



Republic of Serbia



REPUBLIC OF SERBIA
THE AGENCY
FOR PREVENTION
OF CORRUPTION



WORK REPORT

for 2024



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TABLE OF CONTENTS:

INTRODUCTORY REMARKS	7
BRIEF OVERVIEW	9
RECOMMENDATIONS	11
THE AGENCY	12
OVERVIEW OF ACTIVITIES AND RESULTS	16
INTERNATIONAL COOPERATION	44
INTERNATIONAL PROJECTS	47
SUPERVISION OF IMPLEMENTATION OF NATIONAL STRATEGIC DOCUMENTS AND PARTICIPATION IN THE DRAFTING	49
COOPERATION WITH OTHER STATE BODIES	51
COOPERATION WITH CIVIL SOCIETY ORGANIZATIONS	55
RAISING PUBLIC AWARENESS	57
REPORT ON THE WORK OF THE COUNCIL	60
CORRUPTION RESEARCH	62
STRENGTHENING THE CAPACITY OF THE AGENCY	64
GENDER PERSPECTIVE OF PREVENTING CORRUPTION	71

**„The first sign of corruption
in a society that is still alive is that
the end justifies the means.“**

George Bernanos

INTRODUCTORY REMARKS

In 2024, the Republic of Serbia was the subject of a series of essentially different events that significantly shaped and influenced the political, social and security reality of the country. In these circumstances, the Agency directed all its capacities towards detecting and eliminating the risks of corruption, which was accompanied by the definition and implementation of measures to manage these risks. Consequently, certain results were achieved related to combating the negative effects of corruption within the functioning of the state and society. They are presented in the Work report, which, in accordance with the Law on the Prevention of Corruption, the Agency regularly submits to the National Assembly of the Republic of Serbia.

The Agency primarily has a preventive role. It exercises its powers by establishing and improving standards of conduct for public officials, strengthening their integrity and insisting on transparency in the performance of public functions, thereby, at the same time, strengthening citizens' trust in public authorities. In the report, we have highlighted the key strategic goals that marked the previous year, which relate to strengthening integrity in the public sector, increasing the level of involvement of society in preventing corruption, implementing anti-corruption regulations, improving international cooperation and the application of international standards in the field of preventing corruption.

Given the fact that corruption is a multi-layered and complex phenomenon, the Agency has paid special attention to raising awareness of the unacceptability of such a phenomenon, which certainly undermines the foundations of society and threatens the basic principle of the Constitution of the Republic of Serbia – that everyone has the right to a place in society in accordance with their knowledge, work and respect for moral norms.

By opening regional units of the Agency in Novi Sad, Kragujevac and Niš, we have achieved even stronger implementation of our competencies, and, more importantly, we have come closer to public officials and citizens of local self-government, enabling them to communicate more directly with us. At the same time, meetings with mayors and presidents of municipalities from more than 80 local government units in 20 administrative districts have shown that the Agency's efforts to constructively implement its preventive role in direct contacts and thus strengthen the already established mechanisms in the fight against corruption are justified and purposeful. There is a clear mutual interest between the Agency and public officials in minimizing possible violations of the Law on the Prevention of Corruption, the Law on Financing Political Activities and the Law on Lobbying. The effects of these discussions are expected in the coming period, when we will analyze the results and compare the situation before and after the aforementioned activities.

The synergy between the Agency as a preventive independent body, on the one hand, and the state as the strongest actor in the uncompromising fight against corruption, on the other, gives way to optimism, which is necessary in building the healthy society we strive for. In addition to the Law on the Prevention of Corruption, public moral condemnation of any form of corruption is also important. In this context, the Agency devoted special attention in the previous year to continuing to improve cooperation with other state bodies, the professional community, international organizations, the

media and civil society organizations, all with the aim of creating a culture of transparency and accountability.

In the year when we mark the decade and a half of the Agency's existence, we are focused on even more dedicated work and are ready to respond to the challenges that lie ahead. Our vision is the further continuous development of the Agency, which will be even more professionally and administratively strengthened and infrastructurally improved, and as such a reliable partner to the state in the implementation of strategic documents in this area.



PRESIDENT OF THE COUNCIL
Stevo Bajić



DIRECTOR
Dejan Damjanović

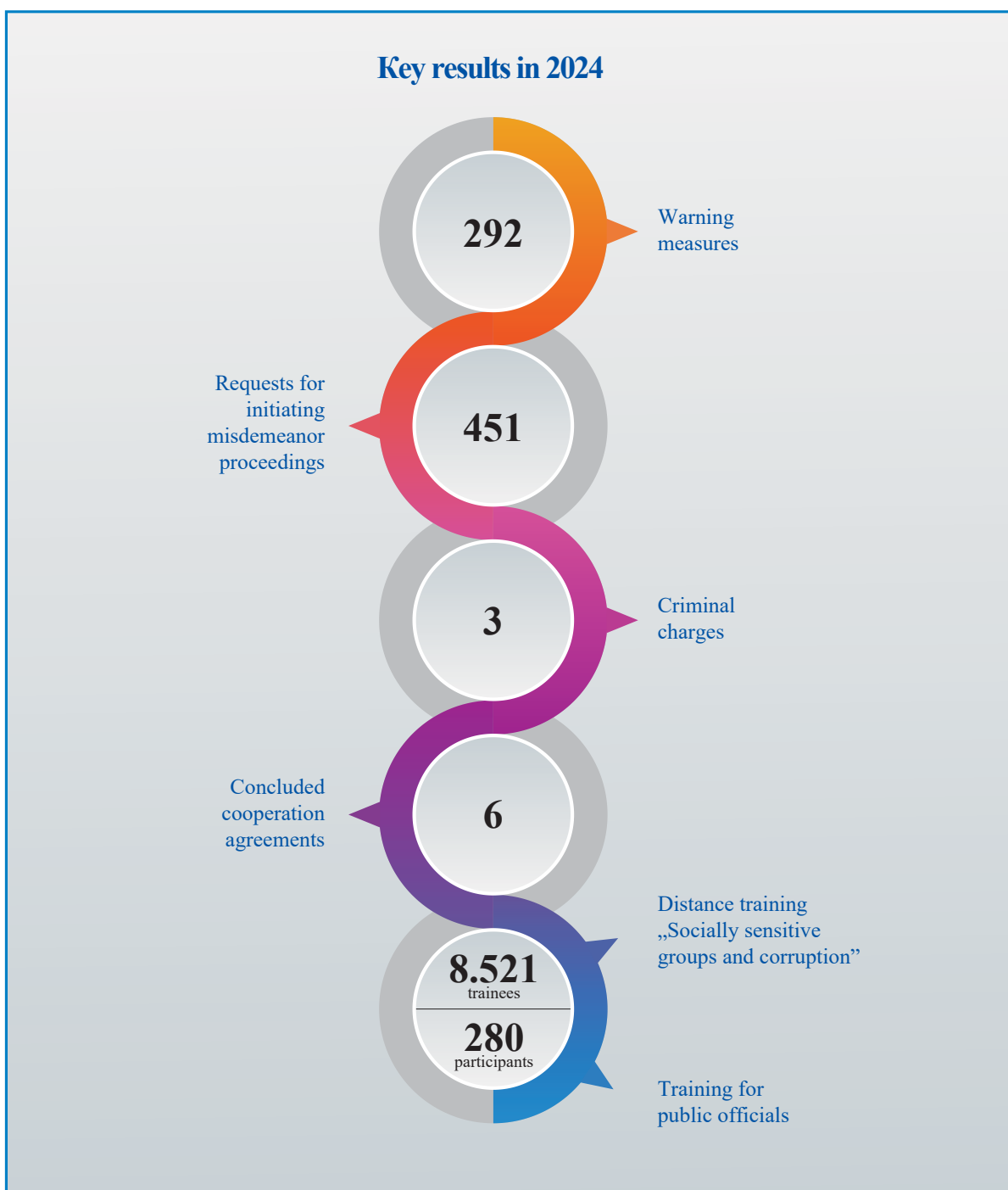
BRIEF OVERVIEW

The Anti-Corruption Agency of the Republic of Serbia (hereinafter: the Agency), as an independent state institution with numerous preventive, control and supervisory powers, during 2024:

- Due to violations of the Law on the Prevention of Corruption, in connection with resolving conflicts of interest, it imposed 73 warning measures, nine measures of public announcement of the decision on the violation of the Law and one measure of public announcement of the recommendation for dismissal from public office. In addition, it issued four decisions on the termination of public office by force of law;
- Resolved 919 requests from public officials for consent to perform another public function, i.e. to perform another job or activity, to become a member of an association, to establish an employment relationship or business cooperation after the termination of public office;
- Issued 346 opinions on the implementation of the Law on the Prevention of Corruption;
- After the local elections scheduled for June 2, 2024, in 67 cities and municipalities and 23 city municipalities in the Republic of Serbia, received 31 reports against public officials, and initiated four ex officio proceedings, due to suspected violations of the provisions of Article 50 of the Law on the Prevention of Corruption. In seven cases, it established violations of the Law on the Prevention of Corruption and imposed warning measures;
- Based on the reports submitted due to suspected violations of the Law on Financing of Political Activities, in connection with the election campaign, the Agency adopted and published a total of 31 decisions on its website. Of the decisions taken, in 10 cases a warning measure was imposed, in two cases a violation of the Law was established – it constitutes a basis for submitting a request to initiate a misdemeanor proceeding, and in 19 cases no violation of the Law was established. In proceedings initiated ex officio, the Agency also adopted eight warning measures;
- Due to violations of the provisions of the Law on Financing Political Activities, it submitted a total of 282 requests to initiate misdemeanor proceedings;
- In the area of reporting, as well as verification of property and income reports, it imposed a total of 203 measures in proceedings initiated during 2024, including proceedings initiated in the previous year, of which 202 were warning measures and one measure of public publication of a decision on a violation of the Law on the Prevention of Corruption;
- Published the Gift Catalog for 2023, which includes 630 protocol and occasional gifts that public officials from 39 bodies of all levels of government received in 2023 in connection with the performance of public duties;
- Through proactive support during 2024, as in previous years, contributed to 99% of taxpayers preparing reports on the implementation of the integrity plan in the third cycle;
- Prepared a report on the supervision of the preparation of the integrity plan, which contains an analysis of all data obtained from individual reports¹ and a total of 207 recommendations related to the improvement of common areas. The most recommendations were given to public enterprises, followed by local governments and health institutions;

¹ The report on the supervision of the development of the Integrity plan in the third cycle 2021–2024 is available on the Agency's website: <https://sn.rs/fcppt> (last accessed: February 2, 2024).

- Enabled 8,563 participants (6,487 women and 2,076 men) to register for the distance learning course “Socially Sensitive Groups and Corruption” in 2024. Of the total number of participants, 8,521, or 99.5%, successfully completed this training;
- As part of the monitoring of the implementation of the Revised Action Plan for Chapter 23 – Subchapter „Fight against Corruption”, prepared the Fourth Implementation Report for 2023, which was submitted to the National Assembly on March 22, 2024;
- Traditionally marking the International Anti-Corruption Day, on December 9, 2024, a ceremonial academy was held at the Military Hall in Belgrade, and on December 10, at the Metropol Hotel, with the support of the OSCE Mission to Serbia, an International Conference entitled „The Power of the Institutional Framework in the Fight against Corruption” was organized.



RECOMMENDATIONS

- It is necessary to implement activities aimed at fulfilling the recommendations of the Council of Europe Group of States against Corruption (GRECO) in the Fifth Evaluation Round, including the adoption of the Law on Amendments and Supplements to the Law on Prevention of Corruption and the Law on Amendments and Supplements to the Law on Lobbying.
- It is necessary to adopt the Law on Amendments and Supplements to the Law on Financing of Political Activities in order to regulate the issues of the actions of third parties (legal and natural persons who are not contributors within the meaning of the Law), with the aim of influencing the election result or the activity of a political entity.



- Authorized proposers of laws should consistently and timely fulfill their obligation to submit draft laws to the Agency, as the state body that provides an opinion on the assessment of the risk of corruption in laws in areas of particular risk for the occurrence of corruption.
- It is necessary to introduce anti-corruption topics into educational curricula with the aim of raising awareness among students in primary and secondary schools in the area of corruption prevention.



THE AGENCY

The Agency is an independent state body which reports to the National Assembly of the Republic of Serbia. Funds for the work of the Agency are provided in the budget of the Republic of Serbia, in a special budget section, and from other sources, in accordance with the law. The annual funds for the work of the Agency in 2024 provided in the budget amounted to RSD 396.553.000.

The headquarters of the Agency is in Belgrade, Carice Milice 1.

