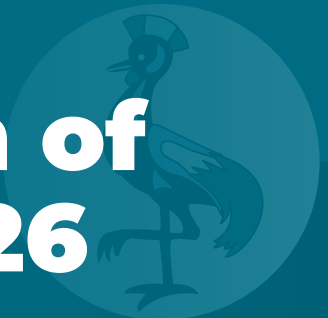


# Uganda's Protection of Sovereignty Act, 2026

June 2026



## Contextual Background

The adoption of the Protection of Sovereignty Act, 2026 followed a fast-tracked legislative process in Parliament with limited opportunity for public consultation. The stated aim of the Act is to protect the sovereignty of the people of Uganda, to provide for the registration and regulation of agents of foreigners, and to regulate the funding and any other assistance to agents of foreigners.

The Act emerges in a broader context of increasing regulation affecting civil society organizations (CSOs) in Uganda. In recent years, anti-money laundering and counter-terrorism financing measures, the Computer Misuse Act, and the Non Governmental Organisations Act have been used to suspend independent organizations, restrict speech, freeze CSO bank accounts, impose extensive disclosure requirements, and restrict activities of CSOs during elections. Against this backdrop, the Protection of Sovereignty Act is an additional law that may further affect civic space.

## Purpose of this Guide

This practical guide is intended to help individuals and organizations to understand the provisions of the Act.

This guide is produced for informational purposes only and does not constitute legal advice or substitute for legal counsel. Laws may change, and interpretations of local law may vary.

## Legislative Snapshot

### What does the law do?

Requires certain foreign-funded or foreign-linked actors to register and comply with disclosure rules and obligations related to activities.

### What is the law's aim?

Its stated aim is to protect the sovereignty of the people of Uganda, to provide for the registration and regulation of agents of foreigners; and to regulate funding and other assistance to agents of foreigners.

### Timeline

- 1** April 15, 2026  
Tabled
- 2** May 5, 2026  
Passed
- 3** May 17, 2026  
Assented
- 4** May 22, 2026  
Took effect

# How to Establish Whether the Act Applies to an Organization or Individual

The Act applies to funding of certain activities by an agent of a foreigner.

## Step 1: Establish who is a Foreigner

A foreigner is:

|   |   |  |   |
|---|---|--|---|
| A non-Ugandan citizen;  |  | A foreign government, consulate, high commission, embassy or diplomatic mission; |  |
| A corporation, company, non-governmental organization (NGO) or other legal entity, incorporated or unincorporated outside of Uganda; or |  | An international or multinational organization.                                  |  |

That undertakes, supervises, finances, or subsidizes prohibited activities specified in Section 2(2) of the Act.

## Step 2: Establish who is an Agent of a Foreigner

An agent of a foreigner is a person who undertakes certain activities, including through digital platforms:

|   |   |  |
|---|---|--|
| As an agent, representative, or employee of a foreigner; or | On the order, request, supervision, or under the direction, or control of a foreigner; or | While being financed or subsidized by a foreigner. |
|---|---|--|

## Step 3: What Activities are Covered?

An agent of a foreigner is a person or organization that:

- Engages in “political activities” in Uganda to further the interest of a foreigner;
- Solicits, collects, or disburses contributions, loans, money, or other things of value to finance or sponsor political activities to further the interest of a foreigner;
- Represents the interest of a foreigner before a Ugandan government agency or official for purposes of engaging in political activities in Uganda;
- Recruits, contracts, engages, or partners with any person in Uganda to promote the interest of a foreigner for the purpose of political activities;
- Agrees, consents, assumes, or purports to act as an agent of a foreigner to promote the interest of a foreigner against the interest of Ugandans;
- Influences the development of government policy, or implements a government policy without Cabinet approval; or
- Influences the public to oppose a government policy.

### Note:

The Act also applies to a representative or agent of an embassy, high commission or consulate, subject to the Diplomatic Privileges Act.



