PUBLIC PROCUREMENT AND DISPOSAL
OF PUBLIC ASSETS AUTHORITY

"Regulating for Results"

INSPECTION REPORT ON THE PROCUREMENT PROCESS FOR THE BALLOT PAPERS AND DECLARATION OF RESULTS FOR THE 2026 GENERAL ELECTIONS BY OFFICIALS OF ELECTORAL COMMISSION

ENTITY: ELECTORAL COMMISSION

JUNE 2026

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ACRONYMS

CC	-	Contracts Committee
CG	-	Central Government
EC	-	Evaluation Committee
JV	-	Joint Venture
LTD	-	Limited
PPDA	-	Public Procurement and Disposal of Public Assets Authority
UGX	-	Uganda Shillings
USD	-	United States Dollars

1.0 BACKGROUND

The Authority received a request from Inspectorate of Government to investigate irregularities in the procurement of ballot papers and declaration of results forms for 2026 general elections.

It was specifically alleged that:

1. There was unfair evaluation of bids especially for bidders who submitted bid securities issued by foreign banks. That the evaluation was done selectively because some companies were disqualified at the preliminary stage while others were allowed to proceed for evaluation at the next stage. That for the bid securities to be acceptable, they had to be issued by local banks.

That the evaluation of bids issued by foreign banks contravened the PPDA Act Cap. 205 and its accompanying guidelines. That this stipulation was designed to protect Procuring and Disposing Entities from being presented with fake or uncashable bid securities.

2. There were irregularities in the evaluation of companies that submitted bids as Joint Ventures. That for bidders who submitted bids for consideration as Joint Venture, both companies had to possess Powers of Attorney, be registered with Uganda Registration Service bureau (URSB) and on a stand-alone basis have the experience and capacity to execute the work in case one of the parties failed to meet the joint venture expectations.

That the bidders who participated in joint ventures where one member lacked the pre-requisite experience and capacity were proposed for the award of one of the lots. That this contravened the stipulations in the tender document which stated that both joint venture companies must possess the necessary experience and capacity were proposed for one of the lots.

2.0 OBJECTIVES OF THE INSPECTION

The inspection was conducted with the view of establishing whether:

1) There was unfair evaluation of bidders who submitted bid securities issued by foreign banks; and

2) There were irregularities in the evaluation of companies that submitted bids as Joint Ventures.

3.0 LAWS APPLICABLE

i) The PPDA Act, Cap 205;

ii) The PPDA Regulations 2023; and

iii) The PPDA Guidelines 2023

4.0 SCOPE

The inspection focused on the procurement process for ballot papers and declaration of results forms for the 2026 general elections.

5.0 METHODOLOGY

a) Documents retrieval and analysis: The following documents were retrieved and analyzed:

i) Procurement action file;

ii) Bids submitted by bidders; and

iii) Relevant correspondences between the Entity and various stakeholders.

b) Interviews; The following officials from Electoral Commission was interviewed:

Table 1: People Interviewed

S/N	Name of interviewee	Title	Dates
1.	Mr. Charles Lwanga	Head, Election Management	19th May 2026

6.0 SUMMARY OF FACTS

6.1 On 29th April 2025, the User Department raised a requisition worth UGX 97,876,213,000 for the procurement of ballot papers, declaration of results forms, statement of ballot papers for the Presidential and Directly Elected Members of Parliament, District Women Representatives, District/ City Women Councilors, District/City Chairpersons, District Directly Elected, Municipality/City Division Chairpersons, Municipality/City Division Women Councilors, Sub-county/Town/Municipal Division Chairpersons, Municipality/City Division Women Councilors, Sub-Elected councilors, Sub-county/Town/Municipal Division Women Councilors and Local Government Councilors representing Special interest Groups.

6.2 On 26th May 2025, the Contracts Committee approved the Open International Bidding procurement method, the bidding document and the Evaluation Committee.