The Normative framework of the Agency's actions consists of:

- Law on Prevention of Corruption („Official Gazette of RS”, no. 35/2019, 88/2019, 11/2021 – authentic interpretation, 94/2021 and 14/2022);
- Law on Financing of Political Activities („Official Gazette of RS”, no. 14/2022)
- Law on Lobbying („Official Gazette of RS”, no. 86/2018 and 86/2019);
- Law on Referendum and People's Initiative („Official Gazette of RS”, no. 111/2021 and 119/2021).

In the procedures conducted by the Agency, in accordance with these laws, the law governing the general administrative procedure shall apply.

Within the competencies established by the Law on Prevention of Corruption, the Agency:

1. oversees the implementation of strategic documents, submits a report to the National Assembly on their implementation with recommendations for actions, makes recommendations to the responsible entities on how to eliminate failures in the implementation of strategic documents and initiates amendments to strategic documents;
2. adopts general acts;
3. initiates and conducts proceedings for deciding on the existence of violations of the law and imposing measures in accordance with the law;
4. decides on the conflicts of interest;
5. performs activities in accordance with the law governing the financing of political activities, i.e. the law governing lobbying;
6. submits criminal charges, requests for initiating misdemeanor proceedings and initiatives for commencing disciplinary proceedings;
7. maintains and publishes the Register of Public Officials and the Register of Property and Revenue of Public Officials in accordance with the law;
8. verifies the asset and income statements submitted by public officials;
9. maintains and verifies data from records determined by the law;
10. acts on petitions from natural and legal persons;
11. issues opinions on the application of this Law, acting on its own initiative or at the request of natural or legal persons and takes positions on the implementation of the Law;

12. initiates the adoption or amendment of regulations, issues opinions on the assessment of the risk of corruption in draft laws in the fields of particularly risk of corruption and opinions on draft laws governing issues covered by approved international agreements in the field of prevention and combat against corruption;
13. investigates the state of corruption, analyses the risks of corruption and prepares reports with recommendations to eliminate such risks;
14. oversees the adoption and implementation of integrity plans;
15. adopts training programs and instructions for training in the field of prevention of corruption and monitors the implementation of training in public institutions;
16. performs international cooperation activities in the field of prevention of corruption;
17. performs other tasks specified by the law;
18. applies the law governing the general administrative procedure.

Within the competencies established by the Law on Financing of Political Activities, the Agency:

1. controls the financing of political entities;
2. submits requests for initiating misdemeanor proceedings and imposes reprimands due to violation of the provisions of the law;
3. makes decisions on the loss of the right to funds from public sources;
4. keeps the records of financial statements of political entities;
5. organizes and coordinates the monitoring of election campaigns.

Competences of the Agency established by the Lobbying Act are:

1. training and certification of completed training for lobbyists;
2. keeping the Register of Lobbyists;
3. keeping a Register of Legal Entities Performing Lobbying;
4. keeping special records of foreign natural and legal persons performing lobbying;
5. control of the content and manner of keeping records of public bodies on lobbying contacts of officials elected, appointed, employed or otherwise engaged in that body;
6. imposing measures in the event of violation of obligations of the lobbied person, i.e. the responsible person in the public body, in accordance with the law governing the prevention of corruption, i.e. initiation of disciplinary proceedings;
7. checking the Report on the Work of Lobbyists, i.e. legal entities performing lobbying;
8. submitting a request for initiating misdemeanor proceedings for misdemeanors prescribed by the Law.

Within the authority under the Law on Referendum and People's Initiative, the Agency:

1. announces the name of the organizer of the referendum campaign;
2. publishes reports on the costs of the referendum campaign;
3. controls the reports on the costs of the referendum campaign;
4. submits requests for initiating misdemeanor proceedings due to violation of this Law.

BODIES OF THE AGENCY

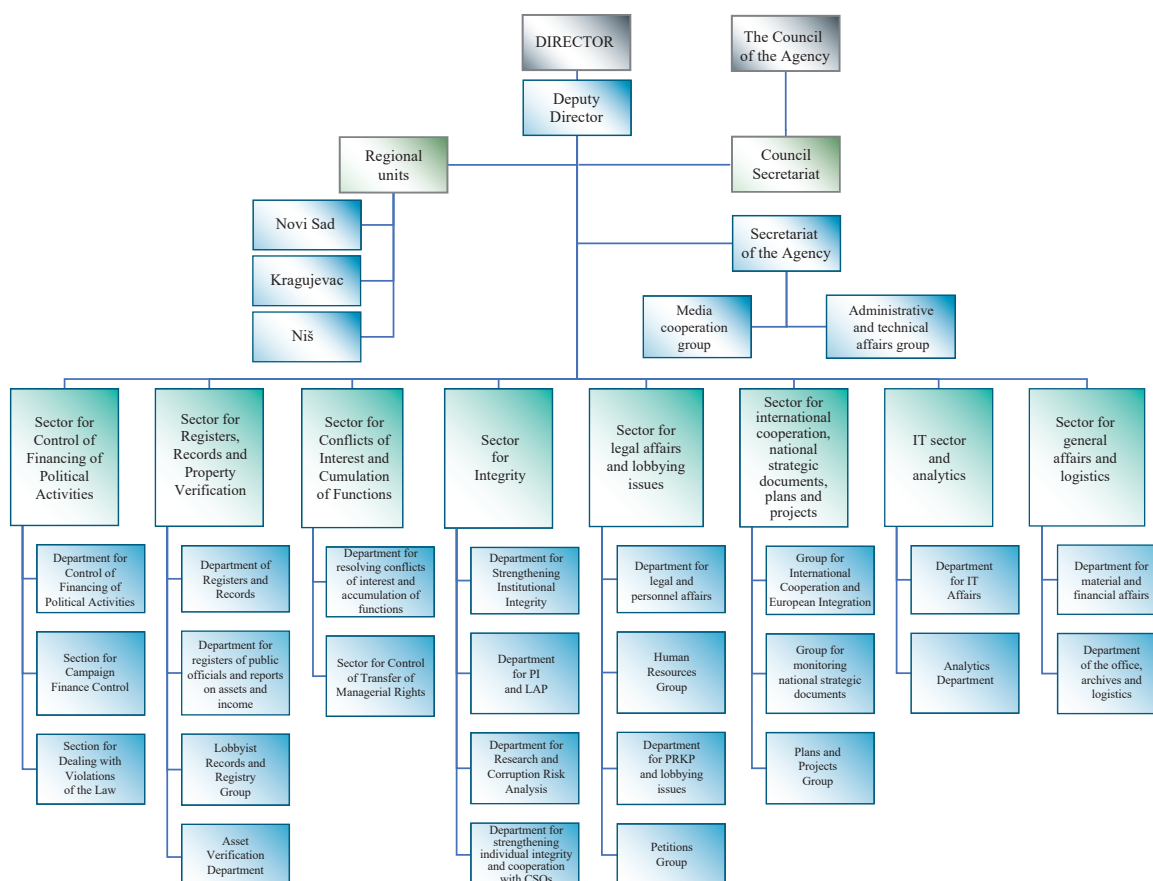
The bodies of the Agency are the Director and the Council of the Agency (hereinafter: the Council).

The Director represents the Agency, manages the work of the Agency's service, decides on requests of public officials in accordance with the Law on Prevention of Corruption, and makes decisions on violations of this law, the Law on Financing Political Activities, the Law on Lobbying and the Law on Referendum Campaign and People's Initiative. The Director is elected by the National Assembly by a majority vote of all deputies after a public competition announced by the ministry in charge of judicial affairs and conducted by the Judicial Academy.

On February 28, 2023, the members of the National Assembly of the Republic of Serbia elected a new Director of the Agency for Prevention of Corruption, Mr. Dejan Damnjanović, graduated at the Faculty of Law, University of Belgrade. This is the first time since the beginning of the Law on Prevention of Corruption that the Director of the Agency was elected through a public competition procedure conducted by the Judicial Academy.

On June 26, 2023, the Director of the Agency for Prevention of Corruption Dejan Damnjanović, after the finalization of the public competition procedure, elected Verka Atanasković, for the Deputy Director.

The Agency has established eight basic units, two special internal units, and three regional units outside the headquarters of the Agency, which ensure efficient and independent work. Departments, divisions and groups were formed as internal units, in sectors as basic organizational units.



The Council decides on appeals against decisions made by the Director in accordance with the Law on Prevention of Corruption, except for decisions on the rights and obligations of employees of the Agency, takes principled positions for the application of the Law, supervises the work of the Director, and monitors his financial situation. The members of the Council were elected by the National Assembly after a public competition announced by the Ministry of Justice and conducted by the Judicial Academy. The constitutive session of the Council, at which the Rules of Procedure of the Council were adopted, was held on March 24, 2021.

The members of the Council are:

- Stevo Bajić, President of the Council, employed by the Agency as a member of the Council;
- Danica Marinković, Deputy President of the Council, Judge of the Court of Appeal in Kragujevac, retired;
- Tamara Mišić, employed by the Agency as a member of the Council;
- Biljana Pavlović, Head of the Cabinet of the President of the Commission for Protection of Competition and Head of Protocol in the Commission for Protection of Competition; and
- Vesna Lazarević, Judge of the Administrative Court in Belgrade, retired.

Members of the Council participate in creating the Agency's policy, cooperate with the Director and take an active part in the implementation of individual activities of the Agency in exercising its competence.

In order to ensure two levels of decision-making, the Council, in accordance with the Law on Prevention of Corruption, decided on appeals against decisions of directors, took legal positions and made decisions on legal issues, as well as other decisions within its competence.

The members of the Council, between the sessions, analyzed the cases in which the rapporteurs and the Council Secretariat employees worked on draft decisions. In complex legal issues they studied the regulations that regulate a certain controversial legal issue in order to take principled legal positions. The Council's supervisory role was realized by considering the written monthly reports that the Director prepared and delivered to the Council, as well as by orally reporting to the Director about the work of the Agency at the Council's meetings.

OVERVIEW OF ACTIVITIES

AND RESULTS

CONFLICT OF INTEREST

The Agency has the authority to prevent and resolve situations of conflict of interest in the performance of public functions. The purpose of preventing and resolving conflicts of interest and the unauthorized cumulating of public functions is to uphold integrity, minimize the risk of abuse, and establish conditions that, even if a conflict of interest appears, record it as such and implement appropriate preventive measures, if deemed necessary. The very awareness of public officials that the Agency controls their work, that their actions can be sanctioned, as well as their exposure to the public eye, contributes to building and improving the regime of integrity, both personal and institutional.

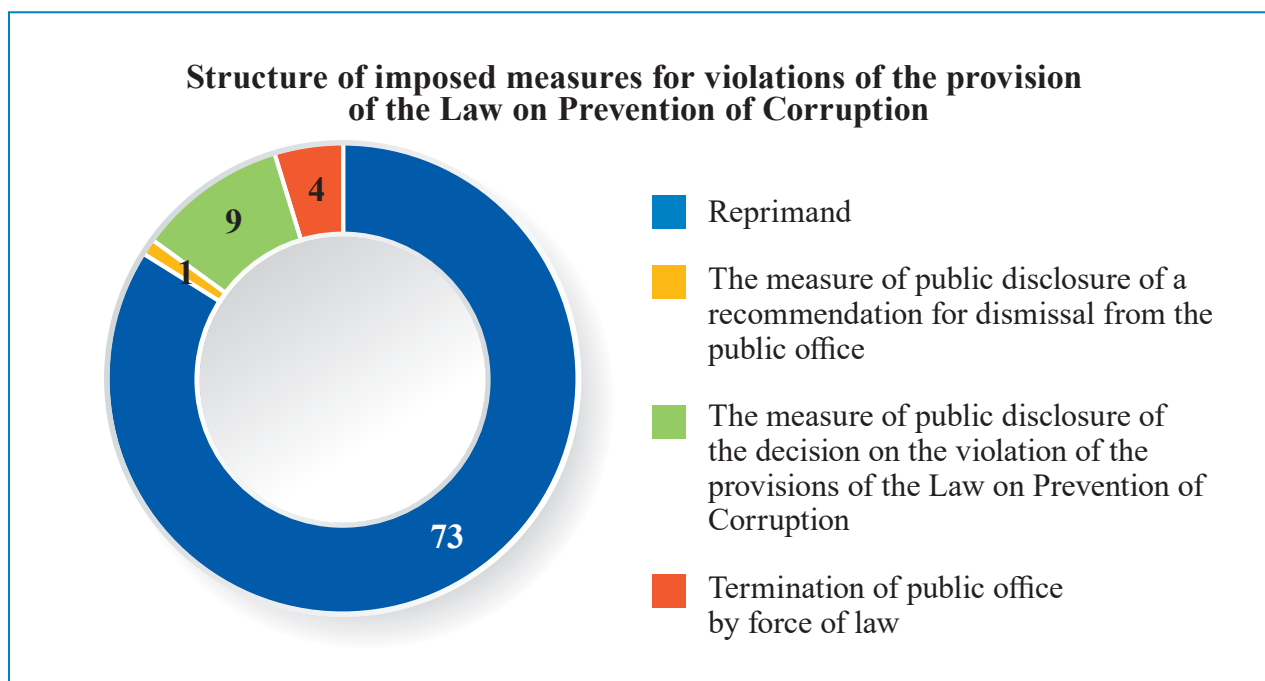


During the year 2024, 919 requests of public officials for giving consent for performing another public function, i.e., for performing another job or activity, for membership in the bodies of the

