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**SUBMISSION OF THE INTERNATIONAL COMMISSION OF JURISTS TO UNIVERSAL
PERIODIC REVIEW OF ESWATINI (4th cycle)**

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Composed of 60 eminent jurists and lawyers from all regions of the world, the International Commission of Jurists promotes and protects human rights through the Rule of Law, by using its unique legal expertise to develop and strengthen national and international justice systems. Established in 1952 and active on five continents, the ICJ aims to ensure the progressive development and effective implementation of international human rights and international humanitarian law; secure the realization of civil, cultural, economic, political and social rights; safeguard the separation of powers; and guarantee the independence of the judiciary and legal profession.

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Introduction

1. In this contribution to the Universal Periodic Review (UPR) of Eswatini,¹ the International Commission of Jurists (ICJ) raises concerns and makes recommendations about the following concerns:
 - Failure to secure judicial independence;
 - Failure to safeguard the independence of lawyers;
 - Repression of rights to dissent, and protest; and
 - Failure to investigate human rights abuses.
2. Eswatini accepted numerous recommendations on those concerns during its Third (2021),² Second (2016),³ and its First UPR Cycle.⁴ Eswatini has repeatedly accepted UPR recommendations relating to the suppression of the rights of human defenders, the failure to investigate human rights violations against human defenders, and the enhancement of judicial independence. Despite this, little, if any, progress has been made in implementing such recommendations. In fact, the Eswatini government has doubled down on the application of repressive laws and the suppression of dissent to such an extent that the chilling effect on human rights defenders remains at a point of crisis.

Judicial Independence

3. The Constitution of Eswatini secures access to “an independent and impartial court”.⁵ It also includes as “Directive Principles of State Policy”⁶ a set of “Objectives on the Independence of Judiciary”, which include a wide range of protections for institutional and individual judicial independence. The Constitution describes the judiciary as “independent and subject only to this Constitution”.⁷ It is not “subject to the control or direction of any person or authority”.⁸ Interference with judicial officers by executive and legislative officials is explicitly prohibited.⁹ Safeguards for financial and administrative independence of the judiciary are provided for.¹⁰
4. Despite these and other constitutional judicial independence protections, ICJ has over the past two decades detailed significant deficiencies concerning judicial independence in Eswatini. The ICJ’s 2025 research report highlights the following critical issues.
5. Public confidence in the judiciary in Eswatini is very low. Survey data indicate that a majority of respondents express little or no trust in courts alongside widespread perceptions of corruption among juridical officers.¹¹
6. Section 159 of the Constitution establishes an independent Judicial Services Commission (JSC) and provides for its composition. Among other functions provided by section 160 of the Constitution, the JSC advises the King on judicial appointments and the removal of the Director of Public Prosecutions and other public officers. It further plays a role in disciplinary proceedings, including being empowered to exercise disciplinary control over those persons and to remove them from office.
7. The Judicial Service Commission Act 13 of 182 (JSC Act), the sole legislation establishing and empowering the JSC, predates the 2005 Constitution by over two decades.¹² It is therefore inconsistent with the Constitution in some critical respects. For example, section 3(1) of the JSC Act lists as members of the JSC: the Chief Justice; the Chairman of the Civil Service Board; three persons appointed by the King on such terms and conditions as he may determine, two of whom must possess such legal qualifications and experience as the King may determine. The King is therefore ultimately responsible for the appointment of all members of the JSC, either directly or indirectly.
8. The Act also provides the JSC with significantly circumscribed powers to appoint, discipline,

and remove judicial officers,¹³ given the primacy afforded to the King in both appointments of members of the JSC and judges. This creates the perception that the "JSC strongly favours Royalty, compromising its independence and, by logical extension, compromising the independence of the judiciary".¹⁴