6.3 On 27th May 2025, 29th May 2025 and 6th June 2025, the procurement was advertised in the Daily Monitor, the New Vision and the East African newspapers respectively.

6.4 On 27th May 2025, the Entity commenced issuance of bidding documents to bidders. This was followed by a pre-bid meeting on 4th June 2025. By 26th June 2025, the Entity had issued bidding documents to 46 bidders.

6.5 On 10th June 2025, the User Department raised another requisition worth UGX 2,270,400,000 and it was approved by the Accounting Officer on 14th October 2025.

6.6 On 10th June 2025, the Contracts Committee approved the addendum for procurement of ballot papers and declaration of result forms for General Elections 2026, which addendum was issued to bidders on 13th June 2025. Addendum No. 2 was issued to bidders on 23rd June 2025.

6.7 By 30th June 2025 when bidding closed, the Entity had received 22 bids. Bid opening was carried out on the same date at 11:15am.

6.8 On 10th September 2025, the Evaluation Committee produced an evaluation report where the Committee recommended award of contract for ten lots as detailed in table 2 below:

Table 2: Companies recommended for a ward of contract

Lot	Company Awarded	Amount (UGX)
1.	Al Ghurair Printing and Publishing	11,220,003,880
2.	Al Ghurair Printing and Publishing	12,284,999,880
3.	Al Ghurair Printing and Publishing	12,634,999,880

Lot	Company Awarded	Amount (UGX)
4.	Picfare Industries Ltd	3,479,835,308
5.	Graphics Systems Ltd	3,927,934,204
6.	Uniprint Global	8,715,834,370
7.	Inform Lykos (Hellas) S. A	9,358,035,650
8.	Inform Lykos (Hellas) S. A	9,326,785,650
9.	Sintel Security Print	1,697,128,644.25
10.	Picfare Industries Ltd	3,711,853,548
	Total value of contracts for award	**76,357,411,014**

6.9 On 10th September 2025, the Contracts Committee approved evaluation report and awarded the contracts as recommended by the Evaluation Committee. The Entity displayed the Best Evaluated Bidder Notices for the 10 lots between 15th September 2025 to 3rd October 2025.

6.10 On 14th October 2025, the Accounting Officer confirmed availability of funds before contract signing.

6.11 The Solicitor General completed clearance of contracts for the 10 lots on 3rd November 2026. By 6th November 2025, all the 10 contracts had been signed by the Entity.

7.0 FINDINGS AND CONCLUSION

7.1 Whether there was unfair evaluation of bids submitted with bid securities issued by foreign banks

7.1.1 It was alleged that there was unfair evaluation of bids especially for bidders who submitted bid securities issued by foreign banks. That the evaluation was done selectively because some companies were disqualified at the preliminary stage while others were allowed to proceed for evaluation at the next stage. That for Bid securities to be acceptable, they had to be issued by local banks. That the evaluation of bids issued by foreign banks contravened the PPDA Act Cap 205 and its accompanying guidelines since it was designed to protect Procuring and Disposing Entities from being presented with fake or un-cashable bid securities thereby ensuring that bidders fulfill their obligations as stipulated in the tender document.

7.1.2 Sub section 21.2 (b) of section 1 of Instructions to Bidders states that: *"the Bid Security shall be issued by a reputable financial institution selected by the bidder from an eligible country. If the institution issuing the security is located outside the Uganda, it shall have a correspondent financial institution located in Uganda to make it enforceable."*

7.1.3 Section 48 of the PPDA Act, Cap. 205 states that *"all procurement and disposal shall be conducted in a manner which promotes transparency, accountability and fairness."*

Entity's response

7.1.4 Mr. Charles Lwanga, Chairperson of the Evaluation Committee, stated that during the preliminary evaluation stage, the Evaluation Committee considered all bidders who had submitted bid securities of the required amount and validity period as compliant with the bid security requirement, regardless of whether the bid securities had been issued by local or foreign banks.

