiership has continued. Since 2007, he has been officially known by the title "Samdech Akka Moha Sena Padei Techo Hun Sen" which roughly translates as "Lord Prime Minister and Supreme Military Commander".

In May 2016, Associated Press reported that it had been called to a meeting by Cambodia's Information Ministry and instructed that all journalists must now use Hun Sen's full title in the opening lines of their coverage.⁹⁰

*The original version of this report stated that Jaya Holding Limited, a Cambodian company chaired by Hun Mana, was a subsidiary of a Singaporean company with a similar name. Since publication it has been brought to our attention that there is in fact no connection between the two companies.

A LOOK INSIDE HUN MANA'S INVESTMENT PORTFOLIO



Hun Mana and Dy Vichea. Photo obtained from Hun Mana's Facebook page.

Hun Sen's eldest daughter Hun Mana has the largest number of business holdings of any member of the family, with interests in 22 companies with listed share capital of more than US\$66 million.⁹¹ This figure is likely to be significantly higher as it excludes the capital of five companies for which Global Witness was unable to find financial data.

For 18 of the 22 companies Mana is listed as chair or director, giving her control over the companies' decision-making. Her business interests span many of Cambodia's major sectors, including energy, construction, tourism, financial services and gambling.⁹² She is currently looking to expand her business empire and is applying huge pressure on domestic private companies to grant her shares, according to a well-placed source in Cambodia.⁹³

MEDIA: Mana is one of only two media moguls in Cambodia to have holdings across radio, TV and newspapers.⁹⁴ She chairs and owns 100% of the shares of media company Bayon Media Hight System.⁹⁵ The company broadcasts via three TV stations – **Bayon TV**, **BTV News** and **ETV** – and also runs **Bayon Radio** which is considered to be one of the leading mouthpieces of

the Cambodia People's Party (CPP).⁹⁶ According to information obtained by Global Witness in 2010, as part of the Cambodian government's scheme known as the 'culture of sharing' under which private companies sponsor military units, Bayon TV and Radio sponsors two army battalions.⁹⁷ Mana also chairs and fully owns the newspaper **Kampuchea Thmey Daily**, which is one of Cambodia's most read Khmer-language newspapers and is also known to be pro-CPP.⁹⁸ Mana also chairs marketing and event management company **Bayon CM Organizer** which she jointly owns with Thailand's CMO Group.⁹⁹ Mana is the company's chair and also holds 25% of its shares.¹⁰⁰

ADVERTISING: Mana chairs **Moon Media** which specialises in outdoor advertising and is behind a large proportion of the billboards and large format ads you see around the country.¹⁰¹ The company's client list extends to a number of big international brands such as **Visa**, **Unilever**, **Procter & Gamble**, **Honda** and **Mango**.¹⁰² It also counts Mana's sister, Hun Maly, as a director and shareholder.¹⁰³

TOURISM: She is a shareholder in the **The Museum Company Ltd** which manages the **Angkor National Museum** in Siem Reap and is listed by the Ministry of Commerce as having capital of US\$2.5 million.¹⁰⁴ The museum showcases many of Cambodia's most precious artefacts taken from Angkor's vast network of ancient temples and, each year, a large proportion of Siem Reap's one million visitors pay the US\$12 entry fee.¹⁰⁵ Mana also chairs the **MLM Resort Group** for which no further information is available.¹⁰⁶

Here is an overview of some of the international and domestic companies that Hun Mana has interests in or is affiliated to:





Moon Media is chaired by Hun Mana and boasts an impressive client list including Visa, Unilever and Tiger Beer.

AVIATION: Mana is listed as chair of three Cambodian-registered aviation companies – Helistar, Star Aviation and Star Airline.¹⁰⁷ No information is available for the latter two, but Helistar is best known for tourist flights around the Angkor temples which cost up to US\$5,000.¹⁰⁸ Flying out of military air force bases in Phnom Penh and Siem Reap, the company also specialises in chartered helicopter flights for government officials, VIPs, agricultural concession surveys and mining exploration.¹⁰⁹

MANUFACTURING: **NVC Corporation**, of which Mana is chair, is a food and beverage manufacturer that makes **Vital Premium Water**, one of the Cambodia’s leading bottled water brands.¹¹⁰ Vital Water’s website states that it “...is the only national product that was accepted as an official partner for use in the Asian Tourism Forum in 2011 in Cambodia. The Ministry of Tourism also recommends its use officially for any national and internal ceremonies”.¹¹¹ The company shares a registered address with more than 30 companies belonging to powerful CPP senator Lao Meng Khin, his wife Choeung Sopheap (also known as Yeay Phu) and their family members.¹¹² The couple own companies Shukaku Inc. and Pheapimex that have been

responsible for widespread illegal logging and land grabs, which have displaced thousands of people.¹¹³

FINANCE: Mana has interests at least two companies in the finance sector. She is a director and shareholder in **Royal Group Investment Company**, which is chaired by Kith Meng, arguably Cambodia’s most prominent business tycoon with extensive interests in banking, agriculture, hydropower, media, real estate and telecoms and known for involvement in land grabbing and illegal logging.¹¹⁴ Mana is also listed by the Ministry of Commerce data as the ‘representative’ of **NH Holding** which appears to be affiliated to the ‘5 Siblings’ construction firm that is linked to the family of CPP senator Lao Meng Khin.¹¹⁵ She also chairs registered companies Ocas Cambo Investment Group and Ocas Cambo Investment whose names suggest may also be in the finance sector.¹¹⁶

TELECOMS: Through NH Holding, Mana has a six percent shareholding in Viettel (Cambodia) which owns Cambodia’s largest mobile phone provider **Metfone**.¹¹⁷ **Viettel (Cambodia)** is part of Vietnam’s largest mobile network operator, the **Viettel Group**, which is a fully state-owned enterprise operated by the country’s Ministry of Defence.¹¹⁸ Joining Mana as a shareholder

in Viettel (Cambodia), and adding to the company's links to the military, is Tao Toeun, the wife of Cambodia's National Defense Minister General Tea Banh.¹¹⁹ In 2010, Hun Sen publicly endorsed Metfone and advised all Cambodian soldiers to use the company.¹²⁰ Also in telecoms, Mana appears to be affiliated to the Dragon Royal Group via her chairmanship of its telecommunications arm, Dragon Royal Telecom which lists share capital of US\$2 million.¹²¹ The Group owns a luxury hotel and condominium in Siem Reap and has plans to expand into pharmaceuticals, property, petroleum and other natural resources.¹²² Mana is also a director and shareholder of **K Thong Huot Telecom**, which was founded in 2002 to distribute **Nokia** phones in Cambodia.¹²³ The firm is also the local business partner of **Lenovo-IBM**, and holds exclusive distribution licences for **Pioneer** and **Electrolux** products.¹²⁴

ENERGY: Along with three other members of her family and two of senator Ly Yong Phat's relatives, Mana is a director of and shareholder in **Cambodia Electricity Private**, Cambodia's second largest domestic electricity supplier.¹²⁵ Ly Yong Phat and his wife, Kim Heang are infamous for owning sugar companies which have committed human rights abuses, including violent forced evictions and land grabbing, child labour, and the use of the military to intimidate villagers.¹²⁶ In a letter to Global Witness dated 25th January 2016, Yong Phat and Heang denied all allegations made in this report against both them and their companies, the LYP Group and Kampong Speu Sugar.

CONSTRUCTION: Mana chairs company **NVN Corporation**, which appears to be in the construction sector and lists capital of US\$0.5 million. She also has interests in the sector via **NH Holding**.¹²⁷ Both companies appear to have strong links to the family of CPP senator Lao Meng Khin.¹²⁸ Mana also chairs **Orkidé Villa 3**.¹²⁹ The Ministry of Commerce lists a similarly-named company, **Orkidé Villa**, chaired by tycoon Khieu Sar Sileap who has multiple business links to associates of the Hun family.¹³⁰ Both companies are registered to the same address.¹³¹ In November 2015, local media described Orkide Villas as one of Cambodia's "fastest-growing developers" after Sileap announced publicly that the company will be building a US\$350 million condominium and mall project that will cover a 36-hectare area of Phnom Penh.¹³²

In January 2016, Global Witness contacted Hun Mana and the other people and companies mentioned in this chapter, except for Moeung Kompheak who was unreachable. In our letters we requested comments in response to the evidence detailed above. Only Sok Puthyvuth replied. His email is outlined on page 20.



A forest patrol unit using a helicopter belonging to Helistar, which is chaired by Hun Mana. Photo obtained from the Wildlife Alliance's Facebook page in March 2016.



Child working on a sugar plantation owned by special economic advisor to Hun Sen and powerful CPP senator, Ly Yong Phat.

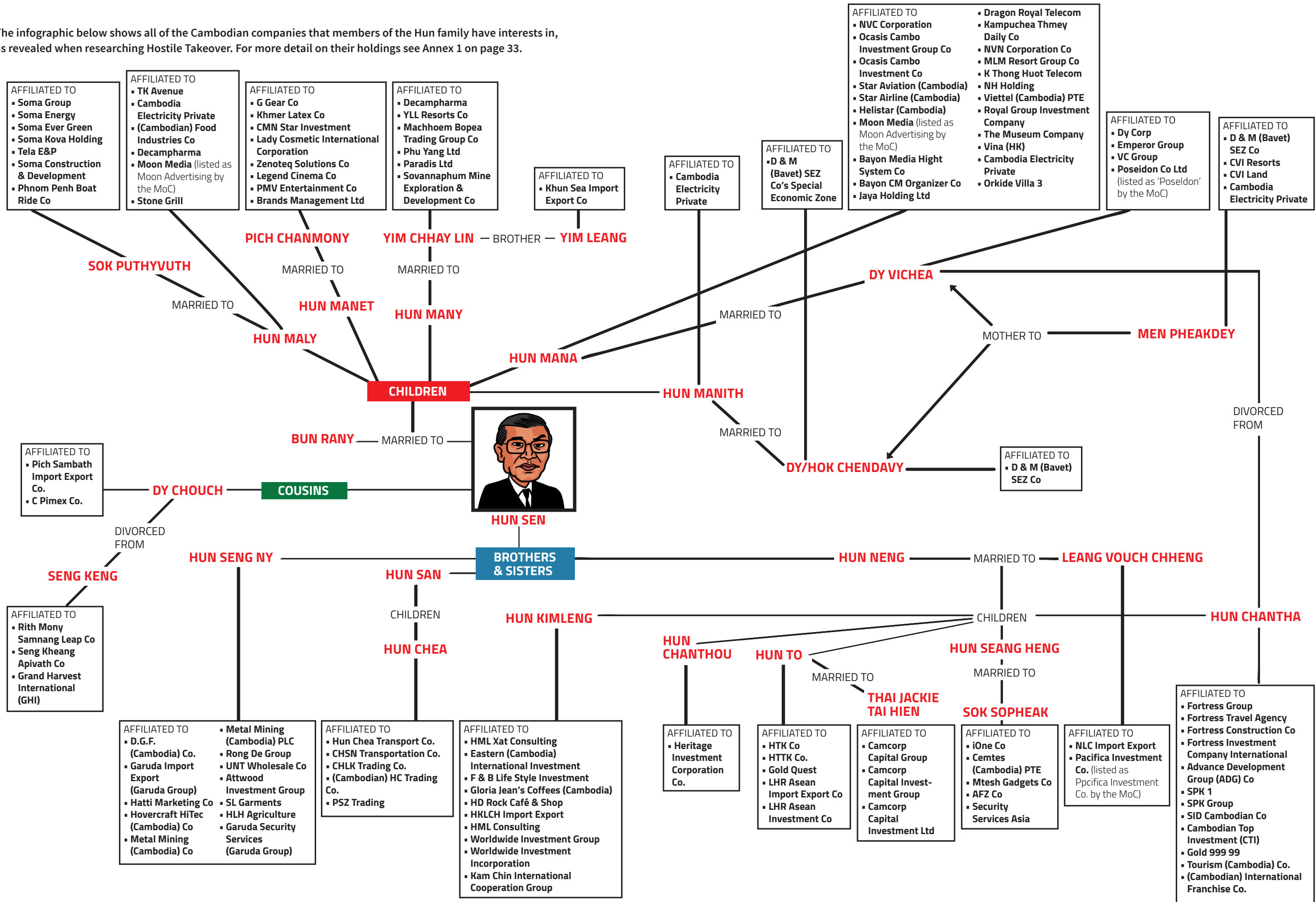


A POLITICAL DYNASTY OF OKNHAS

Traditionally supposed to be reserved for those who contribute to the public good, the "oknha" title is now bestowed on business people who make donations of at least US\$100,000 to Hun Sen's party. In return they increase their chances of securing lucrative government contracts or licences to extract natural resources. By 2014 there were at least 700 oknhas, compared to just 20 a decade earlier.¹³³ This highlights the increasingly blurred lines between the state and private sector as well as the rapid expansion of Hun Sen's patronage network. Many oknhas are implicated in violating human rights and causing environmental destruction with impunity.

Global Witness urges the Cambodian government to strip those found to be violating Cambodian laws or international human rights standard of the honorific title 'oknha and bring an end to the system under which the title is granted in return for a US\$100,000 donation.

The infographic below shows all of the Cambodian companies that members of the Hun family have interests in, as revealed when researching Hostile Takeover. For more detail on their holdings see Annex 1 on page 33.



THE HUN FAMILY'S LINKS TO INTERNATIONAL BRANDS

Cambodia has experienced rapid economic growth for the past two decades and increasing numbers of international companies and investors have flocked to enter the market, enticed in part by Cambodia's minimal regulatory red tape and its cheap labour force.¹³⁴ In 2015, the UK was the second-largest foreign investor in Cambodia after China.¹³⁵ The US is Cambodia's largest trading partner and export market, and trade between the two countries totals around US\$3 billion a year.¹³⁶ The two countries are currently negotiating a Bilateral Investment Treaty with the aim of spurring additional US investment in-country.¹³⁷

The Hun family are major gatekeepers to this influx of foreign capital into Cambodia, and have managed to establish business relationships with numerous big global brands. These links include formal partnerships, franchising, exclusive distribution deals and client relationships. These international companies are clearly either unaware of or unconcerned by their choice of business partners, whose family relationship to Hun Sen should raise red flags regarding the potential risk of corruption.