9. Contrary to legal requirements, the inputs of the Law Society are often not solicited during JSC processes. Appointments of judges have frequently occurred contrary to constitutional provisions and "the Commission has not performed its disciplinary functions impartially and has collaborated in abusive proceedings, for instance to arbitrarily dismiss a judge deemed too independent".¹⁵
10. Under the JSC Act,¹⁶ the JSC is empowered by to regulate its own procedure, and the Act implies a power to enact regulations or guidelines by broadly empowering the JSC to "do all such other things... as are incidental or conducive to the exercise of its functions".¹⁷ Despite this, the JSC of Eswatini has never produced or publicized any detailed guidance on the appointment process, which is described only in broad terms on its website.¹⁸
11. As a matter of established practice, the JSC operates opaquely, without adequate external input. Historically, vacancies were not even advertised, though more recently the JSC has advertised some posts publicly. JSC interviews are not conducted in public. The JSC has not provided any indication of the guidelines it follows when making appointments, either generally or in individual cases. The shortlist of candidates submitted to the King for consideration for appointments is also not made public.
12. The outcomes of judicial appointment processes have similarly been questioned by lawyers. There is significant consensus among the legal community in Eswatini that individuals appointed to judicial office are often unqualified for these positions, including due to little or no experience in legal practice. Many judges are perceived by lawyers to be intimidated by basic aspects of their judicial roles. In addition, lawyers frequently raise concerns about the appointment as judges of lawyers who are members of, or have close connections to, the royal family.¹⁹ Lawyers interviewed by the ICJ for its research almost unanimously agreed that, while some independent judges perform their roles diligently and effectively, the common view expressed was that such judges are in the minority.²⁰
13. Section 153(5) of the Constitution provides a separate process for the appointment of acting judges for an "unrenewable" term which "does not exceed one month", with the single procedural requirement being that the Chief Justice is required to "consult" with the Judicial Service Commission before doing so. Provision is also made for the continuation of an acting appointment for a "period not exceeding three months" to allow such a judge to "enable that person to deliver judgement or to do any other thing in relation to proceedings that were commenced before that person previously to the expiry of the acting appointment".
14. The Chief Justice has been accused of abusing his power to appoint acting judges on a continuously renewed basis. The result is that such acting judges, who are reliant on frequent renewals of their tenure by the Chief Justice "have no ultimate accountability other than to the Chief Justice". Such renewals are so commonplace that the Law Society describes a number of judges as, in effect, "permanent Acting Judges". The Law Society also alleges that the Chief Justice is using this power to appoint acting judges for the improper purpose of "establishing patronage in the legal fraternity" and "manipulate judicial decision-making".²¹
15. The problems relating to judicial appointments are compounded by issues relating to case allocation. In practice, it is widely known that case allocation and management, including the designation of judges to particular cases, are determined by the Chief Justice alone, through a process that lacks transparency.

16. The result is that certain judges are commonly allocated to particular cases, while other judges are not assigned to any cases perceived as controversial. The clear perception of lawyers in Eswatini is that this is done to ensure that the Chief Justice can maintain control over the outcomes of such cases.
17. For example, some lawyers note that cases relating to terrorism charges and questions concerning the constitutional validity of critical legislation on terrorism, sedition and public order policing are consistently heard by very specific judges, commonly perceived to be sympathetic to the government and the King. The three judges in question have been allocated to dozens of cases of this nature, are therefore referred to colloquially as the "Terrorism Division" of the Courts, even though no such division exists within the court system.
18. Lawyers consider that the Chief Justice routinely abuses his power. Chief Justice Bheki Maphalala's tenure as head of the Eswatini judiciary has been marked by repeated controversy, including ongoing allegations of abuse of power and corruption. These allegations include those highlighted by the Law Society of Eswatini in an unresolved complaint submitted against the Chief Justice, seeking his removal, in December 2022.²²
19. In addition, the Chief Justice has engaged in a public dispute with members of the Eswatini legislature, threatening them with contempt of court, after Parliament sought to institute an inquiry into the affairs of the Master's Office. Instead, the Chief Justice appointed an internal inquiry into the Master's Office, without a clear legal basis.²³