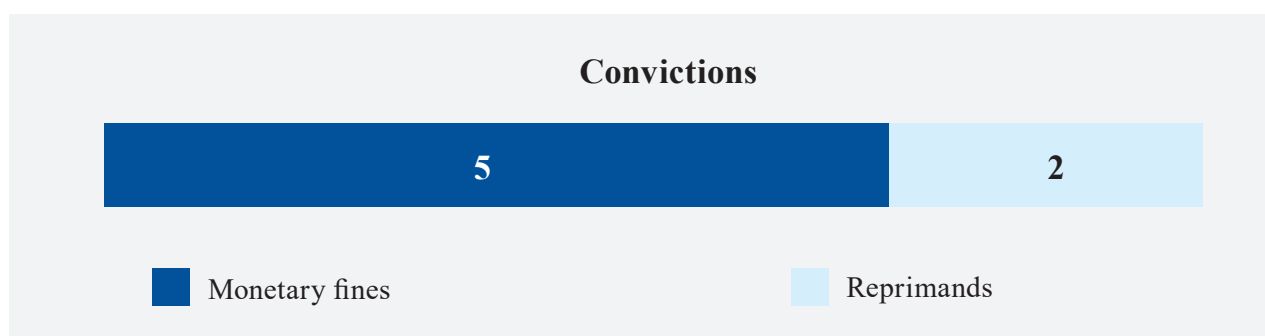
association, for establishing an employment relationship or business cooperation after the termination of the public function – pantouflage – have been resolved in the following way:

- in 719 cases, the Agency has given its consent for the performance of another public office, that is, for the performance of another work or activity;
- 80 decisions were adopted rejecting the request of a public official for consent of the performance of another public function, that is, the performance of another work or activity;
- in 18 cases, the Agency informed the public official about the situation of conflict of interest;
- 102 procedures were completed in another way (by adopting a decision rejecting the request as untimely or non-qualifying, i.e. by adopting a decision on the suspension of the procedure, giving notice that the Agency is not competent and by means of an official note).

Determining the violation of the provisions of the Law on the Prevention of Corruption, the Agency imposed 83 measures and made four decisions on the termination of public office by force of law. In addition, the Agency submitted 12 requests to the competent misdemeanor court for initiating misdemeanor proceedings.



Misdemeanor courts issued a total of 7 decisions, based on requests for initiating misdemeanor proceedings against public officials submitted before and during 2024.



Actions of the Agency during the election campaign – „Officials’ campaign“

After the local elections scheduled for June 2, 2024, in 67 cities and municipalities and 23 city municipalities in the Republic of Serbia², the Agency received 31 reports against public officials, and initiated four ex officio proceedings, due to suspected violations of the provisions of Article 50 of the Law on the Prevention of Corruption.

During the election campaign, due to established violations of the provisions of Article 50 of the Law on the Prevention of Corruption (Articles 2, 4 and 5), public officials were imposed measures in situations where they used public resources for the purpose of publicly representing election participants, used meetings they had in their capacity as public officials and public resources to promote a political party, and did not clearly indicate to their interlocutors and the public whether they were expressing the position of the body in which they perform public office or the position of a political party.

The Agency established violations of the Law on the Prevention of Corruption in seven cases and imposed warning measures.

The Agency's actions during the election campaign:

- in 7 cases, the Agency found violations of the Law on Prevention of Corruption and issued reprimands;
- in 21 cases, the Agency informed the applicants that there is no basis to conduct a procedure for deciding on the existence of a violation of the provisions of the Law on Prevention of Corruption;
- in two cases there were no grounds for conducting the procedure, and the reports were anonymous;
- in one case the report did not relate to a violation of Art. 50 of the Law on the Prevention of Corruption;
- in four procedures, initiated ex officio, no violation of the Law on the Prevention of Corruption was established, and the procedures were concluded with an official note.

2 On June 2, 2024, elections were held for councilors in the city assemblies of: Belgrade, Valjevo, Vršac, Zrenjanin, Jagodina, Kikinda, Niš, Novi Sad, Pančevo, Požarevac, Sombor, Sremska Mitrovica, Subotica, Užice and Čačak; the municipal assemblies of: Ada, Aleksinac, Alibunar, Apatin, Arilje, Bač, Bačka Palanka, Bačka Topola, Bački Petrovac, Bela Crkva, Bеоčин, Bečej, Boljevac, Bosilegrad, Bujanovac, Vrbas, Vrnjačka Banja, Gornji Milanovac, Žablje, Žitište, Ivanjica, Indija, Irig, Kanjiža, Kovačica, Kovin, Mali Idoš, Nova Varoš, Nova Crnja, Novi Bečej, Novi Kneževac, Opovo, Odžak, Pećinci, Plandište, Preševo, Raška, Ruma, Svilajnac, Svrljiga, Senta, Sjenica, Srbobran, Sremski Karlovci, Stara Pazova, Surdulica, Temerin, Titel, Tutin, Čajetina, Čoka and Šid; the assemblies of the city municipalities of the City of Belgrade (Barajevo, Voždovac, Vračar, Grocka, Zvezdara, Zemun, Lazarevac, Mladenovac, Novi Beograd, Obrenovac, Palilula, Rakovica, Savski venac, Sopot, Stari grad, Surčin and Čukarica); the assemblies of the city municipalities of the City of Niš (Niška Banja, Pantelej, Crveni Krst, Palilula, Medijana), as well as in the Assembly of the City Municipality of Kostolac.

Example 1

In proceedings initiated on the basis of a complaint against a public official, previously a member of the municipal assembly, it was established that he acted contrary to the provisions of Articles 40 and 42, paragraph 1 of the Law on the Prevention of Corruption, because during the performance of the said public function he participated in the adoption of a decision establishing a commission, the president of which is the spouse of the public official, who is entitled to a fee for his work in the said commission, the funds for which are provided in the budget of the said municipality, which is adopted by that municipal assembly, and that he did not inform the Agency for the Prevention of Corruption in writing about the conflict of interest he had in the said situation, for which he was imposed the measure of public publication of the decision on the violation of the Law.

REGISTERS AND SPECIAL RECORDS

The Agency, in accordance with its competences, keeps, checks and publishes data from registers and records prescribed by law. The Law on Prevention of Corruption and the Law on Lobbying establish that the Agency keeps:

- Register of Public Officials,
- Register of Property and Revenues of Public Officials,
- Register of legal entities in which a public official or a family member has shares or stocks, which participate in public procurement, privatization, or other procedures, the outcome of which is the conclusion of a contract with a public authority, budget beneficiary, or other legal entity in which the Republic of Serbia, an autonomous province, a local government unit, or a city municipality has shares or stocks;
- Catalog of Gifts,
- Register of Lobbyists,
- Register of Legal Entities Performing Lobbying, and
- Special records on foreign natural and legal persons who carry out lobbying on the territory of the Republic of Serbia.

The above records represent essential instruments of prevention and control in the fight against corruption, as well as in the implementation of the Agency's competence. They are a key element in ensuring the transparency of the work of public authorities and public officials. These records enable clear and precise monitoring of compliance with legal obligations by public officials, and provide a basis for establishing and determining their responsibility, in accordance with the legal framework defined by the Law on the Prevention of Corruption. The establishment of such records not only provides accurate and timely information on which entities are subject to certain obligations, prohibitions and restrictions prescribed by laws and other legal acts, but also enables systematic and comprehensive monitoring of the assets, status and activities of public officials. Efficient, accurate and precise registry keeping is the basis for the implementation of numerous competencies of the Anti-Corruption Agency, including identification and sanctioning of violations of legal norms. Such

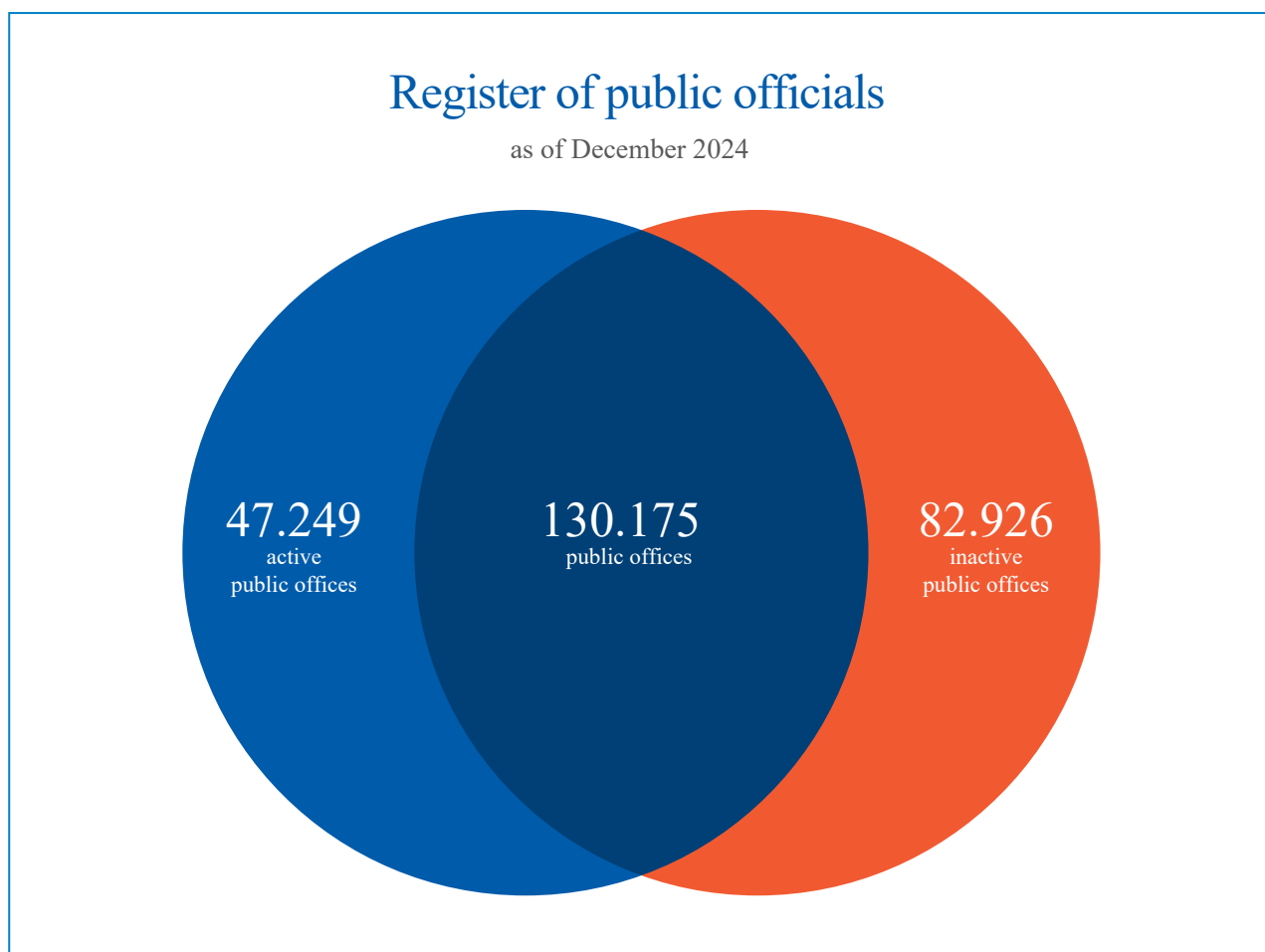
systematic and coordinated application of legal mechanisms makes a strong contribution not only to the fight against corruption, but also to strengthening public trust in the work of institutions and improving the general principle of justice and transparency in the public sector.

The establishment of accurate, precise and complete registers and records and regular updating of data in them is a basic assumption in the procedure for controlling the legality of the performance of public functions.

In addition to the register, the Agency also maintains a Register of Legal Entities in which a public official or a family member has shares or actions. During 2024, five legal entities submitted 314 notifications to the Agency on participation in public procurement, privatization or other procedures.

In 2024, 2,371 public authorities notified the Agency that a public official had assumed public office, or that his or her public office had ceased. The number of processed and verified Notifications on the election, appointment, nomination or termination of public office in 2024 was 25,270.

As of 31 December 2024, the Register of Public Officials registered 130,175 public offices, of which 47,249 were active public offices.