Below are the Hun family links to international brands that Global Witness was able to identify, it is likely many more exist.

Sok Sopheap, the wife of Hun Sen's nephew Hun Seang Heng, is linked to two global electronics giants. She chairs **iOne**, Cambodia's leading **Apple** retailer, and also chairs **Cemtes**,

a company whose website suggests it is Cambodia's 'Authorised Agent' for **Canon** products.¹³⁸ Pich Chanmony, Hun Manet's wife, chairs **G Gear**, which is the exclusive Cambodian supplier and retailer of products made by South Korean multinational **LG Electronics**.¹³⁹

Also in electronics, Hun Mana is director and shareholder of **K Thong Huot Telecom**, a partner of computer manufacturer **Lenovo-IBM** which claims to have exclusive distribution rights for **Electrolux** and **Pioneer** products in Cambodia and **Nokia Mobile** in Cambodia and Laos.¹⁴⁰ Nokia was acquired by **Microsoft** in 2014.¹⁴¹

Hun Mana chairs **Moon Media**, of which her younger sister Hun Maly is a shareholder.¹⁴² Listed as 'Moon Advertising', the company specialises in outdoor marketing and boasts a client list which includes international big names such as **Visa**, **Unilever**, **Procter & Gamble**, **Honda**, **Mango**, and **Tiger beer**.¹⁴³

Hun Maly meanwhile is the chair of **TK Avenue**, a high-end shopping mall in Phnom Penh.¹⁴⁴ It houses shops including **Mango**, **Zara** and **Adidas**, the Singaporean chain **Guardian Pharmacy**, **Aussino furniture**, **Shiseido cosmetics**, **Pedro Footwear and Accessories** and **Samsung**.¹⁴⁵

Her husband, Sok Puthyuth, is the CEO of the Soma Group.¹⁴⁶ In 2012, Soma Energy signed a US\$3 million biomass power deal with US conglomerate **General Electric (GE)**.¹⁴⁷ Forbes lists GE as the world's tenth most valuable brand and puts their annual sales at US\$122 billion.¹⁴⁸

Hun Sen's niece, Hun Kimleng, can also claim strong links to international brands. She is chairperson of **Gloria Jean's**



2009 opening of the Phnom Penh iOne store, Cambodia's first Apple retailer. iOne is chaired by Hun Sen's niece.



Hun Kimleng. Photo obtained from the Prae Legal website.

Coffees Cambodia, and is listed as the chair, board director and 75% shareholder of **Hard Rock Café's** Cambodia branch.¹⁴⁹ Kimleng's conglomerate Worldwide Investment Group boasts on its website of having helped bring to Cambodia Japanese food chain **Yoshinoya**, and the luxury **Emperors of China Restaurant**.¹⁵⁰

Pich Chanmony, Hun Manet's wife, who is listed as chair of seven companies by the Ministry of Commerce, is also a director and shareholder of food and beverage franchise company Brands Management.¹⁵¹ The company has so far brought Taiwanese bubble tea company **Chatime**, Malaysia's **myBurgerLab**, and Thailand's Boat Noodle to Cambodia.¹⁵² Its website lists its partners as including **Heineken Beer** as well as a number of companies associated to the Hun family.¹⁵³ Chanmony is also listed as the chair of Legend Cinema, the first theatre to secure the rights to screen big Hollywood blockbusters in Cambodia.¹⁵⁴

Hun Seny Ny, the prime minister's younger sister, chairs UNT Wholesale.¹⁵⁵ The company imports a range of big-brand products into Cambodia including **Durex** condoms, **Nescafé Gold** coffee and **Nestlé** ice cream.¹⁵⁶ She is also a 50 per cent shareholder in Attwood Investment Group which is closely linked to Attwood Import Export, the largest distributor of high-end alcoholic beverages in Cambodia.¹⁵⁷ Attwood Import Export brings in an array of internationally-branded alcohol into Cambodia and has exclusive distribution rights for **Johnnie Walker**, **Hennessey** and **Corona** beer.¹⁵⁸

Seng Keang, the ex-wife of Hun Sen's cousin Dy Chouch and close associate to Bun Rany, is listed as the chair of garment manufacturer Grand Harvest International, an affiliate of Hong Kong-based GHI Enterprise Ltd which manufactures garments for some of the world's leading brands, including **Tommy Hilfiger**, **Polo Ralph Lauren**, **All Saints**, **Armani Exchange**, **Forever 21** and **Fred Perry**.¹⁵⁹

Hun Many's wife, Yim Chhay Lin, meanwhile chairs **Decampharma**, which is listed as having share capital of US\$50,000.¹⁶⁰ Her sister-in-law Hun Maly holds 10% shares in the company, while Danish pharmaceutical company **Missionpharma** holds 35%.¹⁶¹ Missionpharma is a "grade A" pharmaceutical wholesaler for projects financed by the US government's development arm USAID.¹⁶²

Global Witness wrote to **Missionpharma** in December 2015. The company responded on 26th January 2016 and confirmed the shareholding, but stated that Decampharma is currently inactive. The company also stated that it does not supply USAID directly but instead supplies projects in Africa run by different implementing partners under USAID funding. Missionpharma has no funded activities in Cambodia.

THE RISKS FOR FOREIGN INVESTORS

Beyond the ethical considerations that foreign investors should weigh up when considering a commercial relationship with the Hun family, conducting business with them or other Cambodian elites can also present a number of serious legal, financial and reputational risks. Due to a lack of transparency and pervasive corruption, all business transactions involving the Cambodian government, including public procurement, infrastructure contracts and natural resource allocation, present heightened risk for foreign investors.¹⁶³ Companies considering a deal which in any way involves the state should conduct enhanced due diligence to ensure it's free from the risk of corruption.

In terms of the domestic legal framework, Cambodia's 2010 Anti-Corruption Law makes illegal any act that knowingly benefits from corruption.¹⁶⁴ Any international company which exploits its relationship to the Hun family to procure deals involving state resources or infrastructure could theoretically be vulnerable to criminal charges for benefitting from corruption and patronage. Either this is happening with their knowledge, in which case they could face a prison sentence and a fine, or they urgently need to improve their due diligence procedures to ensure they understand who they are doing business with.¹⁶⁵

Companies should not bank on the Cambodian government's habit of breaking or ignoring its own laws in this regard, either. Foreign investors also risk falling foul of powerful anti-corruption legislation in other jurisdictions such as the UK and US. The 1977 US Foreign Corrupt Practices Act (FCPA) prohibits "offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to a foreign official in order to influence any act or decision of the foreign official in his or her official capacity or to secure any other improper advantage in order to obtain or retain business".¹⁶⁶ It also prohibits a company from making a corrupt payment to a foreign official through a third party or intermediary.¹⁶⁷ These anti-bribery provisions apply to US persons and businesses, but also to any company that is listed on US stock exchanges or required to file periodic reports with the Securities Exchange Commission (SEC).¹⁶⁸ They can also be extended to cover any transaction conducted in US dollars.¹⁶⁹ This puts investors in Cambodia at particular risk since the US dollar is the only currency used for non-local business transactions in the country.

Meanwhile the 2010 UK Bribery Act applies to UK nationals or residents, as well as organisations that were either established in the UK or conduct at least some part of their business in the UK.¹⁷⁰ It prohibits a person from offering, promising, or giving a "financial or other advantage to another person" and applies to both the public and private sectors.¹⁷¹ Like the FCPA, the UK Bribery Act also extends to cover corrupt practices by a third party.¹⁷²

Similarly, under Australia's 1995 Criminal Code it is an offence to provide or offer to someone (directly or indirectly) a benefit that is not legitimately due to that person with the intention of influencing a foreign public official in the exercise of their duties in order to obtain or retain business or a business advantage.¹⁷³ Australian authorities can prosecute companies and individuals for such offences provided a sufficient connection can be established between the entity under investigation and Australia – namely either the offence was committed in Australia or by an Australian citizen or corporation.¹⁷⁴

Along with 38 other countries, the UK, US and Australia are signatories of the 1997 Anti-Bribery Convention of the Organisation for Economic Co-operation and Development (OECD), which also presents risks for investors.¹⁷⁵ The Convention establishes legally-binding standards for states to criminalise the bribery of foreign public officials in international business transactions.¹⁷⁶ Under the Convention, all 32 member countries of the OECD – which in addition to the UK, US and Australia also include major Cambodian investors Japan, Korea and Canada – are required to prosecute its nationals for offences committed abroad.¹⁷⁷

These risks are very real, as recent history shows. In March 2016, the CEO of Australia's main stock exchange was forced to resign over allegations that a gambling company he once managed had bribed the Hun family several years ago.¹⁷⁸ Australian company BHP Billiton was found to have made a payment to the Cambodian government in 2013 in exchange for mining exploration rights in a deal that was allegedly overseen by Hun Sen himself.¹⁷⁹ In a letter to Global Witness in 2008, the company confirmed having paid the government US\$1 million, but stated that it was a formal transaction in accordance with the terms of the mineral exploration agreement. Despite their denials, these allegations against BHP Billiton, among others, led to an investigation by both the US Securities Exchange Commission (SEC) and the Department of Justice, and the company eventually agreed to pay a US\$25 million penalty to the SEC for violating the FCPA.¹⁸⁰ This is a stark illustration of

the major legal risks around corruption that extend beyond a company's own jurisdiction or where they operate.

“American investors are generally reluctant to resort to the Cambodian judicial system to resolve commercial disputes because the courts are perceived as unreliable and susceptible to external political influence or bribery. Both local and foreign businesses report frequent problems with inconsistent judicial rulings, corruption, and difficulty enforcing judgments. For these reasons, most commercial disputes are currently resolved through negotiations facilitated by the Ministry of Commerce, the Council for the Development of Cambodia, the Cambodian Chamber of Commerce, and other concerned institutions.”¹⁸¹*

– US State Department's '2013 Investment Climate Statement for Cambodia'

**It should be noted that all three institutions listed by the US State Department for resolving commercial disputes are under the control or influence of Hun Sen. As prime minister he controls the Ministry of Commerce, he chairs the Council for the Development of Cambodia and his close business associate and personal friend, Kith Meng, is the president of the Cambodia Chamber of Commerce.¹⁸² This means that the very institutions supposedly conducting commercial dispute resolution in the absence of a functioning judiciary are controlled by corrupt elites and cannot be relied upon to be independent.*

A SINGLE HUN FAMILY RESPONSE TO GLOBAL WITNESS ALLEGATIONS

In January 2016, Global Witness wrote to all 27 members of the Hun family mentioned in this report including the prime minister. Only Hun Maly's husband, Sok Puthyvuth, responded, with a long email dated 8th February. Here are some excerpts:

- “I see many issues and many obvious solutions, but I have seen again and again that the good solutions are seldom implemented correctly...
- For many years, my family has objected to my taking a role at the governmental level. So I have chosen the private sector to test my ability to build an effective organization.
- I can understand your assumption that I have abused my power to get to where I am today, but I can assure you that I take seriously the challenge of building a responsible and respected private sector group. I admit it is a work in progress.
- I understand that I live in the shadows of my family.
- I hope that my activities and our group can help support the development of Cambodia in some way or form. With more human resource capacity and stronger institutions, I hope we can speed up the process of healing and help make Cambodia a model country that will positively contribute to the global community in the future.
- Once again thank you for your interest in Cambodia. I look forward to see real understanding and the positive impact from the work of Global Witness to help my country, the international community, and the world.”

THE HUN FAMILY'S DISREGARD FOR THE LAW

One of the key themes to characterise the Hun kleptocracy is impunity.¹⁸³ Cambodia's judiciary is firmly under the prime minister's control, lent on to protect his family's interests by ignoring their legal infractions and criminalising their critics.¹⁸⁴ As a result, family members and the companies they are affiliated to have routinely broken the law seemingly without fear of prosecution. At best this has may have shielded the Hun family from facing the consequences of petty crimes or bad behaviour.¹⁸⁵ At worst, forced evictions in which whole communities have faced being uprooted from their homes or robbed of their farmland or forests have gone unpunished.¹⁸⁶

This chapter provides examples of some of the key ways in which members of the Hun family, and the companies linked to them, have been able to get away with breaking a range of Cambodian laws including anti-corruption provisions as well as those designed to protect human rights, social justice and the environment.



Members of Hun Sen's thousands-strong bodyguard unit which functions as his private army and is central to maintaining his grip on power.

“The judiciary in Cambodia is corrupt and deteriorating, making it virtually useless as a tool for ordinary people to secure redress. Authorities and well-connected elites also frequently abuse the court system, using criminal charges as a tool to intimidate, harass and demobilize human rights activists. Meanwhile, for many real crimes, impunity reigns: People of wealth and influence pay their way out of police custody and the courts.”¹⁸⁷

– Licadho, a leading Cambodian human rights NGO

CASHING IN ON STATE RESOURCES

Polling by the International Republican Institute and USAID across all 24 Cambodian provinces in 2013 found that “more corruption” and “nepotism” were two of the three top reasons respondents gave as to why the country was headed in the “wrong direction.”¹⁸⁸

The Hun family is Cambodia's prime example of a culture of nepotism enjoyed by its privileged elite, in which political allegiance opens doors on to vast wealth.¹⁸⁹ For decades, this small group has helped itself to huge chunks of Cambodia's land, forests, and other natural resources, without facing hard questions from the country's aid donors or business partners. With few natural assets left to plunder, *Hostile Takeover* shows how the elite has diversified and expanded its corrupt model to the rest of the Cambodian economy.