Independence of lawyers

20. Independence of lawyers remains under severe strain. The ICJ has documented a range of challenges to the independence of lawyers in Eswatini, and, more specifically relating to lawyers who are perceived to represent controversial clients. While what constitutes a "controversial" client may vary, this category may include: clients accused of sedition, terrorism or protest and dissent related criminal charges; clients asserting their human rights or challenging the conduct of the government and/or royal family; and clients more generally challenging the interests of the government and/or royal family.
21. Lawyers representing clients perceived as "political" face serious and intersecting threats. These include risks to life and physical safety, harassment and intimidation (including threats of sexual violence against women lawyers), economic retaliation, and improper association with their clients' alleged conduct solely for carrying out legitimate professional functions. Lawyers also report systemic pressures that undermine their ability to act independently, particularly in cases arising from the June 2021 unrest. These challenges have been further intensified by the killing of Thulani Maseko and the broader shrinking of civic space²⁴:
22. Moreover, since the publication of the ICJ's report, media reports document a growing trend whereby one judge has repeatedly misused contempt proceedings to charge and jail lawyers for complaining on behalf of their clients, about the way their matters are handled.²⁵ In some instances, such contempt proceedings have been initiated by this judge, seemingly in direct response to legitimate requests that the judge recuse himself from matters due to conflicts of interest.²⁶ The same judge has, in undertaking such contempt proceedings, compared contempt of court charges to treason.²⁷
23. The lingering threat of contempt charges against lawyers is compounded by another practice whereby lawyers are sometimes prevented entirely from performing their professional duties through what they describe as being "banned" by specific judges from appearing before their courts in certain matters. For example, the Acting Principal Magistrate of one court reportedly told a particular lawyer that "she no longer wants me... in the court".²⁸ This lawyer told the ICJ that this practice "is not something that is unknown", and ICJ has been referred to several

similar examples.

Repression of rights to dissent

24. Despite repeated recommendations to the contrary, Eswatini continues to implement and apply overly broad provisions of its Suppression of Terrorism Act, the Sedition and Subversive Activities Act, and the Public Order Act to suppress dissent, disagreement and legitimate protests.
25. In 2024, Eswatini's Supreme Court upheld the constitutional validity of the Suppression of Terrorism Act.²⁹ Shortly thereafter, two opposition MPs were convicted under the Terrorism Act and the Sedition Act and sentenced to 85 years' and 58 years' imprisonment respectively.³⁰ The Inter Parliamentary Union conducted an independent trial observation of the prosecution of the two accused, concluding that the actions of the MPs did not reflect criminal intent or result in the alleged harm. Its report asks directly, "how can civil disobedience be equated with terrorism and sedition?", which reflects the practical effect of the judgment.³¹
26. Lawyers indicate that numerous cases under these same laws have also been brought in connection with the civil unrest of June 2021, showing that the heavy-handed application of these overly broad laws remains a common State response to dissent. This has increased since the civil unrest of June 2021, which involved pro-democracy protests deemed in their entirety by the Eswatini State to constitute terrorist activity. Since then, it has been observed that "any political act" is now viewed as a "sequel to that civil unrest and hence people are charged as terrorists". Simply put, the Terrorism Act "allows the state to reclassify any perceived threat, no matter how small or non-violent, as an act of terrorism", which the State now routinely does.³²

Failure to investigate human rights abuses

27. On 29 October 2021, the Eswatini Commission on Human Rights and Public Administration/Integrity issued a report titled "Preliminary Assessment Report on Civil Unrest in the Kingdom of Eswatini – June 2021". The report records and verifies at least 46 deaths arising from the June 2021 unrest, including two children, seven women, seven young people, two elderly people and 30 men. It also confirmed the arrest and detention of at least 337 people, and that gunshot injuries were sustained by at least 245 people. This figure is certainly a significant undercount.³³
28. The Commission recommended that the authorities initiate prompt, independent, impartial and transparent investigations into allegations of the death of civilians at the hands of security agents during the unrest of June 2021, with the objective of bringing those responsible to account and providing reparations to families of victims.³⁴ Eswatini has yet to make any progress in initiating such a process or implementing any of the Commissions' other recommendations.³⁵
29. A similar situation persists in respect of the well-documented assassination of human rights defender and lawyer Thulani Maseko in January 2023. Despite repeated calls for independent investigations into Mr Maseko's murder,³⁶ no progress has been made to date. In an interview conducted during the preparation of this submission, Mrs Tanele Maseko, the wife of the late Mr Maseko, indicated that despite repeated attempts to follow up with the relevant investigating officers, they reported no progress regarding the investigation, even with respect to preliminary findings, such as ballistics or pathologists' reports. The impression Mrs Maseko is left with is that the investigation is either not proceeding at all or is not a matter of priority.