Receipt and verification of reports on assets and income of public officials



Unprocessed reports

Since the establishment of the Agency, as of December 31, 2024, the Register of Property and Income has 8,640 unprocessed reports. Of the 8,640 reports under processing, the largest number are reports from public officials who are not required to submit reports by law, followed by reports from public officials who, according to the Authentic Interpretation of the Law on the Prevention of Corruption, are no longer public officials, public officials whose public office ceased more than 7 years ago, and persons who are not subject to the obligation to submit reports. The first reports submitted to the Agency were manually filled in and retyped, which slowed down the processing process. This number was also affected by the method of submitting reports, as well as the application software, which has been improved compared to 2010. The system has now been upgraded and reports are completed and submitted electronically, which has reduced their processing time.

VERIFICATION OF REPORTS ON ASSETS AND INCOME OF PUBLIC OFFICIALS

One of the most important obligations of public officials is, of course, to submit a report on assets and income, which, in addition to data on the assets and income of the public official, also contains data on the assets and income of the spouse or common-law partner and minor children if they live in the same family home. Part of the data on the assets and income of public officials thus becomes available to the public, which contributes to preserving the integrity of public officials and removing doubts about the conscientious and responsible performance of public office.

The Agency, in accordance with its competences, verifies the timeliness of submission of reports on property and income of public officials, as well as the accuracy and completeness of the data contained in these reports.

The annual inspection plan is adopted by the Director of the Agency, based on the Agency's previous analysis, taking into account the category of public officials, the amount of their income and the amount of financial resources from the budget available to the public authorities in which the public official performs a public function. The Agency may also carry out an extraordinary inspection of the accuracy and completeness of the data in the report, if it suspects that the report does not contain accurate and complete data.

During 2024, the Agency checked the accuracy, completeness and timeliness of the submission of reports for a total of 417 public officials, of which 281 were in accordance with the Annual Inspection Plan for 2024, including inspections that were initiated in previous years, as well as extraordinary inspections.

Due to suspicions that the reports did not contain accurate and complete data, six extraordinary inspections of reports of public officials were also initiated.

In 2024, the verification of property and income reports of 196 public officials was completed.

The annual verification plan covers assistant ministers in the Government of the Republic of Serbia, chief public prosecutors of all basic public prosecutors' offices in the territory of the Republic of Serbia, judges of the Administrative Court, judges of the Commercial Court of Appeal, as well as public officials in independent state bodies.

Due to violations of the Law on the Prevention of Corruption, i.e. delays in submitting property and income reports, reporting inaccurate or/and incomplete data, as well as failure to report significant changes during the performance of public office, the Agency initiated a total of 204 proceedings against public officials at the republican, provincial and local levels of government.

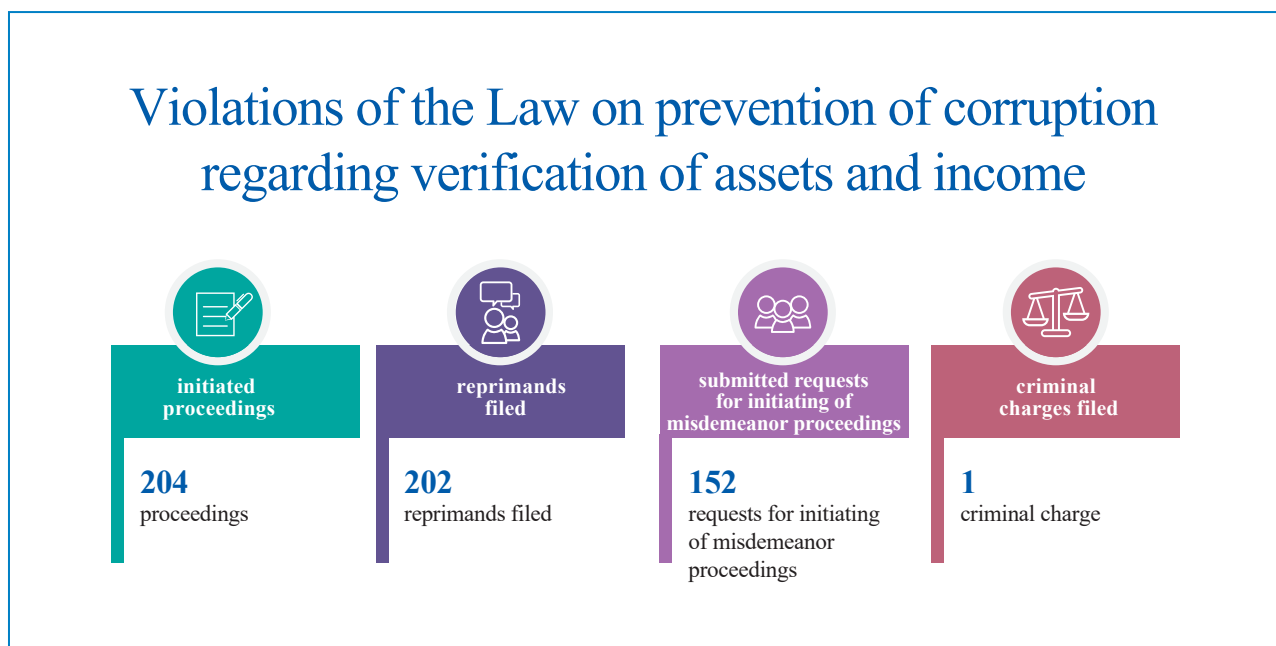
In the proceedings initiated during 2024, including those initiated in the previous year, the Agency imposed a total of 203 measures, of which 202 were warning measures and one measure of public

publication of the decision on the violation of the Law on the Prevention of Corruption. The warning measures were imposed for:

- due to untimely petition of a Report and due to the petition of an incorrect or incomplete Report after election or appointment to public office – 85 measures;
- due to untimely petition of the Report and due to petition of incorrect or incomplete Report upon termination of public office – 63 measures;
- due to untimely petition of the Report on significant changes in assets and incomes during the public office – 11 measures;
- due to cumulative violation of provisions committed by the same public official – 17 measures;
- due to untimely petition of the Notice on the absence of changes in property and income after re-election or appointment to public office – 26 measures.

6 appeals were filed with the Agency Council against decisions of the Agency Director imposing measures on public officials, of which the appeal was rejected in four cases, while two first-instance decisions were annulled.

A total of 131 requests were filed to initiate misdemeanor proceedings for failure to submit reports or notifications within the prescribed period, or for submitting an incorrect or incomplete report.



Misdemeanor courts issued a total of 189 decisions based on requests for initiating misdemeanor proceedings filed before and during 2024.

At the proposal of public officials, against whom the Agency filed requests for initiating misdemeanor proceedings due to untimely submission of reports, the Agency, based on Articles 233 and 234 of the Misdemeanors Act, Article 108 of the Anti-Corruption Act and the Instructions on the Procedure for Concluding a Plea Agreement, concluded five Plea Agreements with the defendants in 2024, which determined fines.

Year	Convictions	Acquittals	Suspended / terminated proceedings
2024	171	4	9
2023	171	0	1
2022	147	2	12
2021	31	1	20

One criminal complaint was filed with the competent prosecutor's office due to the existence of grounds for suspicion that a public official, with the intention of concealing assets and income, did not declare assets and income to the Agency or provided false information on assets and income.

During 2024, the Agency was informed in 19 cases about the outcome of criminal charges and reports filed by the Agency, before and during 2024.

Year	Convictions /Suspended sentences	Indictment filed	Evidentiary actions are under way	Criminal reports were dismissed by applying the principle of opportunity	Criminal reports were dismissed	Acquittals	Criminal proceedings were suspended
2024	1	2	6	4	5	1	0
2023	1	0	8	2	3	0	0
2022	1	2	12	1	3	2	1
2021	3	0	24	2	10	1	1

GIFTS

A gift is a thing, right or service given or provided without appropriate compensation, i.e. a benefit or convenience provided to a public official or a family member. A public official and a family member may not accept a gift in connection with the performance of a public function, with the exception of a protocol and an occasional gift. Gifts received become public property, in accordance with the law governing public property. The Law on the Prevention of Corruption stipulates the conditions under which a public official may retain a gift.

A public official is obliged to notify in writing the public authority in which he holds a public office, which keeps the Records of gifts received by public officials and members of their families, and which is obliged to submit a copy of the Records to the Agency

Based on the records received, the Agency maintains and publishes the Catalogue of Gifts of Public Officials. The Catalogue of Gifts for 2023 includes 630 protocol and occasional gifts received by public officials from 39 bodies at all levels of government in 2023 in connection with the performance of public duties.

In the reporting period, the most gifts were reported by the General Secretariat of the President of the Republic (136) and the Ministry of Defense (129).

The Agency has also prepared a Statistical Analysis of the Catalogue of Gifts Reported for 2023, which includes statistical processing of data from the Catalogue of Gifts, taking into account its most important elements, as well as their comparison with previous years.

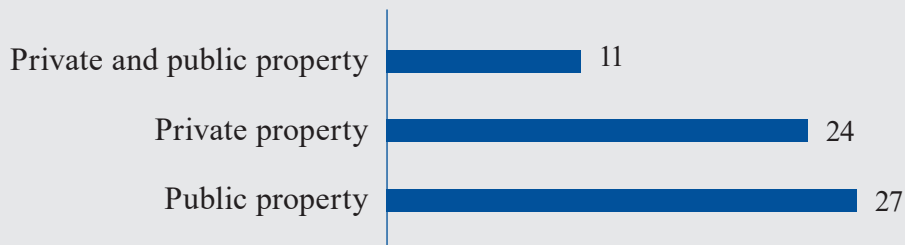
The statistical analysis of the Gift Catalogue for 2023 shows: the number of gifts by year and month, the distribution of gifts by type, level of government, range of estimated value and property regime, a list of bodies that submitted records, a list and gender dimension of public officials who received gifts and an overview of reported gifts.

Of the total number (630) of gifts received in connection with the performance of public office, there were more protocol gifts (424) than occasional gifts (206). Of this number, 438 were transferred to public property, while public officials retained 192 gifts. The largest number of gifts was transferred to public property by the President of the Republic (136), and observed by type of public office – by ministers (143). When it comes to gifts kept as personal property, the most gifts were kept by ministers, who kept a total of 62 gifts, followed by state secretaries with 34, as well as assistant ministers and directors with 29 gifts each.

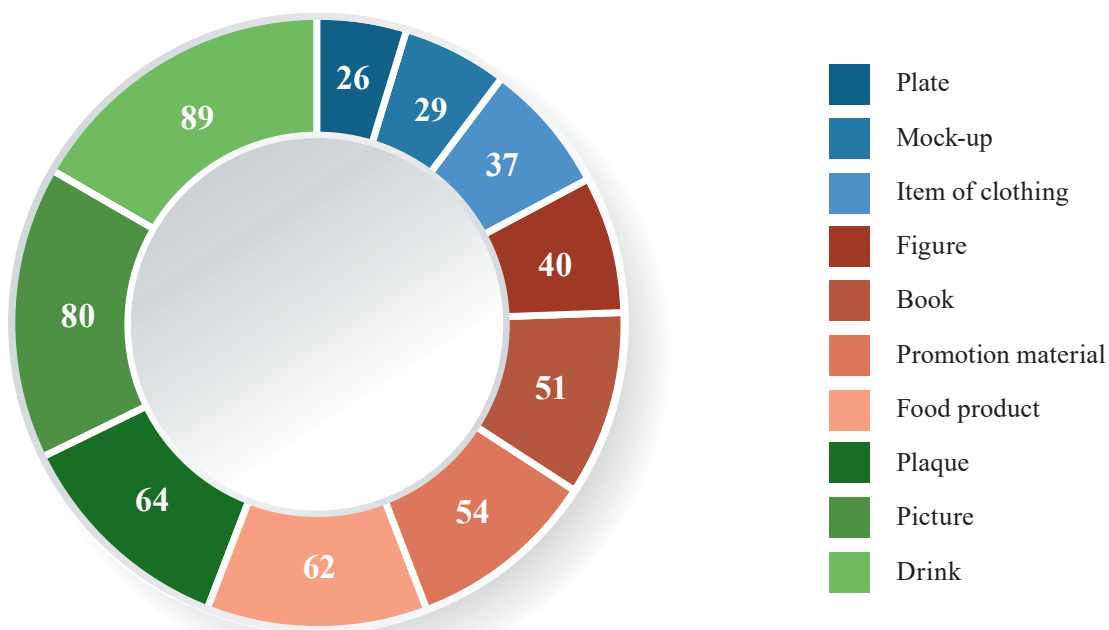
The value of the gifts ranges from 0.00 to 1,500,000.00 dinars, while the estimated monetary value of the largest number of gifts is in the range of 0.00 to 3,000.00 dinars. For 63 gifts, the monetary value had not been estimated by the time the analysis was conducted.