This investigation has uncovered numerous examples of where companies linked to members of the Hun family have managed to secure lucrative public contracts and state concession licences. Given Hun Sen's history of corruption and the lack of transparency in Cambodia's opaque public sector, this pattern should raise serious alarm bells. It suggests that his family members could have received special treatment in the allocation of state resources. This is despite the fact that Cambodia's Criminal Code and 2010 Anti-Corruption Law criminalise the granting of unfair advantages or preferential treatment by the state in return for any kind of donation, gift or promise.¹⁹⁰

Members of the Hun family need to provide evidence to show that these state resources have been allocated to their companies in a way which is legal and free from corruption. Unless otherwise explained, the examples below would certainly seem to be grounds to suspect grand corruption:

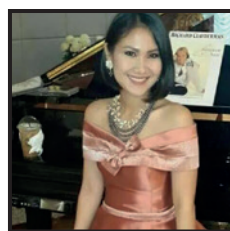
- Members of the family and their business associates have been granted numerous concessions in the natural resource sector, including licences for mining projects in at least five provinces, a sand dredging licence for a four-kilometre stretch of the Mekong River, and at least three Economic Land Concessions for agriculture.¹⁹¹
- Construction firm Soma Construction & Development, which is chaired by Hun Sen's son-in-law Sok Puthyvuth, has the contract to build the office of Cambodia's State Secretariat of Civil Aviation and is part of the US\$100 million project to expand Phnom Penh airport.¹⁹²

- Of the 31 Special Economic Zones (SEZs) which Global Witness was able to obtain ownership information for (out of a total of 34), 2 have been allocated to companies belonging to members of the Hun family. Authorisation for at least an additional ten has been granted to business tycoons with links to family members.¹⁹³
- Cambodia's second-largest domestic energy supplier, Cambodia Electricity Private, is part-owned by Hun Mana, Hun Manith and Hun Maly. It sells electricity to state energy provider Electricité du Cambodge, representing a serious conflict of interest.¹⁹⁴
- The government granted the licence to operate Le Macau Casino to Vina (HK), a company that is chaired by Kim Heang, wife of senator Ly Yong Phat, and counts Hun Mana as a shareholder.¹⁹⁵ In a letter to Global Witness dated 25th January 2016, Heang denied benefitting from a system of patronage that is headed by Hun Sen and which amounts to grand corruption.
- The Ministry of Tourism recommends that Vital Water made by NVC Corporation, which Hun Mana chairs, is used in all national and internal ceremonies.¹⁹⁶ According to the company's website, Vital Water was the only national product that was accepted as an official partner for use in the Asian Tourism Forum in 2011 in Cambodia.¹⁹⁷
- Hun Kimleng's HML Law Firm & Consultants boasts on its website that it is "*particularly well-positioned to ensure good cooperation and results*" from lobbying government ministries and offices.¹⁹⁸ In particular, the company claims to deliver results when dealing with the Council for the Development of Cambodia, Cambodia's highest government body overseeing investment which is chaired by Hun Sen himself.¹⁹⁹
- Following the Cambodian government's 2011 Alternative Energy Development Agreement with General Electric, Sok Puthyvuth's company, the Soma Group, signed an MoU involving a US\$3 million biomass power deal with the US conglomerate.²⁰⁰

THE COST TO PEOPLE AND ENVIRONMENT

The extent of the Hun family's private sector holdings, their apparent access to lucrative state resources and their immunity to Cambodia's legal system, point strongly to the fact that Hun Sen's Cambodia is built on grand corruption. These are far from victimless crimes: the Hun hegemony has had devastating consequences for the country's population and many of their companies have got away with ignoring Cambodian law and harming people and the environment in the process.

Below are some specific examples of the Hun family's terrible social and environmental footprint:



Hun Mana. Photo obtained from her Facebook page.

- Hun Sen's eldest daughter **Hun Mana** was director of and shareholder in Chinese company **WS Mining Industry Holdings** from 2009 to 2012.²⁰¹

In 2008 the company was granted a 97,000-hectare exploration licence (an area roughly the size of the German capital Berlin) on Kuy indigenous land in northern Cambodia, where communities subsisted largely from artisanal mining, small-scale agriculture and collecting non-timber forest products.²⁰² Once the company's mining exploration began, these communities were forced away from the natural resources which had sustained them for generations, eliminating a major source of their livelihood and pushing them deeper into poverty.²⁰³ The military was drafted in to guard WS Mining operations, with soldiers from Hun Sen's Bodyguard Unit allegedly in charge of security.²⁰⁴ Soldiers cordoned off access to many of the community's rice paddy fields, and cyanide was used to leach gold from the ground, illegally contaminating the water supply. Many people reportedly fell ill and much of their livestock died.²⁰⁵ In contravention of Cambodian law, local authorities say that the company brought in workers from China rather than hiring locals to work at the mine.²⁰⁶

Hun Mana cut ties with WS Mining in 2012, but these problems have still not been resolved.²⁰⁷



Phnom Penh resident facing eviction by a company linked to the Hun family removes the live cobra that thugs threw through his window in 2013.

- Brother-in-law to Hun Many, **Yim Leang**, has held ten per cent of company **Khun Sea Import Export** since February 2011 when tycoon Khun Sear, who still holds the remaining 90 per cent of the company, transferred over his shares.²⁰⁸ Khun Sear is described by local press as "*a politically connected businessman who has major interests in agriculture and real estate*."²⁰⁹ The company lists capital of US\$2 million on the Ministry of Commerce database.²¹⁰ It was awarded an 8,200 Economic Land Concession to grow rubber and other crops in Oddar Meanchey Province's Kulen Promtep Wildlife Sanctuary on 6th July 2012, less than 18 months after Leang became



Police beating a man during a crackdown on striking workers from SL Garments. Factory workers claim Hun Sen's sister is the company's Director General.

a shareholder.²¹¹ This allocation of land by the government occurred two months after Hun Sen placed a moratorium on the issuance of new concessions.²¹²

In addition, Khun Sea Import Export came into conflict with residents of Phnom Penh's Tuol Kork district when it attempted to get hold of their land for redevelopment. The company is accused of carrying out forced evictions and enlisting thugs to intimidate and assault residents who refused to move, including by using arson and throwing live cobras into their homes.²¹³ The dispute was listed in a case filed at the International Criminal Court in October 2014 which describes the associated crimes committed by Khun Sea Import Export as *'Several episodes of assault and attempted murder against [name of victim removed due to security concerns], persecution on political grounds'*²¹⁴. The case, which lists the company among tens of others to have committed the crime of forcible transfer in Cambodia, argues that the Cambodian government, state security forces and government-connected business leaders have committed 'crimes against humanity' against Cambodian civilians during their widespread and systematic campaign of land seizures.²¹⁵

When asked by local reporters about the case, Yim Leang confirmed that he did own the land, but claimed that he was not aware of any issues with local residents.²¹⁶ Due to his position in the Cambodian army, Leang's shareholding in Khun Sea Import Export contravenes Article 25 of the 1998 General Statute of Military Personnel of the Royal Cambodian Armed Forces which prohibits military personnel from *"conduct[ing] any business which may harm the honour and dignity of the Royal Cambodian Armed Forces"*.²¹⁷

- **Sok Puthyuth**, Hun Maly's husband and CEO of the Soma Group conglomerate, is also linked to an urban land grab.²¹⁸ **Soma Construction & Development**, which he chairs, is part of the team expanding Phnom Penh International Airport, a project which began in 2014 and is rumoured to be costing US\$100 million.²¹⁹

The project threatens to displace approximately 165 households - residents were told that their homes would all be destroyed, but that they wouldn't be receiving compensation despite having possession rights to their land under Cambodia's 2001 Land Law.²²⁰ In 2012, eight protesters from the community were arrested by armed police and detained for 12 hours after painting SOS signs on the roofs of their houses in the hope that President Obama would see their cries for help as he flew in to attend the ASEAN summit.²²¹ A year later, having identified that the International Finance Corporation (IFC) was part-financing the project, 59 potentially-affected households lodged a formal complaint with the IFC's ombudsman concerning possible forced evictions. The complaint remains open at time of writing.²²² Work on the airport now appears to have stalled, but Cambodian land expert told Global Witness that the communities fear the delay is just a ploy to prevent protests ahead of Cambodia's commune elections in 2017.²²³ In May 2016, local media reported that 531 families potentially affected by the airport's expansion conducted a public protest outside the Council of Ministers urging it to resolve the dispute which had been ongoing at that point for four years.²²⁴ The land dispute is yet to see a resolution.



Forest loss in Cambodia accelerated faster than in any other country between 2001 and 2014 thanks to rampant illegal logging and land grabbing by the country's ruling elite. © Global Witness

■ **Seng Keang**, ex-wife of Hun Sen's cousin Dy Chouch and close associate to Bun Rany, was exposed by Global Witness in 2007 as leading Cambodia's premier logging syndicate which had allegedly committed multiple crimes including corruption, kidnapping and attempted murder.²²⁵ She was again linked to illegal logging in 2012, this time in and around Vietnamese-owned rubber plantations. In addition to causing widespread deforestation, local communities described to Global Witness investigators how the logging was devastating their livelihoods which previously relied upon collecting tree resin in order to make an array of local products.²²⁶

Despite the substantial evidence of her involvement in illegal logging and other crimes, Seng Keang chairs three companies.²²⁷ As far as Global Witness is aware, no legal action has even been taken against her.



Hun Seng Ny. Photo obtained from <http://www.johnnyhon.com/Gallery/Cambodia/photos.htm>

■ **Hun Seng Ny**, the prime minister's younger sister, is linked to three companies that have been accused of breaking Cambodian laws without facing legal consequences.

According to local communities, media and human rights workers, she has a major stake in **HLH Agriculture**.²²⁸ The company is part of the Singapore-based HLH Group which is currently building a luxury apartment complex

and shopping mall in Sihanoukville and recently announced a US\$10 million investment in a 400-hectare agricultural food-processing park.²²⁹ Global Witness wrote to the company in December 2015 asking them to respond to the allegation that they have links to Seng Ny. In their reply, dated 7th January 2016, they failed to either confirm or deny the connection. In 2010, in response to allegations of land grabbing, government officials and a manager at HLH Agriculture denied Seng Ny's connection to the company to local reporters.²³⁰

HLH Agriculture has reportedly been embroiled in a land dispute with villagers in Kampong Speu since 2010 and has been accused by local communities of illegal logging in the Phnom Oral Wildlife Sanctuary in 2013.²³¹ A 2012 report by the UN Special Rapporteur on the 'Situation of Human Rights in

Cambodia' details how the company came into conflict with indigenous Suy communities when it flooded their agricultural fields and contaminated local water sources.²³²

In June 2014, a fully-owned subsidiary of the HLH Group, D'Lotus Development, signed an agreement to buy part of the land that used to be Boeung Kak Lake from private company Shukaku Inc. in contravention of Cambodia's Land Law which prohibits one concessionaire from selling on land to another.²³³ One of the most high-profile land grabs in Cambodia, the allocation of Boeung Kak Lake to Shukaku Inc., owned by CPP senator Lao Meng Khin and his wife Choeung Sopheap, led to the illegal displacement of 4,000 families. As a result, in 2011, the World Bank suspended all new direct financing to Cambodia.²³⁴ In the face of substantial opposition from the Boeung Kak Lake communities and civil society, the Bank reversed this decision in May 2016 despite many affected community members still not having received free or fair compensation for their losses.²³⁵

Global Witness put these allegations to HLH Agriculture in our letter of December 2015. In the response, HLH Group confirmed that D'Lotus Development had entered into an agreement with Shukaku Inc. to acquire land. The letter stated that during the course of the negotiations over Boeung Kak Lake neither HLH Group nor D'Lotus Development had any dealings with her or Hun Sen. The agreement with Shukaku Inc. was apparently terminated in December 2014 "due to commercial reasons". The company's letter makes no reference to the fact that, were the deal to go ahead, it would have been illegal.

Hun Seng Ny also appears to have links to the **SL Garment** factory where workers claim they were told she was director general of the company. In 2013, 75 private security guards from the security wing of Seng Ny's company, the **Garuda Group**, were sent into the factory to deal with striking workers.²³⁶ Trade Union officials accused the Garuda security guards of intimidating and using violence against striking workers.²³⁷ In April 2016, an investigation conducted by a conservation organisation and published in international media, alleged that SL Garments' factory is burning illegally-logged timber taken from protected areas to heat water for washing machines and steam presses.²³⁸

According to the Ministry of Commerce data, Seng Ny is also a 50 per cent shareholder in **Attwood Investment Group**.²³⁹ The company is chaired by prolific businesswoman Lim Chhiv Ho and was revealed by Global Witness to be linked to a smuggling operation involving the military in 2007.²⁴⁰ Local media reported in 2009 that the Preah Sihanouk provincial authorities had accused the company of illegally dredging thousands of tonnes of sand using unlicensed boats. Local people claimed that the dredging was destroying fish stocks and negatively impacting upon their livelihoods, allegations that the company denied.²⁴¹

At time of writing, Global Witness was unaware of any investigations by the authorities into these allegations let alone punitive actions being taken against any of the perpetrators.

TAKING ADVANTAGE OF PERSONAL IMPUNITY

As information on company ownership in Cambodia is sketchy at best, it is perhaps not surprising that Cambodian citizens have been unable to hold the Hun family to account for the illegal activities of companies they are linked to, particularly when those links are hidden. However, the level of impunity enjoyed by the family extends well past corporate wrongdoing to also cover crimes committed by family members as individuals.

The three people profiled below provide examples of where family members appear to have got away with committing serious crimes, but have gone on to be granted honorific titles or powerful positions within the state apparatus as well as managing to accumulate numerous business holdings.