Recommendations

30. In light of the foregoing, the ICJ calls upon the HRC and the Working Group on the UPR to recommend to the Eswatini authorities:

- a. Take expeditious measures to secure the independence of the judiciary in Eswatini including by:
 - Ensuring the expeditious resolution, through the appropriate constitutional channels and processes, of the complaint initiated by Law Society against the Chief Justice.
 - Reviewing and amending the JSC Act to remove any control or undue influence by the Crown over the composition of the JSC and the judiciary.
 - Developing, publishing and implementing clear, transparent and appropriate processes with detailed and objective criteria, for the appointment, promotion, suspension, transfer, and disciplining of judicial officers.
 - Ensuring that case allocation occurs on a transparent basis according to objective criteria.
 - Ensuring that the appointment of temporary, casual or short-term judges on a permanent or continuously renewed basis ceases, and that any such judges are provided with the same institutional and individual guarantees of independence as permanent judges.
- b. Immediately desist from any acts of persecution, intimidation and harassment of lawyers and:
 - end unlawful surveillance of lawyers in connection with their carrying out their professional functions;
 - provide protection to lawyers who report intimidation, harassment and reprisal; and
 - actively and publicly condemn any assertions of connection or association between the views or actions of lawyers and their clients, and promote a public understanding of the critical role of lawyers in advancing the rule of law and human rights.
- c. Withdraw all banning orders – whether formal or informal – against individual lawyers from attending to matters in specific courts or before specific judicial officers.
- d. Investigate the abuse of contempt of court charges by judges against lawyers to stifle their engagement with courts.
- e. Immediately declare a moratorium on the application of the Sedition and Subversive Activities Act, the Suppression of Terrorism Act, and the Public Order Act to target human rights defenders, lawyers, and individuals engaged in protests for democratic and constitutional reform.
- f. Review and repeal or amend the Sedition and Subversive Activities Act, the Suppression of Terrorism Act, and the Public Order Act to ensure compliance with the Constitution and international human rights law and standards.
- g. Reevaluate and review the charging, sentencing and conviction of individuals under public order laws relating to the June 2021 unrest, with a view to:
 - assessing their conforming with domestic and international human rights law; and
 - redressing any improper charges or unfair trials, including, where warranted, by quashing convictions.
- h. Establish a fully independent mechanism comprising a mix of independent Eswatini lawyers and independent international legal experts, including from the African region, with a view to expediting effective, thorough and impartial investigations

of:

- i. the deaths and injuries of protesters in connection with June 2021 unrest;
- ii. Thulani Maseko's extrajudicial killing;
- iii. the harassment, intimidation and targeting of lawyers and human rights defenders, for alleged conduct relating to legitimate exercise of freedom of expression and political participation, including criticism of the government and government policy and conduct, calls for constitutional reform, and advocacy for democracy and human rights.

ENDNOTES

¹ The present submission draws on the [ICJ's 2025 report](#) on the independence of judges and lawyers in Eswatini; the ICJ's submissions to the UN Special Rapporteur on Independence of Judges and Lawyers in January 2026, and the [Special Rapporteur's communication](#) to Eswatini dated 7 April 2025. Eswatini authorities have yet to respond to the Special Rapporteur's communication. See, "No Situation is Permanent" – Repression, Intimidation, Harassment and Killing of Lawyers in Eswatini, ICJ, February 2025, available at <https://www.icj.org/wp-content/uploads/2025/01/FINAL-No-Situation-Is-Permanent-February-2025.pdf>; and <https://www.ohchr.org/en/calls-for-input/2026/call-input-special-rapporteur-independence-judges-and-lawyers-next-thematic>.

² Across three UPR cycles (2011, 2016, and 2021), recommendations were made to Eswatini concerning judicial independence, the protection of lawyers, journalists, and human rights defenders, accountability for human rights violations, and concerning the repeal or amendment of laws unduly restricting civil and political rights. During its third UPR cycle, Eswatini accepted the following recommendations: That Eswatini promptly, independently and transparently investigate excessive use of force by law enforcement against peaceful protestors, particularly those between May and July 2021; That Eswatini take measures to prevent and ensure accountability for attacks, repression and intimidation of journalists, human rights defenders and peaceful protesters; That Eswatini implement constitutional protections to ensure the independence of the judiciary; That Eswatini intensify reform of the judicial system; That Eswatini amend or repeal laws unduly restricting civil and political rights, including the Public Order Act, the Suppression of Terrorism Act, and the Suppression of Sedition and Subservice Activities Act; and withdraw all criminal charges brought against human rights defenders and political opponents under the Suppression of Terrorism Act of 2008. See, <https://docs.un.org/en/A/HRC/49/14>;