7.1.5 He further stated that during the financial evaluation stage, the Evaluation Committee received a whistleblower complaint alleging that some bidders had erroneously been found compliant despite submitting bid securities issued by foreign banks without corresponding local banks.

7.1.6 That following receipt of the complaint, the Evaluation Committee reassessed the bids of all bidders that had progressed to the financial evaluation stage. That upon review, the Committee established that one bidder (Aerovote Security Printing GH Ltd) had submitted a bid security issued by a Kenyan bank without a corresponding local bank. That consequently, the Evaluation Committee disqualified the bidder for non-compliance with the bid security requirements.

7.1.7 Mr. Lwanga further explained that the Committee did not re-evaluate other bidders that had submitted bid securities issued by foreign banks because those bidders had already been eliminated at the preliminary or detailed technical evaluation stages on other grounds. Accordingly, only Aerovote Security Printing GH Ltd was reassessed on the issue of bid security compliance since it was the only affected bidder that had advanced to the financial evaluation stage.

7.1.8 That no bidder who submitted bid securities issued by foreign banks with no corresponding local banks was recommended for award of contract by the Evaluation Committee.

PPDA Findings

7.1.9 Upon review of the bid documents, the Authority established that five bidders submitted bid securities issued by foreign banks, namely:

a) Aeorovote Security Printing GH Ltd submitted a Bid Security issued by the National Bank of Kenya Limited;
b) Y&T Sister Trading Company Limited submitted a Bid Security issued by the Industrial and Commercial Bank of China;
c) Lexlines Press (Pty) Ltd submitted a Bid Security issued by the Rand Merchant Bank in South Africa;
d) Shave and Gibson Group (Pty) Ltd submitted a Bid Security issued by NedBank South Africa; and
e) Buck Press Limited submitted a Bid Security issued by GCB Bank PLC in Ghana

7.1.10 The Authority noted that during the preliminary evaluation stage, the Evaluation Committee considered all bidders who had submitted bid securities of the required amount and validity period as compliant, without verifying whether bid securities issued by foreign banks had corresponding local financial institutions in Uganda.

7.1.11 The Authority further noted that it was only after receipt of a whistleblower complaint during the financial evaluation stage that the Evaluation Committee revisited the issue of compliance relating to foreign issued bid securities. Following this reassessment, Aerovote Security Printing GH Ltd was disqualified for submitting a bid security issued by a foreign bank without a corresponding financial institution in Uganda.

7.1.12 The Authority however observed that the other four bidders with similarly non-compliant foreign issued bid securities were not reassessed on the same requirement because they had already been eliminated at the detailed technical evaluation stage on other grounds.

7.1.13 Whereas this created the appearance of inconsistent treatment, the Authority noted that the circumstances did not demonstrate deliberate preferential treatment or bias against Aerovote Security Printing GH Ltd. At the time the whistleblower complaint was received, Aerovote Security Printing GH Ltd was the only bidder with a foreign issued bid security that had progressed to the financial evaluation stage. The Evaluation Committee therefore retrospectively applied the requirement relating to corresponding local financial institutions to that bidder alone because the remaining similarly affected bidders had already failed at earlier evaluation stages.

7.1.14 The Authority further noted that none of the other four bidders with foreign issued bid securities lacking corresponding local financial institutions was recommended for award of contract, as all had failed during detailed technical evaluation.

7.1.15 Notwithstanding the foregoing, the Authority found that the Evaluation Committee failed to properly and consistently assess compliance with Sub-section 21.2(b) of the Instructions to Bidders during the preliminary evaluation stage. The requirement for foreign issued bid securities to have corresponding local financial institutions in Uganda was mandatory and ought to have been uniformly applied to all affected bidders at the same stage of evaluation.