■ Hun Sen's nephew **Hun To** was named as a 'major drug trafficker' in interviews conducted by Global Witness with well-placed sources in 2006.²⁴² The same investigation also revealed that he had links to Cambodia's premier logging syndicate at the time.²⁴³ Hun To was back in the limelight in 2012 when

a media report again connected him to the trafficking of US\$1 billion worth of narcotics to Australia – allegations he denies.²⁴⁴ The Age newspaper alleged that Hun To was the subject of a multi-year-long investigation by an Australian Crime Commission into heroin trafficking and money laundering, where drugs were smuggled in shipments of timber. Australia's plans to arrest and question To in Melbourne were allegedly derailed when the Australian Foreign Ministry denied him a visa on the basis that his arrest by Australian Police could cause a 'diplomatic incident'.²⁴⁵



McLaren P1. Photo obtained from Hun To's Facebook page.

Known as something of a playboy, Hun To is said to own several luxury cars, allegedly including a customised McLaren P1 estimated to cost in excess of US\$1 million.²⁴⁶

He was also rumoured to be the owner of Phnom

Penh's former rich-kid hang out Spark Nightclub and is listed as the chair of four companies as well as director of LHR Asean Investment which runs a large network of petrol stations across Cambodia.²⁴⁷



■ **Dy Proem**, Hun Sen's cousin, was sentenced to two-and-a-half years in jail in 2011 for bribing a civil servant US\$200,000 to forge a deed to a plot of land. The fake document granted Proem ownership of 5.6 hectares of land in Phnom Penh which actually belonged to an elderly widow.²⁴⁸ No warrant to

imprison her was ever issued, however. Instead, Dy Proem was given the title of *oknha*.²⁴⁹ Traditionally a rare title of nobility bestowed by the king, today the *oknha* title is handed out by government to people who donate US\$100,000 to Hun Sen's political party, and make a vague commitment to direct some of their wealth toward 'the greater good'.²⁵⁰

In February 2016, shortly after Global Witness wrote to members of the Hun Family to give them an opportunity to comment on the allegations contained in this report, Dy Proem's case entered Cambodia's Court of Appeals and is ongoing at the time of writing. In the five years since charges were levied against Dy Proem, however, much of the land she has been accused of unlawfully acquiring has been sold off.²⁵¹



■ **Hun Chea**, another of Hun Sen's nephews, was arrested in 2000 with six others, all sons of government officials, after shooting erupted at a Phnom Penh night club. Hun Sen was quoted as saying: "Every son, whomever's son, even my son, if they commit wrongdoing, they must be punished by the law." Four days

later, Chea was released on bail.²⁵²

Less than two years' later, in December 2001, Chea and his first cousin Hun To were arrested in connection with a shoot-out that erupted at a beer garden in Phnom Penh. Local media reported that the incident was an apparent attempted assassination of Hun To. Gunmen fired almost 50 shots at To, Chea and their party, which included relatives of Deputy Prime Minister Sar Kheng. Local police said that the shooting was the result of a 'personal dispute'.²⁵³ Hun Chea was arrested at the time and Hun Sen later also ordered the arrest of Hun To over the incident, stating that "Regardless who it is—my nephew, my child—everyone must be equal before the law." They spent less than a week in prison before being released in time to attend the wedding of their cousin, Hun Manith, to the daughter of National Police Chief Hok Lundy. The case was dropped a few weeks later, allegedly because of a lack of evidence.²⁵⁴

Chea was also reportedly involved in a hit-and-run incident in 2008 which resulted in the death of a motorbike driver. The case never went to court but witnesses alleged that they saw Chea standing at the crash site next to the vehicle in question.²⁵⁵

Chea was promoted to become a brigadier general in Cambodia's police force in 2014.²⁵⁶ He also chairs four companies in the trading and transportation sectors.²⁵⁷

In January 2016, Global Witness wrote to all the people mentioned in this chapter requesting their response to the evidence presented. Only Sok Puthyvuth replied but failed to address any of the specific allegations made against him. His email is outlined on page 20. Global Witness also wrote to the companies mentioned but only received a response from the HLH Group which is summarised on page 24.

THE HUN HEGEMONY – REINFORCING CONTROL

“Prime Minister Hun Sen is making efforts to bridge the gap between the political and private sector by cultivating mutually beneficial relationships with the country’s most prominent business tycoons. These business leaders contribute money to the ruling Cambodian People’s Party (CPP) and Hun Sen can call on them to fund charities and public works projects and to attract foreign investment, achievements for which the CPP can claim credit. In return, the business tycoons enjoy the added credibility and legitimacy of having the Prime Minister’s support. These symbiotic relationships illustrate the networks of business tycoons, political figures, and government officials that have formed in Cambodia, which reinforce the culture of impunity and limit progress on reforms such as Hun Sen’s self-declared “war on corruption.”²⁵⁸

– Extract from a cable entitled ‘Cambodia’s Top Ten Tycoons’ sent in 2007 by the US Embassy in Phnom Penh to various US government departments in Washington DC

The Hun family’s business holdings are part of a broad system of patronage which extends well-beyond the private sector into almost every aspect of Cambodian society. During Hun Sen’s three decades’ of power, this system has been maintained through a blend of nepotism, propaganda, repression and alliances with other elites.²⁵⁹

The sections below look past the private sector holdings of the family to describe some of the other key ways in which they maintain control:

PUBLIC OFFICE AND STATE SECURITY FORCES

On 10th January 2016, in a closed meeting of the CPP, Hun Sen warned officials of the dangers that nepotism poses for the Cambodian government and urged them to keep their relatives out of ministry affairs.²⁶⁰

Due to high-levels of corruption, those in public office are able to get away with handing out state jobs to their relatives and none more so than the Hun family. This reveals both their desire to consolidate power but also the deep mistrust that exists between many Cambodian elites.



MILITARY

Hun Sen’s eldest son, **Hun Manet** - often touted as the obvious successor to his father - is a Lieutenant General and holds four notable positions - deputy chairman of the Royal Cambodian Armed Forces Joint Staff, commander of the national counter-terrorism

special forces, deputy commander of the army and deputy commander of the prime minister’s bodyguard unit.²⁶¹ Hun Sen’s elite bodyguard unit, which numbers in the thousands, has long-been accused of committing brutal human rights abuses.²⁶² In March 1997, it was involved in a grenade attack on an opposition rally in which 16 people died and more than 150 were injured.²⁶³ The unit functions as Hun Sen’s private army and is central to maintaining his grip on power.²⁶⁴ In 2015, three soldiers from the unit brutally attacked two opposition lawmakers as they left parliament.²⁶⁵



Manet’s middle brother **Hun Manith** is also a Lieutenant General in the army. In 2015, he was promoted to director of the Royal Cambodian Armed Forces’ (RCAF) powerful military intelligence unit.²⁶⁶ This was described by one of Cambodia’s most respected political commentators as an attempt by the

premier to consolidate power.²⁶⁷ **Yim Leang**, Hun Many’s brother-in-law, became Cambodia’s youngest general in the air forces in 2002.²⁶⁸ In another move also described by a source as a power grab by Hun Sen, he was made head of senate president Chea Sim’s bodyguard unit until Sim died in 2015.²⁶⁹



POLICE

Hun Sen's son-in-law **Dy Vichea** is head of the National Police's Central Security Department, a powerful position which places him in charge of multiple departments including internal intelligence and the anti-terrorism department which has played a key

role in the CPP's recent clampdown on its critics.²⁷⁰ Nephew **Hun Chea** was promoted to be a one-star police general in 2014, despite numerous brushes with the law.²⁷¹



POLITICS

In politics, youngest son, **Hun Many**, is a CPP member of parliament for Kampong Speu Province.²⁷² Hun Sen's brother, **Hun Neng**, is the former governor of both Kampong Cham and Svay Rieng Provinces and now sits alongside Hun Many in Cambodia's lower house.²⁷³ Following the release of Global Witness' 2007 report "Family Trees" which exposed how relatives of Hun Sen were leading Cambodia's most powerful logging syndicate, Neng reportedly said that "If they [Global Witness] come to Cambodia, I will hit them until their heads are broken."²⁷⁴



All three of Hun Sen's sons have received scholarships or training from the US Military.

MARRIAGES TO CREATE ALLIANCES

Arranged marriages, although declining, are still common in Cambodian society, used as a means of consummating financial ties and shoring up political alliances. All five of Hun Sen's children are married to the offspring of powerful Cambodian elites, as are a number of his nieces and nephews:

- The prime minister's eldest son, **Hun Manet**, is married to Pich Chanmony, the daughter of Pich Sophoan, a prominent Cambodian People's Party member and current Secretary of State at the Ministry of Labour.²⁷⁵
- **Hun Mana**, Hun Sen's eldest daughter, is married to Dy Vichea, the son of the much feared late police chief Hok Lundy.²⁷⁶ Previously, Mana was married to Moeung Kompheak, son of Moeung Samphan, a three-star general and head of the Ministry of Defense's Department General of Logistics and Finances.²⁷⁷ Vichea was previously married to Hun Sen's niece, Hun Chantha.²⁷⁸
- **Hun Manith**, Hun Sen's middle son is married to Dy Chendavy who is Dy Vichea's sister.²⁷⁹
- Youngest son, **Hun Many**, wed the daughter of deputy prime minister Yim Chhay Ly in 2004.²⁸⁰ The wedding was reported by local media to be a lavish affair, with large numbers of military police, police officers and two fire engines on hand to ensure the 3,000 guests and their hundreds of vehicles were kept secure.²⁸¹
- Youngest daughter **Hun Maly** is married to Sok Puthyvuth, the CEO of the Soma Group and son of Sok An, who is also deputy prime minister and a long-term ally of Hun Sen's.²⁸²
- Hun Sen's niece, **Hun Kimleng**, is married to National Police Commissioner Neth Savoeun.²⁸³
- Kimleng's brother, **Hun Seang Heng** is married to Sok Sopheak who is the daughter of Sok Phal, a powerful police intelligence figure and current head of Cambodia's immigration department.²⁸⁴

These marriages are mutually beneficial and help the Hun family to maintain its control over Cambodian politics, economics and ultimately society. It's a control that the family does not expect to dissipate any time soon. Hun Sen, who is currently 63 years old and the world's seventh longest-serving leader, said in 2013 that he planned to stay in power until he is 74.²⁸⁵ It has long been presumed that he is grooming his eldest son, Hun Manet, to be his successor.²⁸⁶ However, in December 2015, Hun Many also expressed his intention to become Cambodia's next prime minister.²⁸⁷ Either way it seems that the Hun family plan to lead Cambodia for decades to come, and they continue to put in place the structures and connections to ensure they stay in power.

CHARITY ENDS AT HOME

“The CPP is now doing hundreds of thousands of projects, small and large projects, for which the budget, rather than from the national budget, comes from CPP members... When the election comes, if people don’t vote for [the CPP], we will be disheartened and will stop giving... I spend hundreds of millions of dollars paying for projects, including raising orphans, disabled children and other organizations. I don’t even use the national budget.”²⁸⁸

– Excerpts from a public speech made by Hun Sen on 5th March 2013, less than four months before the July 2013 general election which the CPP almost lost.

Members of the Hun family are also at the helm of a number of charitable organisations. As well as conferring legitimacy and an air of compassion on the family, this arrangement allows them to fundraise for humanitarian projects such as digging wells and repairing bridges and schools, ‘good works’ that can then be attributed to the ruling party.²⁸⁹

The first lady plays a particularly key role in this revolving door between charity and politics. **Bun Rany** is president of the **Cambodian Red Cross** (CRC), Cambodia’s largest charity.²⁹⁰ A member of the Red Cross’ international federation, the CRC purports to uphold the network’s core principles of neutrality and independence but does little to hide its political allegiance and has been referred to as the ‘humanitarian wing’ of the Cambodian People’s Party.²⁹¹ It functions as a microcosm of Hun Sen’s patronage system and its central committee comprises many of the Hun family’s business associates, CPP officials and their family members.²⁹²

In October 2013, following serious flooding which displaced tens of thousands of Cambodians, Rany was giving out bags of rice and other supplies paid for by CRC donors at a CRC staged event in front of hundreds of people. Addressing the crowds, and following a denunciation of the opposition party, Rany said, *“When there are floods or any other incidents, fathers and mothers and brothers and sisters have seen that there is no other party coming to help you here...there is only the CPP, because all civil servants are CPP.”²⁹³*

Between 2006 and 2009, the CRC’s income was US\$27.8 million, 71% of which (just under US\$20 million) came from domestic sources including Hun Sen and business tycoons with links to his family.²⁹⁴ Over the same time period, the CRC received a total of US\$8 million from international donors including the International Committee of the Red Cross, the International Federation of Red Cross and Red Crescent Societies, UNICEF,

UNDP and 11 other national Red Cross partners, with US\$1 million coming from the Australian Red Cross alone.²⁹⁵

Global Witness urges the International Federation of the Red Cross and Red Crescent Societies to expel the Cambodian Red Cross from its membership due to the way in which the organisation is used by the Hun family and the ruling Cambodian People’s Party for political gain.