³ During its second UPR cycle, Eswatini accepted the following recommendations: That Eswatini strengthen constitutional protections to ensure the independence of the judiciary; That Eswatini adopt measures to intensify the reform of the judicial system and its plan to ensure the judiciary's independence and impartiality; That Eswatini amend laws and regulations governing the Judicial Service Commission, including by removing the Crown's control over the Commission's composition; That Eswatini review and amend the Suppression of Terrorism Act, the Sedition and Subversive Activities Act and the Public Order Act; That Eswatini withdraw all criminal charges brought against human rights defenders and political opponents under laws such as the Suppression of Terrorism Act of 2008 and other security legislation; and That Eswatini take the necessary measures to ensure that journalists, human rights defenders and members of all political parties can exercise their activities freely.

⁴ During its first UPR cycle, Eswatini accepted the following recommendations: That Eswatini take concrete and immediate measures to guarantee the independence and the impartiality of the judiciary; That Eswatini put in place human rights training programmes for members of the judiciary and law enforcement officials, including the police, security forces and correctional officers; That Eswatini take immediate steps to repeal and amend laws such as the Sedition and Subversive Activities Act and the Suppression of Terrorism Act; and That Eswatini take measures to enhance processing and reporting of human rights abuses by State and non-State actors, including investigations of the allegations of arbitrary arrest and detentions associated with protests.

⁵ The Constitution of the Kingdom of Swaziland Act 2005, Section 21(1).

⁶ Ibid, section 62.

⁷ Ibid, section 138.

⁸ Ibid, section 141.

⁹ Ibid.

¹⁰ Ibid.

¹¹ An Afrobarometer report published in 2023 indicates that only 7.8 percent of respondents had “a lot” of trust in “courts of law” and a further 20.7 percent reported trusting courts “somewhat”. As many as 44.2 percent of respondents in Eswatini indicated that they had “no trust at all” for courts and 21.4 percent expressed “only a little” trust for courts.¹¹

A mere 8 percent of respondents indicated a belief that no judicial officers were involved in corruption. As many as 13.4 percent of respondents expressed the view that “all” judicial officers were involved in corruption, with 23.2 percent indicating that “most” judges were involved in corruption and a further 38.3 percent indicating that “some” were involved.

‘Afrobarometer Round 9 survey in Eswatini: Summary of results, 2023,’ available at: <https://www.afrobarometer.org/wp-content/uploads/2023/11/Summary-of-results-Eswatini-R9-Afrobarometer-24nov23.pdf>.

¹² Judicial Service Commission Act, 1982, Act 13 of 1982.

¹³ CJ, Report of the Centre for the Independence of Judges and Lawyers (Fact-Finding Mission to the Kingdom of Swaziland), June 2003, available at: https://www.icj.org/wpcontent/uploads/2012/03/swaziland_fact_finding_10_06_2003.pdf.

¹⁴ ICJ, ‘Achieving Justice for Gross Human Rights Violations in Swaziland: Key Challenges, May 2018,’ 2018, available at: <https://www.icj.org/wp-content/uploads/2018/05/SwazilandGRABaselineStudy-Publications-Reports-Thematic-reports-2018-ENG.pdf>, p 7.

¹⁵ ICJ, ‘Justice Locked Out: Swaziland’s rule of Law Crisis’ (International Fact-finding Mission Report),’ 2015, available at: <https://www.icj.org/wp-content/uploads/2016/02/Swaziland-Justicelocked-out-RoL-crisis-Publications-Fact-Finding-Mission-Report-2016-ENG.pdf>, p 22-24.

¹⁶ Section 4(8).

¹⁷ Section 6(c) read with a range of provisions referring to regulations enacted in terms of the Act without specifying who they are to be enacted by.

¹⁸ <https://www.judiciary.org.sz/jsc.php>

¹⁹ <https://www.icj.org/wp-content/uploads/2025/01/FINAL-No-Situation-Is-Permanent-February-2025.pdf> p 57-8.

²⁰ Ibid, p 59.