The characteristic conclusions contained in this analysis can be viewed on the Agency's website: https://www.acas.rs/cyr/page_with_sidebar/istrazivanja#

The relationship between public officials and the gift property regime



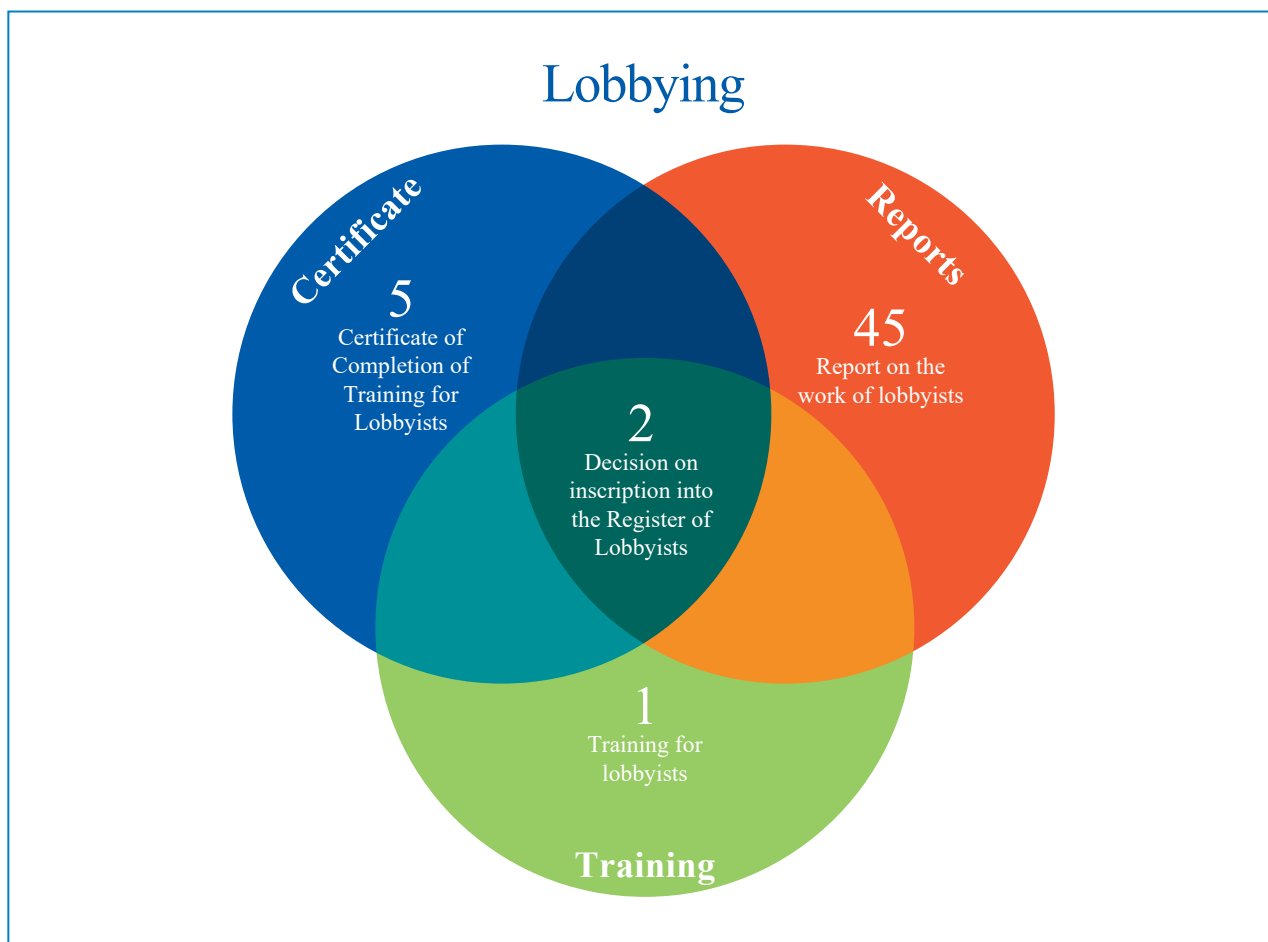
Type of gifts received



The characteristic conclusions contained in this analysis can be viewed on the Agency's website: https://www.acas.rs/cyr/page_with_sidebar/istrazivanja

LOBBYING

Lobbying is an activity aimed at exerting influence on the authorities of the Republic of Serbia, the autonomous province, the local self-government units, the bodies of holders of public powers whose founder is the Republic of Serbia, the autonomous province or a local self-government unit – the government authorities that participate in passing laws, other regulations and general acts from the purview of said authorities, for the purpose of achieving the interests of the users of lobbying.



In 2024, the Agency held one training course for lobbyists, which was attended by six candidates. After completing the training and checking their knowledge of the content of the Training Program, five candidates received a Certificate of Completion of Lobbyist Training. Two decisions on entry into the Register of Lobbyists and four decisions on deletion from the Register of Lobbyists were issued, as well as one decision on deletion from the Register of Legal Entities Engaging in Lobbying. As of December 31, 2024, a total of 47 persons were entered in the Lobbyist Register.

The Agency received 45 Reports on the work of lobbyists for 2023, of which three were reports from legal entities that conduct lobbying, as well as three extraordinary reports on the work of a lobbyist. The Agency received one notification from a lobbyist about the first lobbying contact, as well as nine records from public authorities about lobbying contacts of a lobbyist.

During 2024, the Agency also held six training courses for lobbyists, including the segment of the protection of the EU's financial interests, one of which was intended for officials in the highest executive positions under the title "Standards of Integrity of Public Officials through the Legal and Institutional Framework for Preventing Corruption", while the others were intended for officials and employees in local government units in Novi Sad, Subotica, Niš, Kragujevac and Novi Pazar.

ANALYSIS OF THE RISK OF CORRUPTION IN REGULATIONS

The Agency initiates the adoption or amendment of regulations, issues opinions on the assessment of the risk of corruption in draft laws in the fields of particularly risk of corruption and opinions on draft laws governing issues covered by approved international agreements in the field of prevention and combat against corruption.

During 2024, the Agency held six training sessions on the topic of assessing the risk of corruption in regulations for authorized proposers of regulations, including the protection of the EU's financial interests, where, among other things, participants were introduced to the application of the Methodology for assessing the risk of corruption in regulations. One of the aforementioned training sessions was held for public officials in the highest executive positions, while the other training sessions were intended for public officials and employees in local government units in Novi Sad, Subotica, Niš, Kragujevac and Novi Pazar.

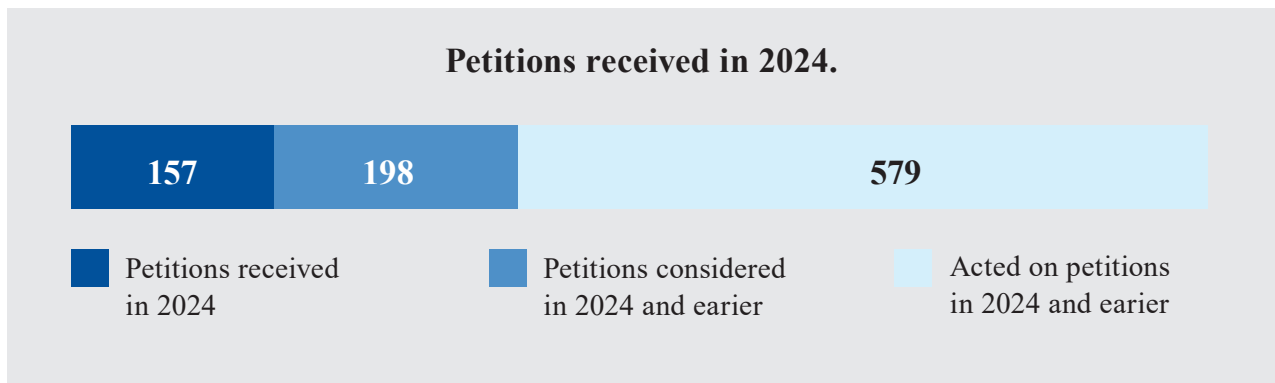
In 2024, the Agency, applying the Methodology for Assessing the Risk of Corruption in Regulations, submitted an initiative to amend the Regulation on the Allocation of Grants within the Competitive Agriculture Project („Official Gazette of the Republic of Serbia” No. 104/23). The Agency submitted the aforementioned initiative after analyzing the allegations in the received complaint, which indicated that the ranking list of grant beneficiaries within the Competitive Agriculture Project, which is implemented on the basis of the Law on the Confirmation of the Loan Agreement between the Republic of Serbia and the International Bank for Reconstruction and Development („Official Gazette of the Republic of Serbia-MU”, No. 2/20), was determined without clear criteria, in a manner that was insufficiently transparent, thus calling into question the basis for acquiring the funds in question, in the procedure in which the Regulation on the Allocation of Grants within the Competitive Agriculture Project („Official Gazette of the Republic of Serbia”, No. 30/21) was applied. An analysis of the success of this initiative of the Agency will be carried out after acting on the Agency's initiative, i.e. after amending the Regulation on the Allocation of Grants within the Competitive Agriculture Project.

PROCEEDING ON PETITIONS

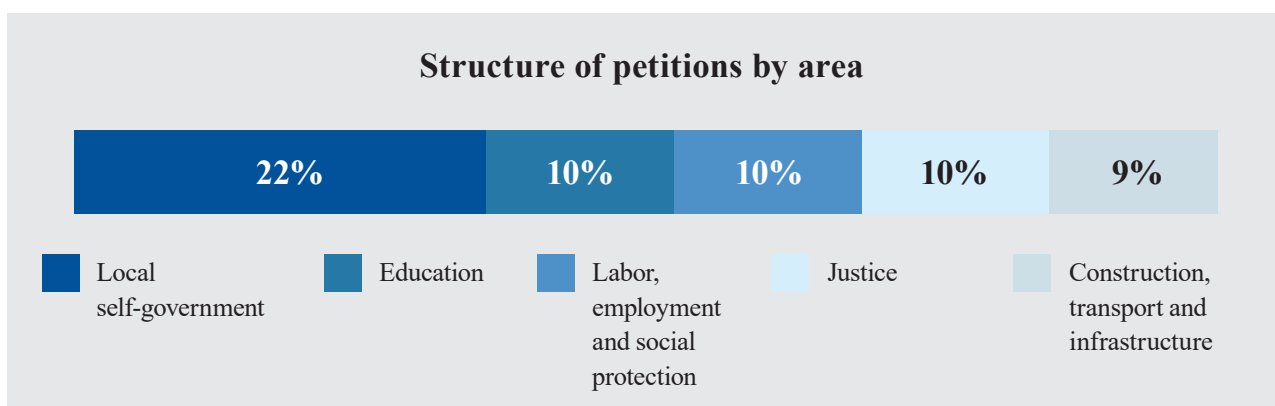
By submitting complaints to the Agency, individuals and legal entities are enabled to present facts that raise suspicions of corruption and inform the Agency about certain irregularities in the work of public authorities. When acting on complaints, the Agency assesses the complaints, checks the merits of the complaint through the competent authorities or independently, collects the necessary information and evidence, analyzes the complaint and informs other organizational units of the Agency and public authorities about the analysis, submits appropriate applications and reports to the competent authorities and informs the complainant about the outcome of the procedure.

Of the total number of complaints received (157), as many as 48 complaints, or 30.57%, were filed by unidentified persons.

The largest number of all submitted complaints related to the competences of inspection bodies and prosecutors' offices, to which the Agency forwarded the complaints for processing, while protecting the identity of the complainants, as prescribed by the Law on the Prevention of Corruption.



In the reporting period, proceedings in 215 cases from 2024 and previous years were terminated because it was determined that there was no evidence for the allegations in the complaints or that the allegations were unfounded. Three proposals were submitted for supervision of the public authority to which the complaint relates, one recommendation was made to the public authority with measures to remedy the situation, and two criminal charges were filed against three persons based on the allegations in the complaint.



In the structure of new complaints, the most numerous are from the areas of state administration and local self-government (21.66%), education (10.19%), labor, employment and social policy (9.55%), justice (9.55%) and construction, transport and infrastructure (8.92%).

Given that the records of complaints by area are kept based on the predominant content of the complaint, as well as the fact that the largest number of complaints relate to more than one area, it should be noted that in a large number of complaints, the area of public procurement appears as the second area.

CONTROL OF THE FINANCING OF POLITICAL ACTIVITIES

Control of financing of political entities and monitoring of money flows in politics represents an essential step in ensuring transparency and fighting corruption.