CPP Member of Parliament and Hun Sen’s youngest son, **Hun Many**, is the president of the Union of Youth Federations of Cambodia (UYFC), one of Cambodia’s largest youth organisations.²⁹⁶ Also reportedly counting Many’s brother-in-law, Dy Vchea, as a high-ranking member, the UYFC is described by political commentators as *“a political organisation of the CPP”* and is widely viewed as its youth wing, despite the organisation’s claims to be non-partisan.²⁹⁷ In November 2015, Many was awarded the Gusi Peace Prize – which on its website claims to “approximate the honor and respect accorded to the Nobel Peace Prize of Norway, and the Pulitzer of the United States of America” – for his work in “Youth Leadership and Humanitarianism”.²⁹⁸ Hun Many returned home from Manila to be greeted by more than a thousand cheering UYFC members.²⁹⁹ A month earlier, members of the UYFC were rumoured to have been part of a large protest against opposition leader Kem Sokha outside the National Assembly where two opposition MPs were brutally beaten by members of Hun Sen’s bodyguard unit.³⁰⁰

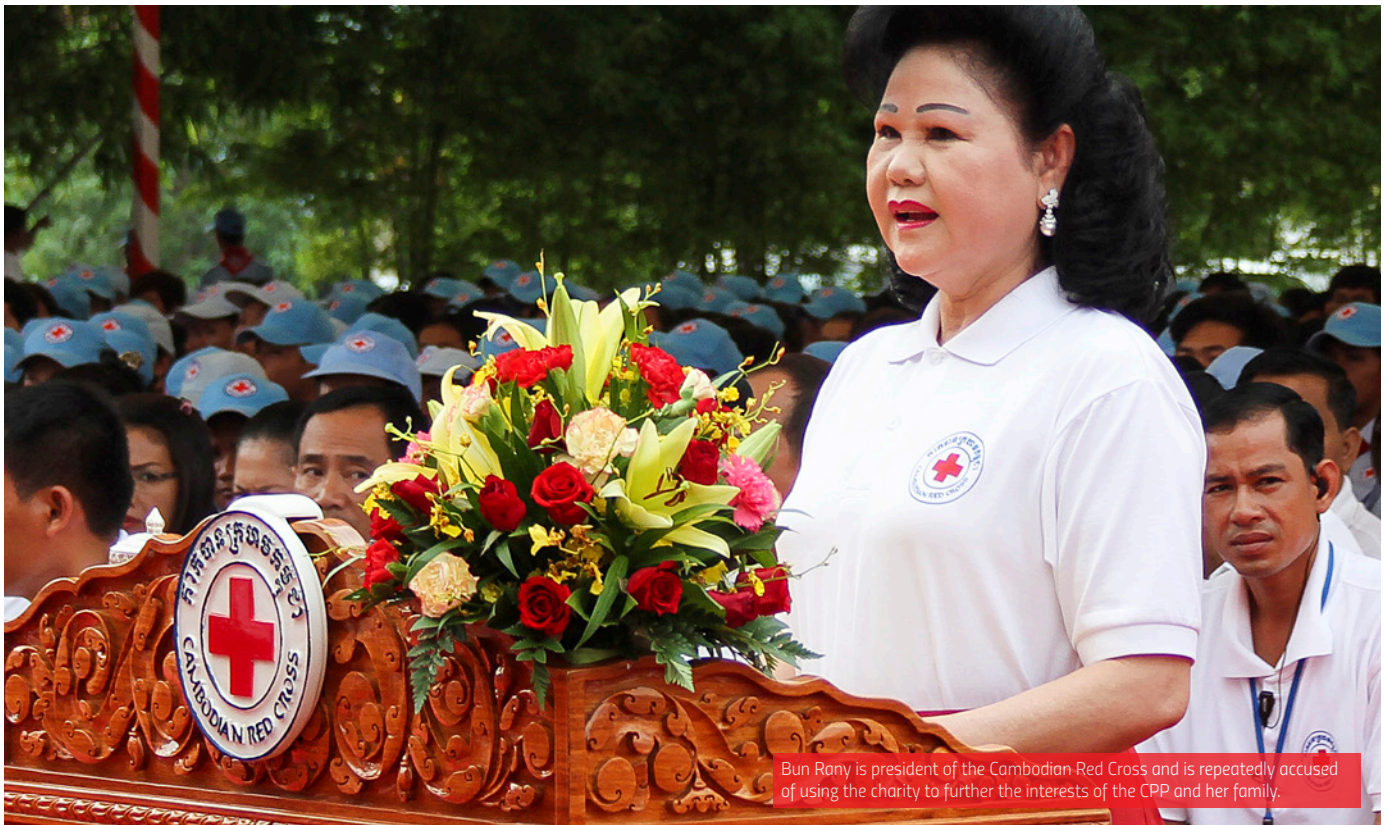
Hun Sen’s daughter-in-law, **Pich Chanmony**, also heads up her own charitable organisation called the Samdech Techo Volunteer Youth Doctor Association (TYDA) of which she is a founder, alongside her husband **Hun Manet**, and the vice chairwoman of the association’s board of directors.³⁰¹ Despite being a humanitarian aid organisation, the group is also said to be pro-CPP and shares the first two words of its name, ‘Samdech Techo’, with Hun Sen’s official title.³⁰² In August 2015, local media reported that TYDA was in talks with St. John Brigade Singapore which has also worked with the CRC in the past.³⁰³

In January 2016, Global Witness wrote to the Cambodian Red Cross, the Union of Youth Federations of Cambodia and the Samdech Techo Volunteer Youth Doctor Association but did not receive a response.

MEDIA – OFFLINE AND ONLINE

The cult of personality surrounding Hun Sen and his family also helps maintain their firm grip on Cambodian society.³⁰⁴ The premier’s photo is plastered all over the country, both on urban street corners and in rural villages, even more so than Cambodia’s king. Karaoke videos singing the praises of Hun Sen or Bun Rany air relentlessly across many Cambodian TV stations and not only laud the couple generally but also promote recent government policy decisions.³⁰⁵ Many state institutions and public spaces such as libraries, streets and schools are named after Hun Sen.³⁰⁶

Media ownership remains extremely concentrated in Cambodia and many of the country’s most influential outlets are controlled



Bun Rany is president of the Cambodian Red Cross and is repeatedly accused of using the charity to further the interests of the CPP and her family.

by business and political elites with close ties to the Hun family.³⁰⁷ As a result, freedom of speech is not fully protected and the authorities use lawsuits, criminal prosecution and violent attacks as means of intimidation against journalists.³⁰⁸

The Hun family and its associates have managed to gain a major hold over Cambodia’s private media companies, allowing them to control much of the information that Cambodians are able to access. A recent study funded by the German government and released in 2015 by the Cambodian Centre for Independent Media and Reporters without Borders surveyed 41 of Cambodia’s most significant media outlets, owned by 27 individuals. Of these 27 people, the research found that nine are business or political tycoons with strong links to the CPP. The list includes **Hun Mana**, and major private sector players and business associates of the Hun family **Kith Meng** and **Ly Yong Phat**.³⁰⁹

As described on page 13, **Hun Mana** is one of only two media moguls in Cambodia to have holdings across radio, TV and newspapers.³¹⁰ She owns Bayon Media Hight System, one of Cambodia’s key media companies, that broadcasts across both television and radio.³¹¹ One of three TV stations run by the company, BTV News is the second most popular news channel in the country and airs Cambodia’s most popular evening news programme.³¹² Mana also owns Bayon Radio which is among the most popular radio stations in Cambodia and a leading CPP mouthpiece.³¹³ In addition, she fully owns newspaper Kampuchea Thmey Daily, which has six percent of the national readership and is also widely known to be pro-CPP.³¹⁴

The dominance of private media companies by the Hun family and their cronies has profound impacts across the

entire media sector. A 2015 study by the Cambodian Centre of Independent Media found that almost half of local journalists fear repercussions as a result of their work and 17% have been attacked due to their reporting. Only 45 cent felt that the institutions they worked for were free from political influence.³¹⁵ In 2015, Reporters Without Borders identified Cambodia and India as the two deadliest countries to be a journalist covering environmental issues, citing four killings in Cambodia between 2012 and 2014.³¹⁶

With numbers of social media users in Cambodia rocketing in the last five years, the Hun family has become increasingly active online. Hun Sen has been posting regularly on his Facebook page since October 2015 and, at the time of writing, had over four million followers.³¹⁷ In March 2016, a high-profile spat erupted after local media and Sam Rainsy, exiled leader of the opposition party, accused him of buying ‘likes’ from foreign click-farms to artificially boost his popularity.³¹⁸ In order to further strengthen his online presence, in January 2016, Hun Sen launched the “Samdech Prime Minister” app which provides regular updates on his activities.³¹⁹



Hun Sen’s online presence is increasingly spilling over into the real world. Members of the Hun family have become increasingly aggressive in response to criticism levelled against them online, threatening defamation lawsuits and arresting users.³²⁰ In January 2016, following the arrest of a man that had posted a prediction of Hun Sen’s death, the prime minister warned Facebook users who insult him that they could be easily traced.³²¹

In contrast to the crackdown, Hun Sen is also using Facebook to hand out random favours to ordinary citizens. He has civil servants from seven government ministries trawling posts on his Facebook page looking for public grievances to solve.³²² In March 2016, he intervened in the case of two community members who had been arrested over a land dispute in Kampong Speu Province. He posted on Facebook that the provincial governor should work immediately for the women's release and then reportedly sent his sons - CPP lawmaker Hun Many and head of the army's intelligence unit Hun Manith - to meet the women in person as they were released from prison on bail.³²³

The way in which Hun Sen is using Facebook to both harass critics and manipulate the justice system by arbitrarily dispensing favours is typical of the way in which he has maintained control over Cambodia for the past three decades. The tools have changed, but the strategy and outcomes remain the same.

CONCLUSION

This report lays bare the extent and audacity of the myth that Hun Sen is selling to the outside world. According to the Cambodian government, the key to achieving the economic growth necessary for the country to meet its development goals is the establishment of a 'healthy private sector'.³²⁴ In an attempt to woo businesses from Asian countries and Western jurisdictions such as the US and EU, the government has recently ramped up its efforts to promote Cambodia as a great investment destination, touting the country's lack of regulation and cheap labour force.³²⁵ Despite this, Hun Sen and his government have completely failed to tackle the corruption that is rife in both the public and private sectors and which undermines all attempts to create a responsible business environment. In fact, Hun Sen and his associates are at the heart of the graft, personally benefiting from grand corruption at the expense of Cambodia's citizens.

Based almost solely on data from Cambodia's Ministry of Commerce corporate registry, the evidence presented in *Hostile Takeover* reveals that members of prime minister Hun Sen's family have links to 114 domestic companies listing share capital of over US\$200 million. These figures only include business holdings which the family has chosen to declare. Therefore their total business interests are almost certainly much larger.

The family's holdings span the majority of Cambodia's most lucrative business sectors as well those characterised by high levels of corruption, human rights abuses and environmental damage. Companies in which the family has interests have committed abuses resulting in disastrous consequences for Cambodian citizens directly impacted by their operations. More broadly, corruption and the elite capture of state resources by the Hun family and their associates is keeping ordinary

Cambodians trapped in poverty as money is siphoned away into personal bank accounts instead of being spent on vital public services such as health and education.³²⁶ Due to a politicised judiciary which remains firmly in the pocket of Hun Sen, his family members and the companies to which they are linked have been able to operate without fear of prosecution. They have managed to establish relationships with major international brands and gain interest in numerous companies which Cambodians and tourists to the country will struggle to avoid.

Having extensive private sector holdings is vital for enabling Hun Sen and his family to maintain their system of patronage. Many of these companies have been able to secure lucrative public contracts and concession licences for natural resource extraction and land. This increases the family's personal wealth which is required to continuously reward the country's elites who expect to be bestowed with 'gifts' in return for their unwavering support.³²⁷ Without this income, the Hun family's network would surely have collapsed over the past three decades.

Cambodia is currently experiencing a backwards slide in terms of democratic freedoms and openness. A look at the events of 2015 and 2016 reveal an onslaught of new repressive legislation and a harsh crackdown against all government critics including the legitimate opposition party.³²⁸ Hun Sen and his family members have become increasingly aggressive in defending their reputations and the situation looks set to deteriorate further as they seek to consolidate power ahead of elections in 2017 and 2018.

Hun Sen and his cronies certainly don't appear to be planning to relinquish power or change their ways any time soon, unless outside pressure starts to tell. In the latest election in 2013, despite allegations of systematic fraud and vote rigging by his government, Hun Sen suffered near defeat, prompting him to vow that only "*death or incapacitation to the point of being unable to work*" could unseat him.³²⁹ At the time of writing opposition leader, Sam Rainsy, is still in exile and it is unclear whether or not he'll be able to return in time for the 2018 general election.³³⁰

Recent events, coupled with the findings laid out in *Hostile Takeover* should act as major warning sign for potential investors. As the rule of law diminishes, investors are left vulnerable to arbitrary decision-making by elites. In addition, the opaque business environment with high-levels of corruption poses major legal, financial and reputational risks for companies. They face potentially becoming embroiled in driving human rights abuses, environmental destruction and corruption. To avoid this, investors must conduct thorough checks to ensure that they're not getting into bed with the country's corrupt elites. Otherwise, the 'healthy private sector' that the government claims it is working towards will never materialise and ordinary Cambodians will continue to pay the price.

RECOMMENDATIONS

Companies and investors should:

These recommendations relate to all companies and investors with links to members of the Hun family and their associates. This is regardless of whether the links are via formal partnerships, franchising, through supply chains, exclusive distribution deals or even loose client relationships.

1. Conduct stringent due diligence to ascertain who is involved in the investment. Where there is the involvement of business or political elites with a history of corruption allegations, or their family members, do not proceed with the investment. Where this relates to an existing investment, then exit the business relationship as soon as possible or within a maximum of 12 months.

If evidence of involvement in corruption is uncovered through the due diligence process then companies and investors should self-report the findings to all relevant authorities that have legal jurisdiction.

2. Apply the Financial Action Task Force's definition of Politically Exposed Persons (PEPs) which also applies to all family members and associates of those identified. Create stringent processes to identify PEPs. Where a potential business partner is identified to be a PEP then enhanced due diligence systems must be put in place to ensure that the person in question is not involved in money laundering or other corrupt practices.
3. Ensure through a stringent due diligence process that business activities and investments in Cambodia are not violating domestic or international anti-corruption legislation or conventions. Give particular consideration to ensuring compliance with the 1977 US Foreign Corrupt Practices Act which covers any transaction conducted in US dollars and therefore all non-local business transactions that take place in Cambodia.