²¹ Law Society of Eswatini Complaint, on file with ICJ, available at <https://www.icj.org/wpcontent/uploads/2025/02/LSS-Judicial-Conduct-Complaint.pdf>,

²² As examples, the complaint alleges that:

- a. the Chief Justice has abused the appointment of acting and temporary judges to exert control over such judges, who are then only accountable to him because of their lack of security of tenure;
- b. the Chief Justice has improperly interfered with the administration of justice in a number of specific cases, including by appointing a panel of judges to adjudicate a matter to which he was a party, and by failing to recuse himself from a matter despite commenting on it publicly prior to the application being heard; and
- c. the Chief Justice has abused his powers to usurpe the Law Society’s authority in the banning of a particular lawyer from appearing before any court. See,

<https://www.icj.org/wp-content/uploads/2025/02/LSS-Judicial-Conduct-Complaint.pdf>.

²³ Sibusiso Nhlabatsi “Chief Justice using judicial independence to create a fiefdom in the court system” *The Nation* (Feb 2026); <https://times.co.sz/news/readmore.php?bhsadjgfoh=Judiciary+warns+MP+against+contempt&yiphi=1351&bvhdgsj=News>.

²⁴ ICJ research and interviews with lawyers in Eswatini document the following challenges:

- Lawyers fear being extrajudicially killed.
- Lawyers are followed, harassed, threatened and intimidated.
- Women lawyers are threatened with sexual violence.
- Lawyers are associated with the actions of their clients **solely** as a consequence of carrying out their legitimate professional functions.
- Lawyers face adverse economic consequences for taking on cases or clients perceived as “political”.
- Lawyers identify worrying challenges in respect of the Law Society of Eswatini’s execution of its mandate.

- Lawyers report operating in an environment that inhibits their ability to act independently.
- Lawyers allege that the judiciary is not independent.
- Lawyers consider that the Chief Justice of Eswatini abuses his power.
- Lawyers experience significant obstacles and pressures in relation to cases emanating from the June 2021 unrest.
- Lawyers are significantly adversely impacted by the killing of Thulani Maseko.
- The shrinking of civic space more broadly.

²⁵ Nimrod Mabuza "Tyrant Mlangeni was fired for corruption as a minister" *The Nation* (May 2025).

²⁶ Nimrod Mabuza "A judge was fired to allow Macaleni's tyranny to go unchecked" *The Nation* (June 2025).

²⁷ Bheki Makhubu "Speaking My Mind" *The Nation* (June 2025).

²⁸ <https://www.icj.org/wp-content/uploads/2025/01/FINAL-No-Situation-Is-Permanent-February-2025.pdf>, p 51-53.

²⁹ <https://www.amnesty.org/en/latest/news/2024/08/eswatini-major-setback-as-supreme-court-upholds-repressive-suppression-of-terrorism-act/>

³⁰ <https://www.amnesty.org/en/latest/news/2024/07/eswatini-authorities-must-quash-convictions-and-sentences-of-former-mps/>

³¹ IPU, 'Eswatini: Decision adopted unanimously by the IPU Governing Council at its 213th session (Geneva, 27 March 2024), available at: https://www.ipu.org/sites/default/files/documents/eswatini-e_0.pdf; 'Trial Observer Report: Eswatini - March 2023,' 15 March 2023, available at: <https://www.ipu.org/documents/2023-03/trial-observer-report-eswatini-march-2023>; and 'Trial Observer Report: Eswatini - February 2024,' 25 March 2024, available at: <https://www.ipu.org/documents/2024-05/trial-observer-report-eswatini-february-2024>.

³² Sibusiso Nhlabatsi "Terrorism law is used to crush dissent and criminalise free speech" *The Nation* (September 2025).

³³ https://www.hrw.org/sites/default/files/media_2025/10/eswatini1025%20web.pdf

³⁴ <https://www.icj.org/wp-content/uploads/2021/11/FSEJ-Eswatini-Shadow-Report-November-2021.pdf>

³⁵ https://www.hrw.org/sites/default/files/media_2025/10/eswatini1025%20web.pdf

³⁶ <https://www.chr.up.ac.za/latest-news/4295-solidarity-as-strategy-the-3rd-annual-thulani-maseko-memorial-lecture-calls-for-a-sustained-infrastructure-of-justice-for-human-rights-defenders>; <https://www.ohchr.org/en/press-releases/2023/01/turk-condemns-killing-eswatini-human-rights-lawyer-urges-accountability>; <https://www.ohchr.org/en/press-releases/2024/01/eswatini-un-experts-commemorate-human-rights-defender-thulani-maseko-deplore>; <https://achpr.au.int/en/news/press-releases/2023-01-23/press-statement-brutal-murder-prominent-swati-human-rights-activist>.