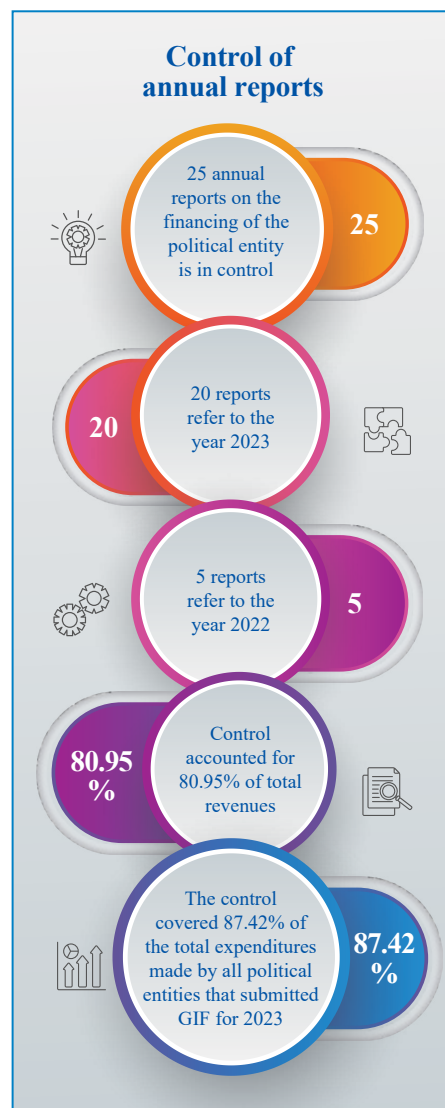
By applying the competences given within the Law on the Prevention of Corruption and the Law on Financing of Political Activities, the Agency carries out control of both the regular work of political entities and election campaigns. In accordance with that, political subjects are obliged to provide the Agency with data on collected and spent funds as part of annual financial reports, as well as reports on election campaign expenses (preliminary and final reports).

The Agency controls the collected data by cooperating with state administration bodies, local self-governments, banks, service providers, and other relevant institutions at all levels.

In the previous year, the Agency controlled annual reports on the financing of political entities, which all registered political parties and citizen groups that have representatives submitted to the Agency by April 30th of the current year for the previous year. These reports contain data on contributions and assets, that is, data on the origin, amount, and structure of all funds collected and spent from public and private sources, credits, and loans.

The legal obligation to submit the Annual Financial Statement for 2023 was fulfilled by 275 political entities, of which 120 are political parties and 155 groups of citizens.

An annual financing report was submitted by 174 political entities, of which 81 political parties and 93 groups of citizens.

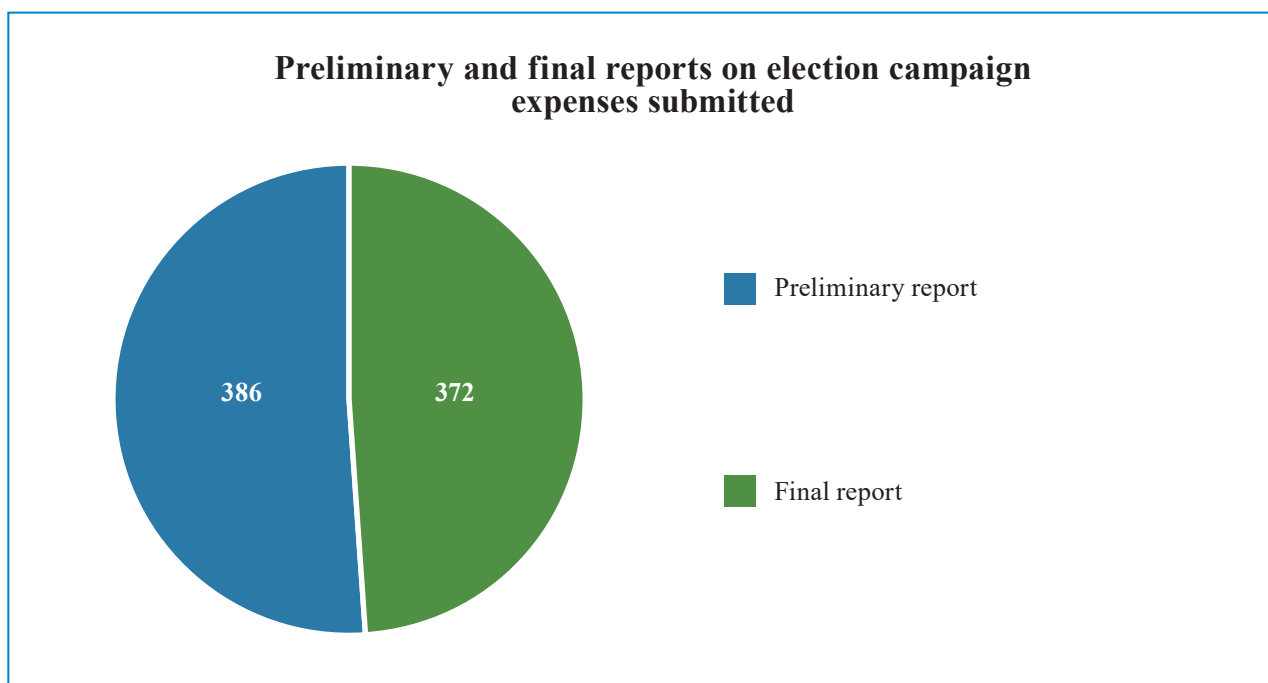


The Agency, through the control of annual financing reports (GIF), covered the reports of 25 political entities, 20 of which relate to 2023, and five to 2022. The control of annual financing reports for 2023 covered 80.95% of total revenues and 87.42% of total expenditures incurred by all political entities that submitted GIFs for 2023.

The criteria for the control of annual reports on the financing of political entities, which are determined by the control plan, are determined as follows: the control of annual reports on the financing of political entities for 2023, which were submitted on Form I-1 in accordance with the Rules, political entities with the highest reported income and expenses in 2023, political parties that have their representatives in parliament, political parties that were subject to control by the State Audit Institution, and for which notifications were submitted to the Agency using the random sample method.

The results of the control of annual reports on financing are published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti, in the form of the Report on the Control of Annual Reports on the Financing of Political Entities for 2023.

Political entities with declared electoral lists in the above elections were obliged to submit to the Agency a preliminary report on election campaign expenses, which refers to the period from the date of calling the elections to 15 days before the day set for voting, within seven days before the date of the election. Political entities were obliged to submit a final report on election campaign expenses within 30 days from the date of publication of the overall report on election results.



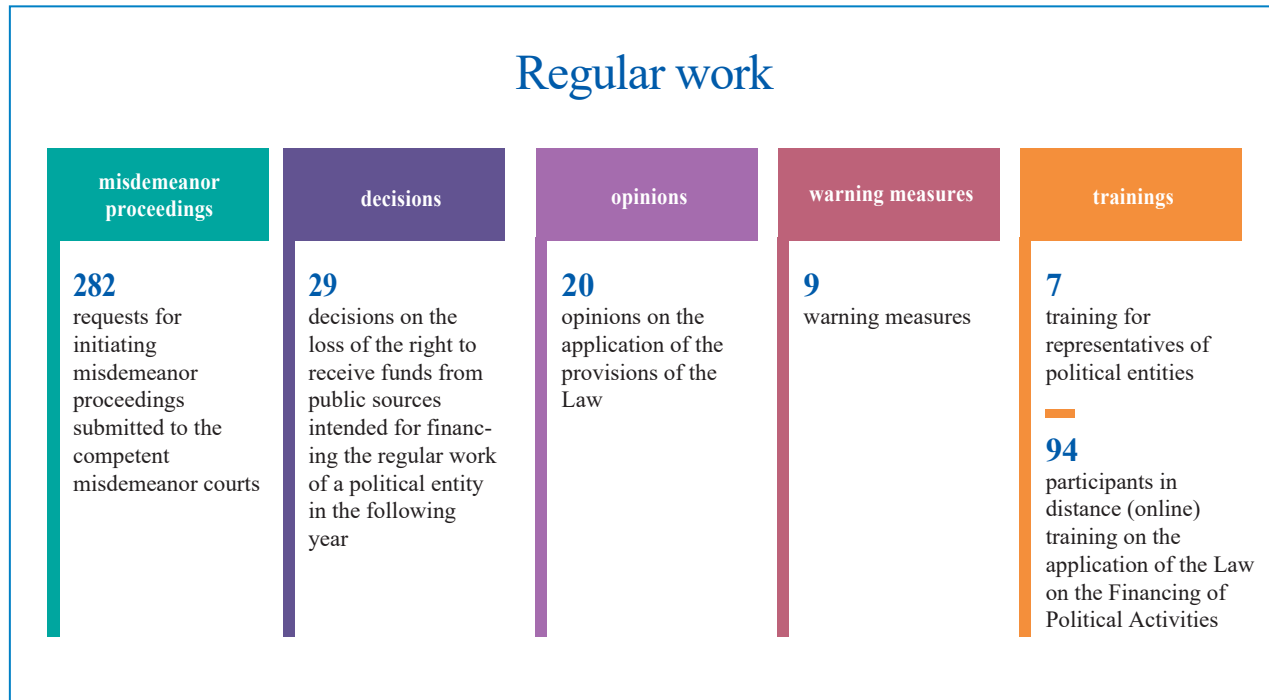
405 political entities had the legal obligation to submit a preliminary and final report on election campaign expenses. 372 political entities, or 91.85%, submitted a preliminary report, while 386 political entities, or 95.30%, submitted a final report.

In 2024, the Agency carried out control of the submitted reports on election campaign expenses, both for the elections held in 2023 and for the elections held in 2024. The control of these reports was carried out in accordance with the plans for the control of election campaign expenses for 2023 and 2024, which were published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/izbori.

The control of election campaign expenses, i.e. the income and expenses of political entities, includes formal and substantive control, which involves cross-checking the data submitted by political entities with data collected from commercial banks, legal and natural persons, service providers, state and other authorities, as well as data collected from the Agency's observers. The Agency's control of election campaign expenses included reports from 97 political entities, of which 50 reports relate to 2023 and 47 to 2024. The results of the control of election campaign expense reports for the elections held in 2023 and 2024 are published on the Agency's website in accordance with the Law https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti.

Also, in order to increase the transparency of financing election campaign expenses for the elections for members of parliament, members of parliament in the Autonomous Province of Vojvodina and the City of Belgrade held in 2023, the Agency has compiled and published on the website an Analysis of Preliminary Expenditure Reports for these elections https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti.

In addition to analyzing the sources of funding and election campaign expenses of controlled political entities, the reports contain an overview of observed irregularities and possible violations of the Law on Financing of Political Activities, as well as data on requests submitted for initiating misdemeanor proceedings before the competent court and proceedings initiated before the Agency.



Based on final judgments imposing a fine, 29 decisions were made on the loss of the right to receive funds from public sources intended for financing the regular work of a political entity in the following year (The decision on the loss of the right to receive funds from public sources is made on the basis of a final judgment of a misdemeanor court imposing a fine, and if the political party, or group of citizens, has representatives in representative bodies). These decisions were published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti

Acting on the requests of political entities, the Agency issued 20 opinions on the application of the provisions of the Law.

In accordance with the provisions of the Law, the Agency informed the Tax Administration of the Republic of Serbia about the donors of contributions to political entities in 2023, which are contained in the annual Reports on Financing of Political Entities, as well as Reports on Election Campaign Expenses of Political Entities, which were the subject of control.

The Agency held seven trainings for representatives of political entities on the topic of „Implementation of the Law on Financing of Political Activities and Submission of Annual Reports on Financing and Reports on Election Campaign Expenses”. Also, 93 participants successfully completed the distance (online) training on the topic of the implementation of the Law on Financing of Political Activities.

Due to violations of the provisions of the Law on Financing of Political Activities, the Agency filed a total of 282 requests for the initiation of misdemeanor proceedings, as follows:

- 130 requests for failure to submit preliminary reports on election campaign expenses;
- 87 requests for failure to submit final reports on election campaign expenses;
- 55 requests for failure to submit an annual financing report;
- four requests because the final report on election campaign expenses did not present all data;
- two requests for failure to use at least 5% of funds received for regular work from public sources for professional development and work with membership;
- four requests for other violations of the Law.

Procedures related to the election campaign

During 2024, (June 2),³ elections were held for the election of councilors in city assemblies, city municipal assemblies of the City of Belgrade, city municipal assemblies of the City of Niš, and the City Municipal Assembly of Kostolac.

For the ninth time since its establishment, the Agency organized and conducted monitoring of the election activities of political entities that participated in the aforementioned elections. For the purposes of monitoring, 44 field observers were engaged in several cities in the Republic of Serbia.

Three central coordinators from among the Agency's employees were also engaged to monitor and control the work of field observers.

³ The list of cities and municipalities in which elections were conducted can be found on page 18

Based on the reports filed regarding suspected violations of the Law on Financing of Political Activities, in connection with the election campaign for the elections held on June 2, 2024, the Agency adopted, and published on its website, 31 decisions. Of the decisions made, in 10 cases a warning measure was imposed, in two cases a violation of the Law was established and constitutes the basis for submitting a request to initiate a misdemeanor proceeding, and in 19 cases no violation of the Law was established.

In addition, in the reporting period, the Agency made 10 decisions on reports related to the 2023 election campaign, of which in two cases a warning measure was imposed, in one case a violation of the Law was established, while in seven cases no violation of the Law was established.