International governments providing Cambodia with financial aid and other types of assistance:

4. Use the Cambodian Development Cooperation Forum (CDCF) as the basis upon which to negotiate with the Cambodian government for the implementation of the recommendations made in this report. Ensure through these negotiations that all donor money to Cambodia is managed transparently, does not end up in the pockets of elites, and is spent in a way which benefits the citizens of Cambodia.
5. Warn home country investors about the high-risk of becoming embroiled in corruption when investing in Cambodia. Advise them to conduct stringent due diligence to ensure that they are not entering commercial relationships with business or political elites with a history of corruption allegations or their family members. Advise them that certain sectors, such as natural resource extraction, are particularly high-risk and therefore should be avoided.

6. Ensure that the fulfilment of human rights obligations as well as transparency requirements are incorporated into all future investment treaties of which Cambodia is a signatory. In particular, ensure that these obligations are included in the Bilateral Investment Treaty currently being negotiated between Cambodia and the US.

7. Publicly oppose recently passed regressive laws – LANGO, Telecommunications and Trade Union Laws – from being implemented in an arbitrary way that targets government critics and the introduction of additional regressive laws such as the State Secrets Law. Support the process to devise the Freedom of Information Law to ensure it increases transparency around government decision-making.

The Royal Government of Cambodia should:

8. Conduct thorough, independent and transparent investigations into the allegations made in this report and prosecute those individuals and companies found to be breaking Cambodian law. In particular, conduct a thorough and transparent investigation into Prime Minister Hun Sen, and the members of his family named in this report, for the crimes of illicit enrichment and the granting and receiving of unfair advantages over the allocation of state resources.
9. Ensure that the Ministry of Commerce restores its full corporate registry in which all information submitted by companies is included. Remove the need to register an email address and login when searching the Ministry of Commerce's corporate registry and ensure it is both publicly accessible and fully searchable. Correct all data inputted into the registry – particularly the names of individuals, companies and streets - to increase the registry's usability.
10. Reform the Anti-Corruption Law so that it is fit for purpose. In particular;
 - Amend Article 11 so that the chair and vice-chair of the Anti-Corruption Unit are selected through an independent and transparent process and are no longer appointed by the prime minister.
 - Amend Article 16 so that the Anti-Corruption Unit's operations budget is no longer part of the budget package of the Office of the Council of Ministers.
 - In order to avoid a conflict of interest, amend Article 16 so that the Anti-Corruption Unit no longer has the right to receive donations or assistance from national organisations.
 - Based upon the Financial Action Task Force standards, extend Article 17 so that the family members and close associates of public officials are also required to declare their assets.
 - Amend Article 20 so that asset declaration is conducted publicly and Cambodian citizens are able to access the information.

11. Ensure that the Access to Information Law currently being drafted increases transparency around government decision-making and is not undermined by the upcoming State Secrets Law.
12. Remove Prime Minister Hun Sen as the chair of the Council for the Development of Cambodia (CDC) and replace him with an independent chair without links to the CPP or the Hun family.
13. End secrecy and improve accountability around natural resource governance including;
 - Disclosing all relevant documentation relating to the extraction of natural resources including mining, Economic Land Concessions and sand dredging.
 - Reinstating the Ministry of Agriculture, Forestry and Fisheries' online database of Economic Land Concessions. Expand the original database to cover Social Land Concessions.
 - Creating independent oversight and monitoring processes for natural resource allocation and management including opportunities for oversight from both the legislature and civil society including affected communities.
14. End the persecution of all government critics including;
 - Members and supporters of the opposition party.
 - Online critics
 - Human rights defenders
 - Land and forest defenders

In particular, put an end to the misuse of the Anti-Corruption Unit as a political tool to attack and intimidate civil society. Release those currently being detained and drop all charges against them.

Members of the Hun family, including Prime Minister Hun Sen, should:
15. Make full public declarations of their assets including all existing connections to domestic and international companies, whether those connections are formal or informal.
16. Refrain from abusing their power to pressure private Cambodian companies to grant them shareholdings.



ANNEXES

ANNEX 1 - OUR FINDINGS IN FULL

The table below lists 114 private domestic companies that are affiliated to members of the Hun family. Almost all of this information is taken from the Ministry of Commerce corporate registry, but in a handful of cases has been supplemented by other sources of government information and media reports.

Hun family member	Company*	Relationship to company/type of affiliation*	Record on Cambodia Corporates or alternative source of information	Company capital at registration in USD*	Sector*
	<i>* Companies highlighted in red appear more than once in the table as they are affiliated to more than one member of the Hun family</i>	<i>* Where the size of the shareholding is not stated it means that the information was unavailable</i>		<i>* The majority of these figures can be found by downloading the raw data spreadsheets of company registrations from Cambodia Corporates</i>	<i>* This is based on the best information available including the MoC data set, external information such as corporate websites and, in some cases, the name of the company. For full references contact Global Witness</i>
Dy Chouch	Pich Sambath Import Export Co.	Chair	R2425	5,000.00	Trading
Dy Chouch	C Pimex Co.	Chair; Director; Shareholder	A1319	5,000.00	Trading
Dy Vichea	Dy Corp	Chair	R15979	5,000.00	Unknown
Dy Vichea	Emperor Group	Chair	R12380	5,000.00	Conglomerate - Financial services, construction/real estate, watch and jewellery, hospitality/entertainment, media, furniture and furnishing, as well as food and beverage
Dy Vichea	VC Group	Chair	R16097	1,000.00	Mining
Dy Vichea	Poseidon Co Ltd (listed as 'Poseldon' by the MoC)	Director; Shareholder	A4879	Unknown	Gambling
Dy/Hok Chendavy	D & M (Bavet) SEZ Co	Developer	Official Cambodian government data collated and displayed on the Open Development Mekong website, https://cambodia.opendevelopmentmekong.net/profiles/special-economic-zones/?map_id=6 (last accessed 1st June 2016)	52,000,000.00	Special Economic Zone
Hun Chantha	Fortress Group	Chair	R18381	8,000,000.00	Unknown
Hun Chantha	Fortress Travel Agency	Chair	R18380	8,000,000.00	Tourism
Hun Chantha	Fortress Construction Co	Chair	R5424	2,000,000.00	Construction/real estate
Hun Chantha	Fortress Investment Company International	Chair	R16272	8,000,000.00	Finance
Hun Chantha	Advance Development Group (ADG) Co	Chair	R16024	5,000.00	Trading
Hun Chantha	SPK 1	Chair	R25317	1,000.00	Unknown
Hun Chantha	SPK Group	Chair	R3559	5,000.00	Unknown
Hun Chantha	SID Cambodian Co	Chair	R232	1,000,000.00	Unknown
Hun Chantha	Cambodian Top Investment (CTI)	Chair	R15642	200,000.00	Finance
Hun Chantha	Gold 999 99	Chair	R19191	175,000.00	Unknown
Hun Chantha	Tourism (Cambodia) Co.	Chair	R15530	6,000.00	Tourism
Hun Chantha	(Cambodian) International Franchise Co.	Director; Shareholder (through Fortress Investment Company International)	A5727	5,000.00	Trading
Hun Chanthou	Heritage Investment Corporation Co.	Chair	R18390	500,000.00	Finance
Hun Chea	Hun Chea Transport Co.	Chair	R4509	5,000.00	Transport
Hun Chea	CHSN Transportation Co.	Chair	R3133	5,000.00	Transport
Hun Chea	CHLK Trading Co.	Chair	R2146	5,000.00	Trading
Hun Chea	(Cambodian) HC Trading Co.	Chair	R1002	5,000.00	Trading
Hun Chea	PSZ Trading	Director; Shareholder (10%)	A5147	5,000.00	Trading
Hun Kimleng	HML Xat Consulting	Chair	R25296	100,000.00	Professional services (tax advisors)
Hun Kimleng	Eastern (Cambodia) International Investment	Chair; Shareholder (49%)	A799	5,000,000.00	Trading
Hun Kimleng	F & B Life Style Investment	Chair	R18498	5,000.00	Unknown
Hun Kimleng	Gloria Jean's Coffees (Cambodia)	Chair	R18902	5,000.00	Hospitality/entertainment
Hun Kimleng	HD Rock Café & Shop	Chair; Director; Shareholder (75%)	R8322; A9983; A9875	5,000.00	Hospitality/entertainment
Hun Kimleng	HKLCH Import Export	Chair	R23359	10,000,000.00	Trading
Hun Kimleng	HML Consulting	Chair	R25187	100,000.00	Professional services - Legal

Hun family member	Company*	Relationship to company/type of affiliation*	Record on Cambodia Corporates or alternative source of information	Company capital at registration in USD*	Sector*
	<i>*Companies highlighted in red appear more than once in the table as they are affiliated to more than one member of the Hun family</i>	<i>*Where the size of the shareholding is not stated it means that the information was unavailable</i>		<i>*The majority of these figures can be found by downloading the raw data spreadsheets of company registrations from Cambodia Corporates</i>	<i>*This is based on the best information available including the MoC data set, external information such as corporate websites and, in some cases, the name of the company. For full references contact Global Witness</i>
Hun Kimleng	Worldwide Investment Group	Chair; Director; Shareholder	A5952	25,000.00	Conglomerate - Food & beverages, advisory services, tourism, construction/real estate, mining, trading, hospitality/entertainment
Hun Kimleng	Worldwide Investment Incorporation	Chair; Shareholder (100%)	A5415	25,000.00	Conglomerate - Food & beverages, advisory services, tourism, construction/real estate, mining, trading, hospitality/entertainment
Hun Kimleng	Kam Chin International Cooperation Group	Shareholder (51%)	A6710	Unknown	Forestry
Hun Maly	TK Avenue	Chair	R25949	1,500.00	Retail
Hun Maly	Cambodia Electricity Private	Director; Shareholder (5%)	A6979; A7920; Electric Authority of Cambodia, Decision on first revision of the license document no.132LD dated May 31 , 2006 for (Cambodia) Electricity Private Co., Ltd. for providing electric power generation service at Phnom Penh city for revising ownership of licensee, 27th November 2013. Document obtained by Global Witness investigators in October 2015.	Unknown	Energy
Hun Maly	(Cambodian) Food Industries Co	Director; Shareholder	A6257	Unknown	Unknown
Hun Maly	Decampharma	Shareholder (10%)	A7567; A10029	50,000.00	Pharmaceuticals
Hun Maly	Moon Media (listed as Moon Advertising by the MoC)	Shareholder; Director	A651	5,000.00	Media
Hun Maly	Stone Grill	Shareholder	A7307	5,000.00	Hospitality/entertainment
Hun Mana	NVC Corporation	Chair; Director; Shareholder (via NH Holding)	A5839	Unknown	Manufacturing
Hun Mana	Ocasis Cambo Investment Group Co	Chair	R7623	10,000.00	Unknown
Hun Mana	Ocasis Cambo Investment Co	Chair	R7622	10,000.00	Unknown
Hun Mana	Star Aviation (Cambodia)	Chair	R18119	5,000.00	Transport
Hun Mana	Star Airline (Cambodia)	Chair	R18113	5,000.00	Transport
Hun Mana	Helistar (Cambodia)	Chair	R18118	5,000.00	Transport
Hun Mana	Moon Media (listed as Moon Advertising by the MoC)	Chair; Director; Shareholder (51% via NH Holding)	A311; A651	5,000.00 (figure only counted once in total despite repetition of company in table)	Media
Hun Mana	Bayon Media Hight System Co	Chair; Director; Shareholder (100%)	A7110	Unknown	Media
Hun Mana	Bayon CM Organizer Co	Chair; Shareholder (25% via Bayon Media Hight System Co)	R22109; A4765	5,000.00	Media
Hun Mana	Jaya Holding Ltd	Chair	R15680	222,000.00	Unknown
Hun Mana	Dragon Royal Telecom	Chair; Director	A4764	2,000,000.00	Telecomms
Hun Mana	Kampuchea Thmey Daily Co	Chair; Director; Shareholder (100%)	R6193; A473	5,000.00	Media
Hun Mana	NVN Corporation Co	Chair	R1850	500,000.00	Construction/real estate
Hun Mana	MLM Resort Group Co	Chair	R3836	5,000.00	Tourism
Hun Mana	K Thong Huot Telecom	Director; Shareholder (20%)	A6195	Unknown	Retail
Hun Mana	NH Holding	Representative	A311; A5839; A2534	Unknown	Finance
Hun Mana	Viettel (Cambodia) PTE	Shareholder (6% via NH Holding)	A2588	44,877,168.00	Telecomms
Hun Mana	Royal Group Investment Company	Director; Shareholder	A4610	5,000.00	Finance
Hun Mana	The Museum Company	Shareholder	A4617	2,500,000.00	Tourism
Hun Mana	Vina (HK)	Shareholder	A5068	16,000,000.00	Gambling
Hun Mana	Cambodia Electricity Private	Director; Shareholder (10%)	A6979; A7920; Electric Authority of Cambodia, Decision on first revision of the license document no.132LD dated May 31 , 2006 for (Cambodia) Electricity Private Co., Ltd. for providing electric power generation service at Phnom Penh city for revising ownership of licensee, 27th November 2013. Document obtained by Global Witness investigators in October 2015.	Unknown	Energy