7.1.16 The Authority therefore found that the Evaluation Committee erred in initially treating the affected bidder as compliant without verifying enforceability of the foreign issued bid securities. The subsequent disqualification of Aerovote Security Printing GH Ltd arose only after receipt of a whistleblower complaint, while the remaining bidders with similar deficiencies were never formally reassessed on the same requirement.

Conclusion

7.1.17 Although there was no evidence of deliberate favoritism or preferential treatment in favour of any bidder, the Evaluation Committee inconsistently applied the bid security requirement relating to foreign issued bid securities. The Committee failed to uniformly verify, at preliminary evaluation stage, whether foreign issued bid securities had corresponding financial institutions located in Uganda as required under Sub-section 21.2(b) of the Instructions to Bidders.

7.1.18 Accordingly, the allegation of unfair evaluation was partially substantiated to the extent that the Evaluation Committee failed to consistently enforce the mandatory requirement relating to enforceability of foreign issued bid securities. However, the inconsistency did not affect the outcome of the procurement process since none of the bidders with non-compliant foreign issued bid securities was recommended for award of contract.

7.2 **Whether bidders who participated in Joint Venture where one member lacked the requisite experience and capacity were recommended for award of contract during bid evaluation**

7.2.1 The complainant alleged that there were irregularities in the evaluation of companies that submitted bids as joint ventures (JV). That for bidders who submitted bids for consideration as Joint Ventures, both companies had to possess powers of Attorney, be registered by Uganda Registration Service Bureau (URSB) and on a stand-alone basis have the experience and capacity to execute the work in case one of the parties failed to meet the joint venture expectations.

7.2.2 That bidders who participated in Joint Ventures where one member lacked the prerequisite experience and capacity were however proposed for the award of one of the lots. That this contravened the stipulations in the tender document which stated that both Joint Venture companies must possess the necessary experience and capacity to be considered compliant and eligible for a tender award.

7.2.3 Sub-section 3.4 of Section 3: Evaluation Methodology and Criteria states that: *"For a Joint Venture, the documentation in Section 3.2 shall be required for each member of the Joint Venture and the following additional documentation shall be required:*

(a) A certified copy of the Joint Venture Agreement or letter of intent to enter into such an agreement, which is legally binding on all partners, showing that all partners shall be jointly and severally liable for the execution of the Contract in accordance with the Contract terms; one of the partners will be nominated as being in charge, and receive instructions for and on behalf of any and all partners of the joint venture; and the execution of the entire Contract, including payment, shall be done exclusively with the partner in charge.

(b) A Power of Attorney from each member of the JV nominating a Representative in the JV and a Power of Attorney from the JV nominating a representative who shall have the authority to conduct all business for and on behalf of any and all the parties of the JV during the bidding process and, in the event the JV is awarded the Contract, during contract execution."

7.2.4 Sub-section 3.2 of Section 3: Evaluation Methodology and Criteria states that: *"The documentation required to provide evidence of eligibility shall be:*

(a) A Certificate of Registration issued by the Authority for bidders currently registered with the Authority, or a copy of the Bidder's Trading License or equivalent and a copy of the Bidder's Certificate of Registration or equivalent for bidders not currently registered with the Authority;
(b) A statement in the Bid Submission Sheet that the bidder meets the eligibility criteria stated in ITB 4.1;
(c) A declaration in the Bid Submission Sheet of nationality of the Bidder;
(d) A declaration in the Bid Submission Sheet that the Bidder is not under suspension by the Authority;
(e) Fulfilment of obligations to pay taxes and social security contributions in Uganda where applicable.
(f) A Power of Attorney which if signed in Uganda shall be registered; or if signed outside Uganda notarized authorizing signature of the bid on behalf of the bidder."

7.2.5 Sub-section 4 (g) & (h) of Section 3: Evaluation Methodology and Criteria of the bidding document required the bidder to have successfully completed three contracts of a similar nature and complexity of which at least two were in Africa. A reference letter was required to that effect.