Also, the Agency, based on the procedures it initiated ex officio, i.e. based on the reports of observers it engaged during the 2023 and 2024 election campaigns, issued a total of 17 decisions imposing warning measures, nine of which related to the 2023 election campaign, and eight related to the 2024 election campaign.

All decisions were published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/izbori.

STRENGTHENING INTEGRITY

The two key anti-corruption mechanisms for strengthening institutional and personal integrity that the Agency applies are the Integrity Plan and Ethics and Integrity Training.

By analyzing corruption risks, which is the first step in developing an integrity plan, institutions identify critical points in their functioning. Developing and implementing an integrity plan, i.e. defining adequate measures for managing the identified risks and implementing the plan itself, contributes to improving institutional efficiency and ensuring transparent and accountable functioning of the institution.

Ethics and integrity training improves professional standards of conduct of managers and employees in public authorities, encouraging ethical behavior, responsibility and awareness of corruption risks.

Consistent implementation of these preventive mechanisms affects the preservation of integrity, institutional sustainability and increasing citizens' trust in the work of institutions.

INTEGRITY PLAN

The development and implementation of an integrity plan is a key component in the systematic introduction of good governance mechanisms into the work of institutions, reducing potential and real risks of corruption and enabling the efficient functioning of institutions in the public sector

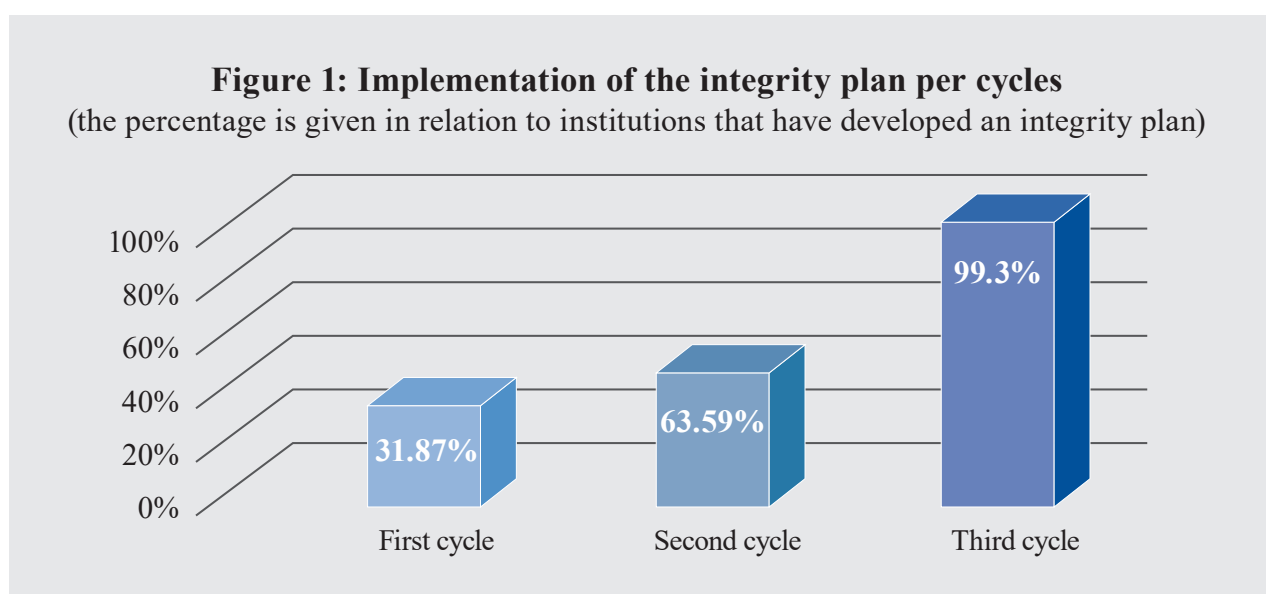
An integrity plan is a preventive mechanism that includes a self-assessment of the risks of corruption and other irregularities, i.e. an analysis of the work of the institution, defining and implementing measures to eliminate the identified risks. The developed integrity plans provide significant information on the state of integrity in the public sector, identifying common and systemic problems in individual areas. After each cycle, the Agency analyzes the developed/implemented plans and makes recommendations for improvement

An integrity plan is a document that requires periodic review in accordance with changes at the normative, institutional, organizational and personnel levels within and outside the institution. One cycle of developing and implementing an integrity plan lasts three years. During the first year, institutions analyze corruption risks and define measures to manage them, while in the following two years, these measures are implemented. Three cycles have been completed so far.

In the third cycle, 2,965 (99.87% of 2,969) institutions fulfilled the obligation to develop an integrity plan, and 99.22% of them reported to the Agency on the implementation of the measures.

Reporting on the implementation of the integrity plan

Compared to previous cycles, the number of institutions that implemented their integrity plans increased significantly in the third cycle, as shown in Figure 1.



In 2024, 99.22% (or 2,942 out of 2,965 that developed an integrity plan) reported to the Agency on its implementation, and Table 1 shows the institutions that fulfilled the legal obligation by system.

Name of the system	Number of institutions that have developed an integrity plan	Number of institutions that have reported on the implementation of an integrity plan	Percentage
Political system	43	43	100%
Justice system	163	163	100%
Police system	43	43	100%
State administration and local self-government system	169	162	95.86%
Defense system	19	17	89.47%
Public finance and economy system	125	124	99.20%
Agriculture system	14	14	100%
Social policy system	78	78	100%
Health system	315	310	98.41%
Education and science system	1,593	1,589	99.75%
Culture and sports system	75	75	100%
Environment and spatial planning system	11	11	100%
Data protection, human rights and public interest system	9	9	100%
Public enterprise system	308	304	98.70%
TOTAL	2,965	2,944	99.3%

Report on the Self-Assessment of Integrity of Public Authorities in the Republic of Serbia Based on the Developed Integrity Plans

The Report on the Self-Assessment of Integrity of Public Authorities in the Republic of Serbia is based on the analysis of data from the developed integrity plans, identifying areas that are functioning well, as well as those that are exposed to risks of corruption and other irregularities. The first part of the report, entitled National Integrity, includes the analysis of data from all institutions that have developed an integrity plan, with a conclusion and recommendations. The second part refers to the analysis of data by systems (14 systems). First, common areas (Ethics and Personal Integrity, Human Resources Management, Public Finance Management and Information Technology (IT) Security) are addressed, followed by specific areas.

Some of the weaknesses observed in the functioning of public sector institutions in all systems are: unregulated area of ethical conduct of employees (conflict of interest and acceptance of gifts), unregulated handling of financing from EU funds and other international funds, as well as unregulated area of information security. Deficiencies were also observed in the needs analysis that precedes the preparation of the financial plan and the act on systematization. Weaknesses in the employment procedure are present in institutions that only perform an oral check of candidates' competencies (48.47%), allow candidates only to see the documentation (13.34%), as well as in 5.74% that do not conduct any check.

Frequent changes to the act on systematization, public procurement plan and annexation of public procurement contracts are present in all systems. In the area of public financial management, institutions that have not established adequate mechanisms for monitoring and controlling work processes stand out (e.g., internal audit was established by 39.31% of institutions)⁴.

Report on the conducted monitoring of the quality and objectivity of the integrity plans developed in the third cycle

The integrity plan is developed by the institutions themselves analyzing and assessing the risks of corruption and is therefore subject to the subjective assessment of the working group and employees participating in its development. The Agency, in accordance with the law, monitors the quality and objectivity of the developed integrity plan. After the deadline for developing the integrity plan⁵ in the third cycle expired, the Agency conducted monitoring in 16 institutions⁶ from different systems in seven cities⁷ and prepared individual reports with recommendations. In 2024, a consolidated report on the conducted supervision was also prepared, containing an analysis of all data obtained from

4 A detailed analysis is provided in the Report on the Self-Assessment of the Integrity of Public Authorities in the Republic of Serbia, which is available on the Agency's website: (accessed: 2 March 2025).

5 The deadline for the development of the integrity plan in the third cycle was 31 December 2022

6 In 2023, direct supervision covered the following systems and institutions: Political system (3 institutions): Ministry of Sports, Ministry of Culture and Ministry of Human and Minority Rights and Social Dialogue; Judicial system (2 institutions): Basic Court in Arandjelovac and Basic Court in Negotin; State administration and local self-government system (3 institutions): City of Loznica, Municipality of Vrnjačka Banja and Municipality of Ivanjica; Health system (3 institutions): Health Center Arandjelovac, Public Health Institute Vranje and General Hospital Loznica; Education and Science system (2 institutions): Primary School „Jovan Jovanović Zmaj” from Vranje and Primary School „Vuk Stefanović Karadžić” from Negotin; Public Enterprise System (3 institutions): PE „Belimarkovac” from Vrnjačka Banja, PE „Vodovod” from Vranje and PUC Ivanjica.

7 Belgrade, Vranje, Arandjelovac, Negotin, Vrnjačka Banja, Ivanjica and Loznica.

individual reports obtained from individual report⁸ and a total of 207 recommendations related to the improvement of common areas. The most recommendations were given to public enterprises, followed by local governments and health institutions.

Integrity Plan Training

For a high-quality and objective development of an integrity plan, it is essential that managers and employees understand the purpose of developing and implementing this preventive mechanism and its impact on strengthening institutional integrity.

During 2024, the Agency organized four trainings for heads of institutions „The Manager as a Driver of Building Institutional Integrity”.

With the support of the OSCE Mission to Serbia, four trainings were also conducted with representatives of local governments, education, healthcare, justice, social policy and public enterprises aimed at improving the content of the draft integrity plan for the fourth cycle „The Importance of Developing an Integrity Plan and Developing the Content of the Draft for the Fourth Cycle”.

At the invitation of the Ministry of Internal Affairs, the Republic Pension and Disability Insurance Fund and the National Academy for Public Administration, three trainings were held on the integrity plan and the assessment of the risk of corruption in an institution.

A total of 292 participants (112 men and 180 women) were trained on the concept, importance and method of developing an integrity plan, assessing the risk of corruption and other irregularities in an institution. Of these, 102 managers (49 men and 53 women) improved their knowledge and understanding of their powers and responsibilities in the process of developing and implementing an integrity plan, as well as in creating an organizational culture in the institutions they manage. A brochure was produced for the training, emphasizing the importance of developing and implementing this mechanism, as well as the role of managers in promoting the values of public administration and building the integrity of an institution.⁹

8 The report on the supervision of the development of the integrity plan in the third cycle 2021–2024 is available on the Agency's website: <https://sn.rs/fcpt> (last accessed: February, 2 2024).

9 The brochure was produced with the support of the OSCE Mission to Serbia.

Example of good practice

In order to improve the content of the draft integrity plan for the fourth cycle, the Agency began work on the analysis of work processes exposed to risks of corruption and other irregularities. During October and November 2024, workshops were held in Belgrade, Kragujevac, Niš and Novi Sad, with eight working groups consisting of representatives of the Political System, the Judicial System, the State Administration and Local Self-Government System, the Education and Science System, the Health System, the Social Policy System and the Public Enterprise System.



63 institutions responded to the Agency's invitation with 71 participants who contributed with active participation and concrete proposals.

The identified risk processes and their content will be an integral part of the draft integrity plans that these systems will use in the fourth cycle of its development and implementation.

LOCAL ANTI-CORRUPTION PLAN (LAP)

The Local Anti-Corruption Plan¹⁰ (LAP) is designed as a preventive anti-corruption mechanism. The purpose of this document, namely its development, adoption, effective implementation and monitoring, is to make local self-government units (LSG) more resilient to corruption risks that exist within the framework of which local self-government exercises its competences.

This mechanism includes processes related to the development/adoption of the LAP, the implementation of the LAP, as well as monitoring/reporting on the implementation of the LAP.

The Agency has an obligation¹¹ to collect data on the adoption of the LAP and the formation of a working body to monitor their implementation (the body for monitoring the implementation of the LAP).

In 2024, four reports were produced on the adoption of the LAP and the formation of a body to monitor its implementation.

¹⁰ The term local anti-corruption plan in this report includes local anti-corruption plans and the provincial anti-corruption plan adopted by the AP Vojvodina on 1 July 2018.

¹¹ Activity 2.2.10.31 from the Revised Action Plan for Chapter 23

Monitoring the adoption of local anti-corruption plans and establishing a body to monitor the implementation of these documents

During 2024, three LSGs reported to the Agency on the adoption of the LAP. Upon reviewing the submitted documents, it was determined that the municipality of Bačka Topola adopted the LAP in 2019, the City of Čačak in 2022, and the municipality of Čoka in 2024.