Hun family member	Company*	Relationship to company/type of affiliation*	Record on Cambodia Corporates or alternative source of information	Company capital at registration in USD*	Sector*
	<i>* Companies highlighted in red appear more than once in the table as they are affiliated to more than one member of the Hun family</i>	<i>* Where the size of the shareholding is not stated it means that the information was unavailable</i>		<i>* The majority of these figures can be found by downloading the raw data spreadsheets of company registrations from Cambodia Corporates</i>	<i>* This is based on the best information available including the MoC data set, external information such as corporate websites and, in some cases, the name of the company. For full references contact Global Witness</i>
Hun Mana	Orkide Villa 3	Chair	R32257	500,000.00	Construction/real estate
Hun Manith	Cambodia Electricity Private	Director, Shareholder (5%)	A6979; A7920; Electric Authority of Cambodia, Decision on first revision of the license document no.132LD dated May 31, 2006 for (Cambodia) Electricity Private Co., Ltd. for providing electric power generation service at Phnom Penh city for revising ownership of licensee, 27th November 2013. Document obtained by Global Witness investigators in October 2015.	Unknown	Energy
Hun Seng Ny	D.G.F. (Cambodia) Co.	Chair	R3035	1,000,000.00	Unknown
Hun Seng Ny	Garuda Import Export (Garuda Group)	Chair	R22816	5,000.00	Trading
Hun Seng Ny	Hatti Marketing Co	Chair	R21768	5,000.00	Media
Hun Seng Ny	Hovercraft HiTec (Cambodia) Co	Chair	R21662	5,000.00	Unknown
Hun Seng Ny	Metal Mining (Cambodia) Co	Chair	R16769; A5955	7,500.00	Mining
Hun Seng Ny	Metal Mining (Cambodia) PLC	Chair; Shareholder	A8006	Unknown	Mining
Hun Seng Ny	Rong De Group	Chair; Director; Shareholder	A1816	5,000.00	Unknown
Hun Seng Ny	UNT Wholesale Co	Chair; Director; Shareholder (50%)	A5841; A5545	Unknown	Trading
Hun Seng Ny	Attwood Investment Group	Shareholder (50%)	A4769	1,000,000.00	Trading
Hun Seng Ny	SL Garments	Director General	Cambodia Daily, Hun Sen's sister linked to private security firm at SL factory, 14th November 2013, https://www.cambodiadaily.com/archives/hun-sens-sister-linked-to-private-security-firm-at-sl-factory-46946/ (last accessed 4th June 2016)	Unknown	Garments
Hun Seng Ny	HLH Agriculture	Unknown	Cambodia Daily, Hun Sen's sister tied to company in Boeung Kak land sale, 25th June 2014, https://www.cambodiadaily.com/archives/hun-sens-sister-tied-to-company-in-boeung-kak-land-sale-62344/ (last accessed 3rd June 2016); Phnom Pneh Post, Court summons Omlaing trio, 19th July 2010, http://www.phnompenhpost.com/national/court-summons-omlaing-trio (last accessed 3rd June 2016); Phnom Penh Post Petition delivered: Villagers demand land be returned, 11th November 2014, http://www.phnompenhpost.com/national/petition-delivered-villagers-demand-land-be-returned/ (last accessed 3rd June 2016); Phnom Penh Post, Chainsaws stayed busy in past year, 26th December 2013, http://www.phnompenhpost.com/national/chainsaws-stayed-busy-past-year (last accessed 3rd June 2016)	Unknown	Agriculture
Hun Seng Ny	Garuda Security Services (Garuda Group)	Unknown	R22816; Cambodia Daily, Hun Sen's sister linked to private security firm at SL factory, 14th November 2013, https://www.cambodiadaily.com/archives/hun-sens-sister-linked-to-private-security-firm-at-sl-factory-46946/ (last accessed 4th June 2016)	Unknown	Security
Hun To	HTK Co	Chair	R14878	5,000.00	Unknown
Hun To	HTTK Co.	Chair	R25100	5,000.00	Unknown
Hun To	Gold Quest	Chair	R3066	175,000.00	Retail
Hun To	LHR Asean Import Export Co	Chair; Director; Shareholder	A6749	5,000.00	Energy
Hun To	LHR Asean Investment Co	Director; Agent	R20011	5,000.00	Energy
Leang Vouch Chheng	NLC Import Export	Chair	R20441	5,000.00	Trading
Leang Vouch Chheng	Pacifica Investment Co. (listed as Ppacific Investment Co. by the MoC)	Chair	R12435	10,000,000.00	Finance

Hun family member	Company*	Relationship to company/type of affiliation*	Record on Cambodia Corporates or alternative source of information	Company capital at registration in USD*	Sector*
Men Pheakdey	D & M (Bavet) SEZ Co	Chair; Director; Shareholder (60%); Developer	A939; Official Cambodian government data collated and displayed on the Open Development Mekong website, https://cambodia.opendevdevelopmentmekong.net/profiles/special-economic-zones/?map_id=6 (last accessed 1st June 2016)	52,000,000.00 (figure only counted once in total despite repetition of company in table)	Special Economic Zone
Men Pheakdey	CVI Resorts	Chair; Shareholder (30%)	A5205	5,000.00	Tourism
Men Pheakdey	CVI Land	Shareholder	A5070	5,000.00	Unknown
Men Pheakdey	Cambodia Electricity Private	Director; Shareholder (10%)	A6979; A7920; Electric Authority of Cambodia, Decision on first revision of the license document no.132LD dated May 31, 2006 for (Cambodia) Electricity Private Co., Ltd. for providing electric power generation service at Phnom Penh city for revising ownership of licensee, 27th November 2013. Document obtained by Global Witness investigators in October 2015.	Unknown	Energy
Pich Chanmony	G Gear Co	Chair	R5729	200,000.00	Retail
Pich Chanmony	Khmer Latex Co	Chair; Director; Shareholder (100%)	A8441	Unknown	Manufacturing
Pich Chanmony	CMN Star Investment	Chair	R7682	5,000.00	Finance
Pich Chanmony	Lady Cosmetic International Corporation	Chair	R19133	5,000.00	Retail
Pich Chanmony	Zenoteq Solutions Co	Chair	R4574	50,000.00	Unknown
Pich Chanmony	Legend Cinema Co	Chair	R7606	5,000.00	Hospitality/entertainment
Pich Chanmony	PMV Entertainment Co	Chair	R5734	100,000.00	Hospitality/entertainment
Pich Chanmony	Brands Management Ltd	Director; Shareholder (5%)	A8001	20,000.00	Hospitality/entertainment
Seng Keang	Rith Mony Samnang Leap Co	Chair	R2728	5,000.00	Agriculture
Seng Keang	Seng Kheang Apivath Co	Chair	R15426	5,000.00	Unknown
Seng Keang	Grand Harvest International (GHI)	Chair	R20726	5,000.00	Garments
Sok Puthyvuth	Soma Group	CEO	Soma Group company website, http://www.somagroup.com.kh/index.php/about-soma/our-teams/ (last accessed 2nd June 2016)	Unknown	Conglomerate: Trading, agriculture, energy, education, construction/real estate
Sok Puthyvuth	Soma Energy	Chair; Shareholder (100%)	R3327; A7766	10,000,000.00	Energy
Sok Puthyvuth	Soma Ever Green	Chair	R1435	5,000.00	Agriculture
Sok Puthyvuth	Soma Kova Holding	Chair	R13625	5,000.00	Trading
Sok Puthyvuth	Tela E&P	Chair	R18807	12,500.00	Energy
Sok Puthyvuth	Soma Construction & Development	Chair	R25207	5,000,000.00	Construction/real estate
Sok Puthyvuth	Phnom Penh Boat Ride Co	Chair	R24522	2,000,000.00	Tourism
Sok Sopheak	iOne Co	Chair; Director; Shareholder	R18674; A365; A2212	500,000.00	Retail
Sok Sopheak	Cemtes (Cambodia) PTE	Chair	R12909	5,000.00	Retail
Sok Sopheak	Mtsh Gadgets Co	Chair	R7834	100,000.00	Retail

Hun family member	Company*	Relationship to company/type of affiliation*	Record on Cambodia Corporates or alternative source of information	Company capital at registration in USD*	Sector*
	<i>* Companies highlighted in red appear more than once in the table as they are affiliated to more than one member of the Hun family</i>	<i>* Where the size of the shareholding is not stated it means that the information was unavailable</i>		<i>* The majority of these figures can be found by downloading the raw data spreadsheets of company registrations from Cambodia Corporates</i>	<i>* This is based on the best information available including the MoC data set, external information such as corporate websites and, in some cases, the name of the company. For full references contact Global Witness</i>
Sok Sopheak	AFZ Co	Chair; Director; Shareholder (shareholding transferred from Sok Sopheak to 'SEM TES (CAMBODIA) PTE LTD Represented by Mrs. Sok Sophak' in 2009. Shareholding of 'SEM TES (CAMBODIA) PTE LTD' then transferred 'I ONE represented by Mrs. Sok Sopheak' in 2010)	R20697; A5956; A73; A1891	5,000.00	Unknown
Sok Sopheak	Security Services Asia	Chair	R12220	5,000.00	Security
Thai Jackie Tai Hien	Camcorp Capital Group	Chair	R8719	1,000,000.00	Hospitality/entertainment
Thai Jackie Tai Hien	Camcorp Capital Investment Group	Chair	R7499	3,000,000.00	Finance
Thai Jackie Tai Hien	Camcorp Capital Investment Ltd	Chair	R7574	3,000,000.00	Finance
Yim Chhay Lin	Decampharma	Chair; Shareholder (20%)	R6884; A7567; A10029	<i>50,000.00 (figure only counted once in total despite repetition of company in table)</i>	Pharmaceuticals
Yim Chhay Lin	YLL Resorts Co	Chair	R11849	5,000.00	Tourism
Yim Chhay Lin	Machhoem Bopea Trading Group Co	Chair	R17887	5,000.00	Trading
Yim Chhay Lin	Phu Yang Ltd	Shareholder	A1570	5,000.00	Mining
Yim Chhay Lin	Paradis Ltd	Shareholder	A5590	Unknown	Unknown
Yim Chhay Lin	Sovannaphum Mine Exploration & Development Co	Director; Shareholder (50%)	A1214	10,000.00	Mining
Yim Leang	Khun Sea Import Export Co	Shareholder (10%)	A1009; A2247	2,000,000.00	Agriculture; Construction/real estate; Trading
TOTAL:				201,223,668.00	

ANNEX 2 - METHODOLOGY

Global Witness was able to obtain original company registration documents and subsequent amendments for almost 23,000 companies registered in Cambodia.³³¹ This constitutes all of the company records that were contained in the Ministry of Commerce's online corporate registry in February 2016.

In April 2015, the Ministry of Commerce upgraded its corporate registry but the new version suffers severe search limitations and is missing information that was included on the previous version, namely the nationality of company chairs. In addition, it presents a major security risk as the connection to the database is not encrypted plus users must now register and login to the site, allowing the government to monitor who's using it and what searches are being conducted.³³² In an increasingly repressive environment this is simply too big a risk for many civil society actors, journalists and ordinary citizens to take.

Global Witness has used the Ministry of Commerce dataset – which totals 22,808 company registration entries, and 7,502 amendments - to identify the business holdings of members of the Hun family as well as their private sector links to some of Cambodia's top business tycoons. Investigators searched for company registration documents and amendments that listed the people in question as chairpersons, directors, shareholders representatives or agents. Registered addresses of companies and company chairpersons were also checked in order to identify hidden links. Results from these searches were then cross-checked against other sources of information including additional desk-based research and face-to-face interviews.

In order to increase transparency and corporate accountability in Cambodia, Global Witness is launching Cambodia Corporates alongside this briefing. This fully searchable and publicly accessible database includes the entire dataset upon which this investigation is based. If you're an investigator wanting to know more about who owns a particular company, or an investor wanting to make sure you know who you're getting into bed with, then visit: www.cambodiaincorporates.globalwitness.org

ANNEX 3 - THE LEGAL FRAMEWORK

As outlined in the main report, members of the Hun family and companies linked to them have broken various laws in the course of their operations, most notably in the natural resource sector. However, in addition, the family's accumulation of business holdings, and the role this plays in the broader system of patronage which allows the Hun family to maintain control over Cambodian society, does violate national laws in and of itself.

This section describes some of the provisions in Cambodia's legal framework aimed at stopping corruption and the inherent weaknesses in those laws which allow the Hun family and their associates to ignore them.

THE ANTI-CORRUPTION UNIT

In 2010, Cambodia passed its first Anti-Corruption Law.³³³ The Law established the Anti-Corruption Unit (ACU) which was tasked with driving the country's efforts to end all forms of graft including:

- Implementing all laws and regulations related to corruption.
- Directing the work of preventing and combating corruption.
- Receiving and investigating complaints of corruption and taking action against perpetrators.³³⁴

However, despite Article 11 of the Anti-Corruption Law stating that the ACU will “*independently undertake its duties*”, the institution remains firmly under the control of Hun Sen.³³⁵ He appoints the body's chairman and vice-chairman and its operations budget is part of the budget package of the Office of the Council of Ministers (Cambodia's cabinet) which is controlled by the prime minister.³³⁶ The law also grants the ACU the right to receive donations from national and international organisations, leaving the door open for companies and cronies to buy their way out of corruption charges.³³⁷

As a result, the ACU is widely considered to be little help in the fight against corruption and, since its creation, corruption levels remain high.³³⁸ In April 2016, the ACU sunk to a new low when it summoned and interrogated seven human rights workers the authorities accused of attempting to bribe the mistress of the deputy opposition leader to deny their extramarital affair. The move was heavily criticised by international and Cambodian human rights organisations as an outrageous misuse of the ACU as a political tool to attack and intimidate civil society.³³⁹

ASSET DECLARATION

The Anti-Corruption Unit (ACU) is responsible for managing the system of asset declaration, a key tool in any fight against corruption.³⁴⁰ Articles 17 and 18 of the Anti-Corruption Law requires politicians, civil servants, police, and military and civil society leaders to declare their assets every two years.³⁴¹

At least four members of the Hun family – Hun Manith, Yim Leang, Dy Vichea and Hun Chea - hold public office and have business holdings which, by law, should be declared.³⁴² However, declarations are not conducted publicly and the information on the business holdings of those required to participate is only made available to the ACU.³⁴³ Article 38 of the Anti-Corruption Law lays out the punishment for failing to declare assets as just 1 month to a year in prison and a fine of one hundred thousand Riel (US\$25) to two million Riel (US\$500).³⁴⁴ However as the process happens behind closed doors, it is impossible to know if members of the Hun family are failing to declare any of their personal assets.