## Political activities

Note that “political activities” have a broad definition: **any activity aimed at influencing the enactment of legislation, the formulation of policy, or the decision-making of the government or the people of Uganda.** The definition includes:



- Fundraising, sponsoring, registering, nominating, supporting or campaigning for a candidate in an election;
- Registering, funding and campaigning for a political party in an election;
- Fundraising for, campaigning for, canvassing support for, supporting or opposing, a political party or candidate in an election;
- Any activities aimed at influencing the outcome of an election;
- Any activities aimed at influencing the will and consent of the people of Uganda to determine who shall govern the people and how the people shall be governed; or
- Any activities aimed at influencing, imposing or normalising ideologies which are inconsistent with the Constitution or which conflict with any culture, customs or norms of any of the communities listed in the Third Schedule of the Constitution.

# Aid and Activities to which the Act does not Apply

Section 2(4) excludes certain categories of funding and activities from the scope of the Act. These include funds received by:

- A supervised institution, a person or an institution regulated by a regulatory body under an Act of Parliament to meet its regulatory requirements, or to undertake its commercial, licensed or permitted activity under an Act of Parliament,
- A health or medical facility performing its lawfully permitted activities,
- An academic and research institution for funding research and innovation or other lawfully permitted educational activities,
- An individual receiving funds for commercial, domestic or family use, or
- A faith-based organization for activities connected with its mission.

# Aid and Activities that do not Require Compliance with the Act

Section 2(5) states that nothing in this Act shall be construed as requiring compliance with this Act for lawful:

|  |  |  |
|--|--|--|
| Foreign direct investment, portfolio investment<br> | Diaspora remittances, export proceeds<br> | Humanitarian assistance, technical assistance<br> |
| Grants and development assistance<br>               | Scholarships; concessional financing<br>  | Any other lawful foreign exchange flow<br>        |

NOTE: The Act does not define these terms, and the practical scope of this provision therefore remains to be clarified through regulations or further guidance.

# What Activities are Restricted for Agents of Foreigners?

The Act establishes several categories of conduct that are prohibited when undertaken by an agent of a foreigner. These include:

- Promoting the interests of a foreigner against the interests of Uganda (**see note 1 >**)
- Exercising certain functions and services of government without approval of the relevant Government agency and Cabinet, or without a license or permit from Government (**see note 2 >**)
- Influencing or proposing amendments to the development of a government policy without consideration by the relevant Ministry, department or agency of government
- Knowingly developing or implementing a government policy without Cabinet approval
- Hindering, frustrating or disrupting the implementation of a government policy
- Promoting a foreign policy that contravenes principles set out in the Act
- Interfering with electoral processes
- Interfering with the operations of government
- Economic sabotage, including publishing “false information” that “weakens ... the economic system ... causing economic disruption, insecurity or instability”
- Obtaining funds to overthrow or endanger the security of Uganda, or to participate in “disruptive activities” (**see note 3 >**)

## Notes on restricted activities



### Note 1:

The Act defines the interests of a foreigner as interests that are not aligned with policies and laws developed and adopted by the Government of Uganda. The interests of Uganda refers to national interests enshrined in certain parts of the Constitution, laws of Uganda, and government policy.

### Note 2:

Government functions referenced in the Act draw from the Sixth Schedule of the Constitution and include areas such as **taxation, citizenship and immigration, land and natural resources, energy policy, transport and communications, the judiciary, education policy, health policy, and matters connected to those functions.** Section 6 requires approval from the relevant government agency, which itself must obtain Cabinet approval before authorizing an agent of a foreigner to conduct such activities.

### Note 3:

The Act prohibits obtaining or soliciting funds from a foreign source to engage in “disruptive activities” such as:

- Any act or conduct that is prejudicial to or threatens security of Uganda, threatens violence or bodily harm against any person
- Threatening destruction of property
- Engaging or participating in a riot, unlawful demonstration or assembly
- Disrupting or interfering with lawful business operations, peace or human rights of another person.

# What Obligations do Agents of Foreigners Have?

## Mandatory Registration

An agent of a foreigner must register with the Department of Peace and Security and obtain a certificate of registration from the Ministry of Internal Affairs (Section 14). This is mandatory before one can act as an agent.