7.2.6 The bidder was also required to have printed at least the number of ballot papers for the lot the bidder is bidding for with a similar complexity election.

Entity's response

7.2.7 Mr. Charles Lwanga, Chairperson Evaluation Committee stated that the Evaluation Committee evaluated the submissions of the members of Joint Venture individually. That where a member did not meet the Entity's requirement as stated in the bidding document, the Joint Venture was disqualified on that basis. That for example, Darphia Investments and Mondax-Guanggdong Joint Venture because Darphia Investment is a Ugandan company that did not have the required printing facilities while Mondax-Guangdong is a Chinese company with the required printing facilities.

7.2.8 Mr. Lwanga further stated that Sintel Security Print and Shave and Gibson Joint Venture that was awarded the contract for Lot 9 met all the requirements in the evaluation criteria, at individual level and Joint Venture level.

PPDA Findings

7.2.9 The Authority noted that out of the 22 bids submitted, seven of them were Joint Ventures namely;
i) Sintel Security Print Solutions Ltd and Shave and Gibson Security Printing (Pty) Ltd;
ii) Kadac International Group and Joos Group;
iii) Darphia Invesments and Mondax-Guangdong;
iv) D&D Law Publishing House Ltd;
v) Four Corners Transform and Baljitas Banknote;

vi) Digi Print Systems (U) Ltd and Surya Offset Security; and
vii) Uganda Security Printing and MASAR Printing.

7.2.10 Four Joint Venture, namely D&D Law Publishing, Uganda Security Printing and MASAR Printing, Darphia Investments and Mondax-Guangdong, and Digi Print Systems (U) Ltd and Surya Offset Security were disqualified at the preliminary stage for failure to comply with mandatory requirements. The deficiencies included failure by each JV member to provide certified Joint Venture agreements, Powers of Attorney, audited books of accounts, and evidence of the requisite experience, including successful completion of similar contracts and printing of the minimum required quantity of ballot papers.

7.2.11 The Authority further noted that Kadac International Group and Joos Group, together with Four Corners Transform and Baljitas Banknote, proceeded beyond preliminary evaluation but were eliminated at the financial evaluation stage for quoting higher prices while Sintel Security Print Solutions Ltd and Shave and Gibson Security Printing (Pty) Ltd was recommended for award of contract for Lot 9 at UGX 1,697,128,644.25.

7.2.12 With regard to Sintel Security Print Solutions Ltd and Shave and Gibson Security Printing (Pty) Ltd, the Authority reviewed the Joint Venture's bid document and established that both parties to the Joint Venture individually satisfied the eligibility, administrative compliance, technical capacity, and experience requirements stipulated in the bidding document. This, in spite of the fact that Sub-section 3.4 of Section 3: Evaluation Methodology and Criteria of the bidding document only required each member of the Joint Venture to meet the eligibility requirements stated in Sub-section 3.2 of Section 3: Evaluation Methodology and Criteria of the bidding document.

7.2.13 The Authority therefore found no evidence to support the allegation that bidders in Joint Ventures were recommended for award despite one member lacking the requisite experience and capacity. On the contrary, the evaluation records demonstrated that Joint Ventures whose members failed to meet the mandatory requirements were disqualified accordingly.

Conclusion

7.2.14 The Evaluation Committee properly evaluated Joint Venture bids in accordance with Sub-sections 3.2 and 3.4 of Section 3: Evaluation Methodology and Criteria of the bidding document. The recommendation of Sintel Security Print Solutions Ltd and Shave and Gibson Security Printing (Pty) Ltd for award of Lot 9 was therefore consistent with the evaluation requirements in the bidding document.

8.0 RECOMMENDATION

8.1 The Evaluation Committee should, in future, ensure that during the preliminary evaluation stage, all mandatory bid security requirements are strictly verified. This should include confirming that any bid security issued by a foreign financial institution is supported by a corresponding financial institution located in Uganda.