Another major weakness of the asset declaration process outlined in the Anti-Corruption Law is that it does not require family members of those required to declare their assets to do

the same.³⁴⁵ Therefore, members of the Hun family that do not hold public office are under no obligation to reveal to the public their private sector holdings. This enables them to operate under the radar.

ILLICIT ENRICHMENT

Article 36 of the Anti-Corruption Law categorises ‘illicit enrichment’ as a crime. The law defines it as “*an increase in the wealth of an individual and the individual cannot provide reasonable explanation of its increase in comparison to his or her legal income.*” It states that assets belonging to persons who cannot explain their wealth should be confiscated and become state property.³⁴⁶

Hun Sen certainly appears to be in contravention of this law and therefore acting illegally. He has claimed that he survives solely on his government salary which, according to a statement he made to local reporters, was 4.6 million Riel (US\$1,150) per month in 2011.³⁴⁷ However, his lavish lifestyle including assets such as luxury houses appears to discount this possibility.

Further disproving his claim, in June 2012, amid widespread protests against rampant land grabbing, the prime minister launched a new land titling scheme. He sent 1,600 student volunteers out into the countryside to demarcate and allocate private titles to villagers all over Cambodia. He boasted that he was paying the student volunteers a monthly salary of around US\$220 out of his own pocket.³⁴⁸ If all volunteers were active at any one time this would cost the prime minister US\$352,000 per month, more than 300 times his official monthly salary. In another example, in 2013, Hun Sen reportedly boasted in a public speech “*I spend hundreds of millions of dollars paying for projects, including raising orphans, disabled children and other organisations. I don’t even use the national budget.*”³⁴⁹

Despite this evidence however, the verdict as to whether a person is guilty of illicit enrichment is based solely on the information provided through asset declaration to the Anti-Corruption Unit (ACU).³⁵⁰ As this is done in private, and Hun Sen has de facto control of the ACU, there is slim chance of him or his family members being prosecuted for the crime of illicit enrichment or any other corruption-related offence.

CAMBODIA’S CRIMINAL CODE

There are a number of corruption-related offences included in Cambodia’s Criminal Code which are also referenced in Article 32 of the Anti-Corruption Law.³⁵¹ The evidence laid out in this report and backed up by two decades of media exposés and reports from Global Witness and other NGOs, makes a strong case that Hun Sen has broken Cambodian law by contravening Articles 595 and 599 which state the following:

■ Article 595: Definition of Influential Deal³⁵²

Passive influential deal is an act committed by a civil servant or a citizen entrusted with public mandates through an election to directly or indirectly solicit or accept without authorization the donation, gift, promise, or any interest in order to obtain from a State institution due to real or assumed influence a job, a contract, an insignia or other preferences.

■ Article 599: Definition of Favouritism³⁵³

Favouritism is an act committed by a civil servant or a citizen entrusted with public mandates through an election to unlawfully give advantages to other persons while making public contract.

Examples of where members of the Hun family would appear to have violated these laws are littered throughout this report and are also listed on pages 21-22.

POLITICALLY EXPOSED PERSONS (PEPs)

All Hun family members should be considered ‘politically exposed persons’ (PEPs), either due to their relationship to Hun Sen or, in many cases, as a result of the fact that they themselves hold public office or top positions within state security forces.

PEPs are defined by the inter-governmental Financial Action Task Force (FATF) as “*individuals who are or have been entrusted domestically with prominent public functions, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials.*”³⁵⁴ Financial institutions are required by the FATF to ‘reasonable measures’ to identify PEPs. Where a potential customer or business partner is identified to be a PEP then enhanced due diligence systems must be put in place to ensure that the person in question is not involved in money laundering or other corrupt practices. FATF is clear that these requirements should also apply to family members or close associates of PEPs.³⁵⁵

Cambodia’s 2007 Anti-Money Laundering Law does require reporting entities to pay special attention to business relations and transactions with PEPs and “*seek additional information as to the origin and destination of the money, the purpose of the transaction and the identity of the transacting parties.*”³⁵⁶ However, Cambodia’s definition of PEPs only encompasses individuals who are or have been entrusted with prominent public function in a foreign country. Neither individuals entrusted with prominent public function in Cambodia nor their family members and close associates are included.³⁵⁷ According to this definition therefore, not one member of the Hun family would be considered a PEP. As a result, in Cambodia’s most recent FATF mutual evaluation, which was carried out by the World Bank in 2007, the country is ranked as Non-Compliant in terms of meeting FATF’s recommendations on PEPs.³⁵⁸

Global Witness urges the Cambodian government to amend the definition of Politically Exposed persons (PEPs) to include (i) domestic persons and (ii) PEPs' family members and close associates.

The problem with PEPs does extend further than just Cambodia. There is no global comprehensive database of PEPs and investors must instead rely on disparate lists put together by various governments, multilateral institutions and risk management firms. There have been attempts to consolidate this information online. In May 2016, Global Witness conducted searches on one such website which collated information on PEPs from a range of sources including CIA World Leaders, the European External Action Service Consolidated Lists, the UN Security Council's Consolidated List and the World Bank's Debarred suppliers for procurement. The only members of the Hun family to be listed were Hun Sen himself and his brother Hun Neng who is a CPP lawmaker. Not one of the other family members listed in this report were named as a PEP, including Hun Sen's three sons, two of which hold top posts in the military and the third who is a parliamentarian.³⁵⁹

MILITARY PERSONNEL

Members of the of the Hun family who hold positions in the military and have private sector holdings may well have contravened Article 25 of the 1998 General Statute of Military Personnel of the Royal Cambodian Armed Forces which, in an attempt to combat abuse of power, prohibits the following:

- Us[ing] influence and power of their own functions to exploit any advantage...
- Conduct[ing] any business which may harm the honour and dignity of the Royal Cambodian Armed Forces.
- Join[ing] as members of the board of directors or to manage companies privately.³⁶⁰

Under this statute, Hun Manith's directorship of Cambodia Electricity private is illegal.³⁶¹ Yim Leang's 10 per cent shareholding in agriculture and real estate company Khun Sea Import Export also points to illegal behaviour.³⁶² Although Leang is not a director, when asked by local reporters about a land dispute between the company and a group of Phnom Penh residents, he confirmed that he did own the land in question.³⁶³ This indicates that his role is broader than the one usually played by a minority shareholder and that he may well be breaking the law by playing a management role in a private company. In addition, Khun Sea Import Export has received negative national and international attention over the intimidation and harassment of residents who refused to leave their homes after their land had been allocated to the company.³⁶⁴ This again violates the 1998 General Statute of Military Personnel of the Royal Cambodian Armed Forces by "harm[ing] the honour and dignity of the Royal Cambodian Armed Forces."

Global Witness urges the Cambodian government to enforce Article 25 of the 1998 General Statute of Military Personnel of the Royal Cambodian Armed Forces by ensuring that military personnel contravening the statute either resign from their military position or get rid of their business holdings.

CORPORATE SECRECY AS A BARRIER TO IDENTIFYING ILLEGALITY

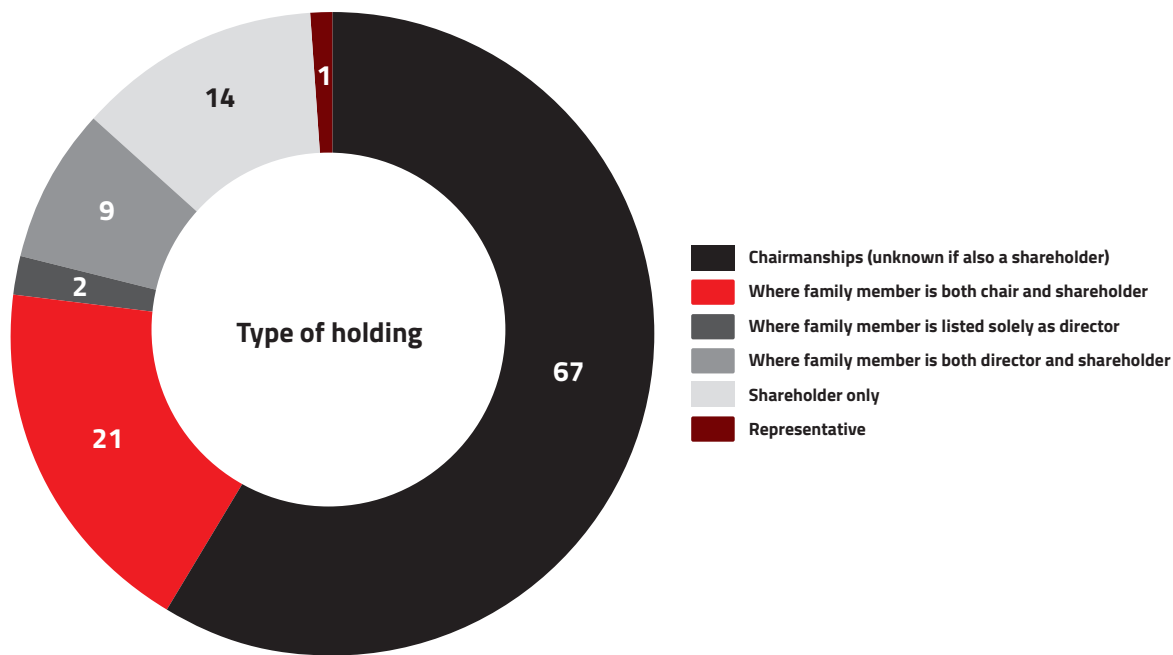
Like in many countries, corporate governance in Cambodia is largely conducted behind a wall of secrecy. The Law on Commercial Enterprises stipulates that companies file an annual declaration with the Ministry of Commerce and outlines the punishment they face for filing 'false and misleading reports'.³⁶⁵ However, company reports are not made public and it is therefore impossible to access the information they file or know which companies are complying.

In another blow to corporate transparency, Article 230 of the Law on Commercial Enterprises allows a company that "*has not issued any securities to the public, or that does not have any outstanding securities held by more than one person*" to choose not to appoint an auditor.³⁶⁶ As more than a quarter (26%) of the companies linked to members of the Hun family are classified by the Ministry of Commerce as Single Member Private Limited Companies (meaning that they only have one shareholder), this reduces the level of scrutiny by removing the requirement for them to hire an auditor.³⁶⁷

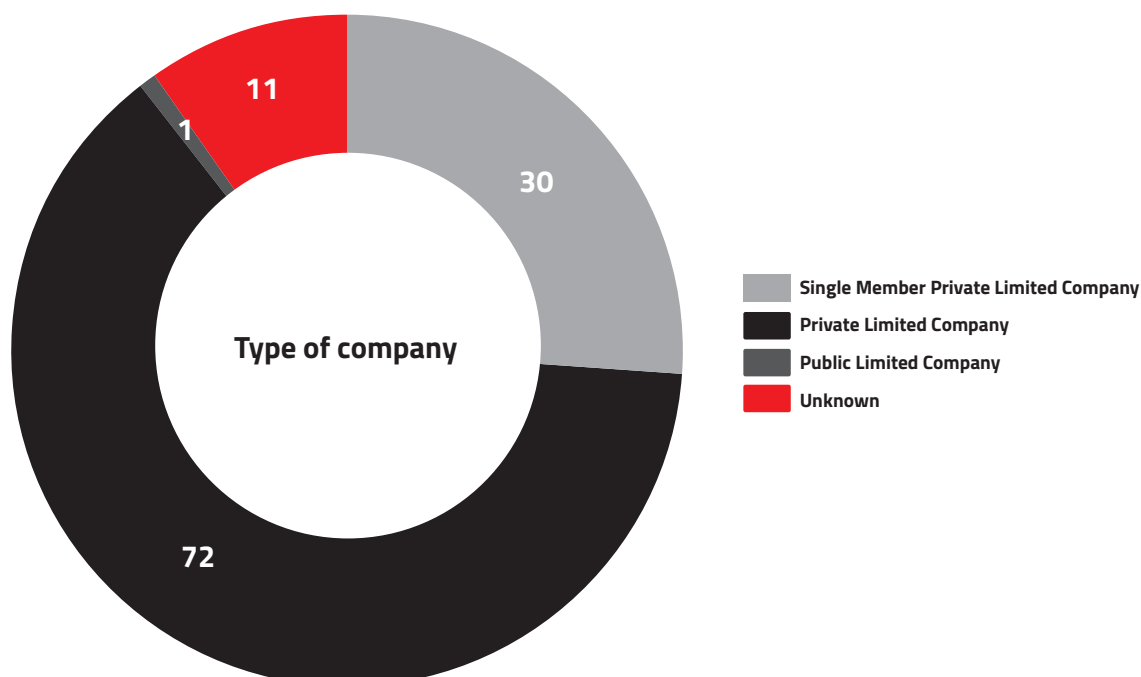
ANNEX 4 - BREAKDOWN OF KEY FINDINGS

Below is a breakdown of two of the key findings outlined in *Hostile Takeover*. The information is based solely on official data from Cambodia’s Ministry of Commerce.

- Figure 2 below shows a breakdown of the ways in which the Hun family are linked to the 114 companies which they have interests in. 103 of these companies (90%) count the family member as chairperson, director or as having a shareholding of more than 25%, meaning that they exercise total or substantial control.³⁶⁸



- Figure 3 shows the breakdown of the type of companies that Hun family members are linked to. It should be noted that 30 companies (26%) of the total 114 with links to the family are listed as a ‘Single Member Private Limited Company’ meaning that the entire share capital issued is held or owned by one single person. Hun family members are listed as company directors or chairs in all 30 of these cases, therefore it is highly likely that a member of the family is the sole owner of the majority, if not all, of these companies.³⁶⁹



ENDNOTES

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- 368** Analysis based on official government data from the Cambodian Ministry of Commerce's online corporate registry, data extracted in December 2014 and February 2016 by Global Witness. All data accessible at https://cambodiainvestment.gov.kh/anti-corruption-law_100417.html. For a full list of the Hun family's holdings see the infographic on page X or Annex 1.
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