The agent of a foreigner must apply for registration with the Minister, and disclose the following detailed information about the agent, the foreigner, the activities and sources of funding:

- Applicant's name, principal business address, and all other business addresses in Uganda or elsewhere, and residential addresses;
- For an individual applicant, his/her nationality;
- For a partnership, the name, residential address and nationality of each partner;
- For an association, corporation, organization, or other combination of individuals, the name, residential address, nationality of each director or officer, and complete copy of the applicant's charter, articles of association, constitution, by-laws and amendments;
- A complete list of the applicant's employees and a statement of the nature of the work of each employee;
- The name and address of every foreigner for whom the applicant is acting;
- The character and business "or other" activities of every such foreigner, including statement of ownership and control of the foreigner and the extent to which the foreigner is supervised, directed, owned, controlled, financed, or subsidized by a foreign government or foreign political party, or by any other foreigner;
- Copies of each written agreement and the terms and conditions of each oral agreement by reason of which the applicant is an agent of a foreigner;
- A comprehensive statement of the nature and method of performance of each contract, including detailed description of existing and proposed activities that the applicant will engage in, including political activities;

## Summary of obligations

- 1 Mandatory registration
- 2 Submit returns
- 3 Declare sources of funding
- 4 Comply with other finance-related obligations
- 5 Submit to court-ordered inspections

- The nature and amount of contributions, income, money, or things of value that the applicant has received from a foreigner within the previous 60 days (compensation and disbursements); and
- Any other information that the Minister prescribes.

The Department of Peace and Security has 14 days from receipt of the application from the Ministry to conduct enquiries into the suitability of the applicant and make a recommendation to the Minister. Enquiries can include asking a person, department or agency of government to provide information about the applicant, or consulting the local authorities in the place where activities will take place.

The Minister considers the Department's recommendation and either issues a certificate, or refuses to do so within 14 days of receiving the recommendation.

In the case of a refusal, the applicant is entitled to apply to a court for legal redress.

An applicant must apply for renewal of the certificate at least three months before the certificate expires.

The Minister may suspend or revoke a certificate where the holder of the certificate:

- gave false or misleading information at the time of applying for registration;
- is not complying with the terms and conditions of registration;
- has committed an offence under the Act;
- has become insolvent or is under administration;
- poses, or the holder's activities pose, a security threat to national security and the surrounding community; or
- engages in disruptive activities.

## **Submit Returns**

An agent of a foreigner must submit operational and financial returns to the Minister about funds received and the purpose for which the funds were used (Section 26).

## **Declare Sources of Funding**

An agent of a foreigner must declare sources of funding to the Minister (Section 21).

## **Comply with Other Finance-Related Obligations**

An agent of a foreigner must not directly or indirectly obtain or receive any financial support, donation, loan or other assistance from a foreigner (in cash or kind) in excess of UGX 400 million (approximately USD \$106,000) within a period of 12 months without declaring the funds to the Minister (Section 22).

An agent of a foreigner is prohibited from directly or indirectly obtaining, soliciting, receiving, demanding, requesting or accepting funds, financial support or other assistance from a foreign government, institution, body or person which or who has demonstrated an intention to overthrow the established government of Uganda or endanger the country's security (Section 23).

An agent of a foreigner is prohibited from directly or indirectly obtaining, soliciting, receiving, demanding, requesting or accepting funds, financial support or other assistance from a foreign government, institution, body or person to participate or recruit any person to participate in disruptive activities (Section 23).

An agent of a foreigner must submit proof of declarations to supervised institutions before a supervised institution can pay out money to the agent (Section 25). Additionally, the supervised institution is required to submit to the relevant regulator a monthly report on the funds transferred to the agent.

## Submit to Court-Ordered Inspections

An agent of a foreigner must comply with court-ordered inspections, including permitting entry, access to any property, books of account, records, returns, documents or information requested by a person appointed by the Minister, unless there is a "lawful excuse" to deny access (Section 28).

## Penalties

Offenses under the Act are subject to significant criminal and civil penalties including, for certain offenses, imprisonment up to ten years and a fine up to 50,000 currency points (UGX 1 billion or approximately USD \$265,000) for individuals, and a fine up to 100,000 currency points (UGX 2 billion or approximately USD \$530,000) for legal entities. Where a legal entity commits certain offenses, such as obtaining funds from a foreigner to engage in "disruptive activities" (Section 23), the director or head of a legal entity may be deemed to have committed the offense.

### Contact us

For more information about the Protection of Sovereignty Act, 2026 or other legislation affecting civil society in Uganda, please contact us at [africa@icnl.org](mailto:africa@icnl.org).