From April 2017 to the end of 2024, a total of 117 (80.69%) LSGs¹² adopted LAPs, of which 101 (86.32%) LAPs¹³ were prepared according to the Agency's model, 12 (10.26%) were partially aligned with the model, three (2.56%) did not correspond to the model in either form or content, while one LGU (0.85%) did not provide sufficient data for assessments of the LAP's compliance with the model. The majority, 89% of LAPs, were adopted before 2020, so the deadlines for implementing activities expired several years ago.

The Revised Action Plan for Chapter 23 does not clearly state the instructions regarding the actions of LSGs after the expiry of the LAP implementation period, in terms of revising the existing or developing a new LAP.

Since 2022, only five LSGs have conducted a revision of their LAPs (Kikinda, Babušnica, Beočin, Mionica, Soko Banja).

During 2024, the municipalities of Merošina, Golubac, Veliko Gradište and Babušnica reported to the Agency that they had formed a body for monitoring the implementation of the LAP, of which only the municipalities of Merošina and Veliko Gradište did so in the manner envisaged by the Agency's model.

The fact that in most cases, LSGs formed a body for monitoring the implementation of the LAP in 2022 or 2023, and that they reported this to the Agency only in 2024, indicates that the slowdown trend continues and that the total number of LSGs that have formed this body is small – only 42 (29%) of LSGs¹⁴.

Of the total number of all formed bodies for monitoring the implementation of the LAP, 29 are mostly aligned with the Agency's model, two partially, eight with significant deviations, while for three there is not enough data to give an assessment.

Example of good practice

The Municipality of Mionica revised the existing LAP at the Municipal Assembly session on April 1, 2024. The LAP is valid until 2028 (2024–2028).



12 Compared to 145 LGU (without the territory of Kosovo and Metohija).

13 Compared to number of LGU that adopted the LAP.

14 Compared to 145 LGU (without the territory of Kosovo and Metohija).

EDUCATION

Education of employees on ethics and integrity is key to establishing and developing a sustainable ethical infrastructure in public authorities. Continuous training and investment in professional development in this area enable the improvement of standards of professional conduct, as well as the development of behavioral competencies of employees. This process contributes to strengthening an ethical culture that influences the increase of citizens' trust in the work of institutions. In the long term, education is a powerful tool for changing the behavior of employees and strengthening their individual integrity.

In 2024, the content of the distance training „Ethics and Integrity in the Education System” was created before the start of the second cycle of training implementation

The education system, which includes preschool institutions, primary and secondary schools and universities, encompasses more than two thousand institutions, with over 130,000 employees. Therefore, and primarily due to the importance that employees in educational institutions have in acquiring knowledge and shaping the value system of future generations, the Agency has created a distance learning course „Ethics and Integrity in the Education System”. The training is designed to be fully adapted to the needs of educational institutions and contains all thematic units in accordance with the Training Program in the field of preventing corruption and strengthening integrity. Through numerous illustrated examples from the professional life of teachers and interactive exercises, the training allows participants to acquire specific knowledge and skills that they apply in their professional work. This training, together with the training on ethics and integrity in the healthcare system, will be available to employees in institutions in the second cycle of training implementation.

Corruption has extremely negative consequences for socially vulnerable categories of the population – women, people with disabilities, children, young people, the elderly, Roma men and women, the LGBT community, the uneducated, the unemployed, refugees and internally displaced persons, and the population living in rural areas. These groups are additionally at risk because corruption adds to their already existing status of primary marginalization and exclusion, thereby increasing their vulnerability, isolation, and exposure to exploitation. In this context, the education of employees in public authorities, especially those who work with these groups on a daily basis, is of utmost importance in order for them to be more professional, responsible, and engaged in the protection of socially vulnerable groups and thus contribute to the creation of a society of equal opportunities for all.

The concept of the training on the impact of corruption on socially vulnerable groups is focused on defining basic concepts, illustrating with examples and interactive exercises that cognitively engage participants.

During 2024, 8,563 participants (6,487 women and 2,076 men) were registered for the distance learning course „Society-vulnerable groups and corruption”, and 8,521 of them, or 99.5%, successfully completed this training.

The Agency conducted the 18th training for trainers (training of trainers) in the field of ethics and integrity, which was attended by 10 employees from public enterprises, institutions, the administration of the City of Čačak and the municipality of Gornji Milanovac. The five-day training for trainers was

held with the aim of strengthening the participants' competences for independently implementing the „Ethics and Integrity” training in the bodies where they are employed, which they demonstrated by taking a knowledge test and conducting one segment of the training, thereby gaining the status of educated implementers. After the training, all participants were provided with certificates of successfully completed trainer training.

At the National Academy of Public Administration, the Agency's accredited implementer held a training session on „Ethics and Integrity” attended by six participants, as part of the project „Strengthening the Professional Capacities of Civil Servants in Serbia”, as well as a training session on „Resolving Ethical Dilemmas”, where nine female civil servants in positions had the opportunity to improve their knowledge and decision-making skills in ethically challenging situations.

The State Audit Institution held a training session on „Ethics and Integrity” for new employees who did not attend the training in the first cycle of its implementation. 34 employees attended the training.

An evaluation of the distance training „Ethics and Integrity” in public enterprises and other legal entities was also prepared.

The training implementation cycle includes four phases: training needs analysis, development of a training plan/design model, implementation and evaluation. Evaluation is not a one-dimensional feedback, but represents a significant source of material for changing the basic elements of training. In other words, evaluation enables the improvement and development of training, and leaves room for implementers to intervene, which should contribute to a more efficient achievement of training goals and outcomes.

In the conducted assessment, the largest number of respondents (more than 80%) stated that the distance training „Ethics and Integrity” has interesting content and enough examples that help to master the content more easily, that the definitions of basic terms are clear and understandable, that the video materials/films are realistic and that the training is sufficiently interactive.

Suggestions for improving training relate to increasing the number of examples, making them more complex and presenting them in the form of animation or video material.

In 2024, a report was prepared on the implementation of the „Ethics and Integrity” training in public enterprises and other legal entities.

The collected data on the implementation of the training during 2023, as well as the reports submitted by public enterprises and other legal entities founded or member of which is the Republic of Serbia, an autonomous province, a local government unit or a city municipality, represent the primary data on the basis of which an analysis was conducted and a report was written containing a statistical overview of all modalities of training implementation, information on reporting, identified challenges and recommendations that public enterprises and other legal entities should implement in the next cycle. As it turned out that each category of public authority has its own specificities, the findings from the report with lessons learned will also be useful to the Agency when organizing the next cycle of training implementation.

Example

„Socially sensitive groups and corruption”, i.e. the number of registered participants, we can conclude that attendance of the training is largely related to the implementation of the measures from the integrity plan. The number of registrations increased manifold as the deadline for completing the implementation of the measures from the integrity plan approached. If we look at the categories of bodies in which the participants of the training are employed, we can conclude that attendance is partly conditioned by the existence of professional development procedures, since the largest number of participants are employees of educational and healthcare institutions, which, due to the need to license their employees, have a developed culture of professional development. On the one hand, in this example we can once again see the importance of the interconnection of various anti-corruption mechanisms and their synergistic effect, but also the weakness, which refers to the fact that authorities do not use the potential of the anti-corruption mechanism if they do not have a formal obligation to implement it.

INTERNATIONAL COOPERATION

The Agency participates in all the activities from the negotiations of the Republic of Serbia for membership in the European Union. In the course of the past year, it presented the results of its work by reporting on the implementation of the Revised Action Plan for Chapter 23 (subchapters Judiciary, Fight against Corruption, and Fundamental Rights). With the aim of establishing a system for monitoring the results and cases from its purview, in cooperation with the Republic Public Prosecutor's Office and misdemeanor courts the Agency prepared six-month Reports on the fulfillment of benchmarks for Chapter 23 in the area of conflicts of interest, reporting and verification of the assets and income of public officials, especially judges and prosecutors, and the control of the financing of political activities, in cooperation with the Republic Public Prosecutor's Office and misdemeanor courts.

During 2024, reporting on the results and challenges of the work continued and for the purposes of preparing the European Commission's annual report on Serbia's progress in reforms, in the areas of political criteria, the fight against corruption, the judiciary and public administration reform; on the implementation of the Stabilization and Association Agreement (SAA) through the implementing bodies – the SAA Committee and the Subcommittee on Justice, Freedom and Security and the Special Group on Public Administration Reform.

A contribution was also prepared for the European Commission for the Efficiency of Justice (CEPEJ) for 2023 on the evaluation of the results of judicial reform in the Western Balkans (Dashboard Western Balkans). Today, the CEPEJ represents a single body of all European states, composed of representatives from 47 member states of the Council of Europe, which is responsible for assessing the efficiency of the justice system and proposing practical instruments and measures to improve the efficiency of services provided to citizens.

As part of the Fifth Evaluation Round of the Group of States against Corruption of the Council of Europe (GRECO), which concerns the prevention of corruption and the improvement of integrity in central government bodies – the highest executive functions and in law enforcement agencies, a report on the implementation of the recommendations from the Fifth Evaluation Round for the Republic of Serbia, which are within the competence of the Agency, was prepared and submitted to the Ministry of Justice for further action.

During the past year, representatives of the Agency participated in three plenary sessions of GRECO, as part of the delegation of the Republic of Serbia. At the 97th plenary session of the Group of States against Corruption of the Council of Europe (GRECO) from 17 to 21 June 2024 in Strasbourg, the First Compliance Report of the Republic of Serbia within the framework of the Fifth Evaluation Round was considered and adopted. The meeting presented information on the steps and activities undertaken



by the Republic of Serbia since the adoption of the first evaluation report to date. It is planned that the Republic of Serbia will submit the next report by the end of December 2025.

Documents were also reviewed in preparation for the Sixth GRECO Evaluation Round, which will cover the prevention of corruption and the promotion of integrity at local, regional and decentralized levels, which is scheduled to begin in 2025.

In 2024, the Agency's representatives participated in 24 international conferences and meetings. The most significant participation of the Agency's representatives in international conferences and meetings was in those organized by the UN Office on Drugs and Crime (UNODC), the Secretariat of the Organization for Security and Co-operation in Europe (OSCE), the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR), the Council of Europe, the Regional Anti-Corruption Initiative (RAI), the Organization for Economic Co-operation and Development (OECD), as well as bilateral partners.

In 2024 the Agency also participated in two plenary sessions of the Network of Institutions for the Prevention of Corruption (NCPA), which brings together 32 members, five partner and three observer institutions, and which is chaired by France this year.

After becoming a member of the European Network of Institutions with a Lobbyist Register (ELRN) in 2021, the Agency participated in the annual conference of this initiative last year.

When it comes to reporting on the implementation of the UN Convention against Corruption (UNCAC), comments and amendments were prepared, as well as answers to additional questions on the draft report of the Republic of Serbia on the implementation of the UN Convention against Corruption (UNCAC) for the second cycle of the review of compliance with the Convention.

The participation of representatives of the Agency at the 15th session of the Intergovernmental Working Group on the Prevention of Corruption within the framework of the United Nations Convention against Corruption was also noted. (UNCAC), as well as a joint meeting with the Working Group on the Implementation of the United Nations Convention against Corruption, held in Vienna from 3 to 6 September 2024.

Based on the data collected from the relevant institutions, an OECD contribution was prepared and submitted to the Competitiveness Review of the Western Balkans Competitiveness Report 2024, in which the Agency was designated as the coordinator of the anti-corruption dimension. Representatives of the Agency participated in the final conference at which the Western Balkans Competitiveness Report 2024 for the Republic of Serbia was presented at the Ministry of Finance.

The Agency participated in completing the „Strategies” and „Accountability” questionnaires, as part of the Public Integrity Indicators initiative of the Organization for Economic Cooperation and Development (OECD).

The Agency also participated in the development of the Pilot Report of the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN) Regional Anti-Corruption Review, which consists of two components: Anti-Corruption Policy and Business Integrity.

In addition to improving the existing cooperation with numerous institutions for preventing and combating corruption at the bilateral level, the Agency established communication and cooperation with new anti-corruption institutions in 2024. At a meeting organized by the German International Cooperation Agency (GIZ), representatives of the Agency informed representatives of the South African delegation about the Agency's competencies, especially in the part related to complaints, representations and reporting on corruption.

Representatives of the Agency also participated in numerous meetings with representatives of the OSCE/ODIHR, the Venice Commission and other international organizations regarding the implementation of electoral laws and the control of political campaign financing.

The Director of the Agency participated:

- as the National Coordinator for the Republic of Serbia, at the OECD ACN Plenary Meeting held from 16 to 19 September in Paris, which included the 23rd Istanbul Action Plan Monitoring Meeting and the 29th ACN Network Steering Committee Meeting;
- at the annual meeting of the European Partners against Corruption (EPAC) and the European Anti-Corruption Contact Points Network (EACN) held on 26 and 27 November 2024;

In addition, the Director of the Agency also held meetings with:

- the Ambassador of the Republic of Italy to Serbia, H.E. Luca Gori, at which they discussed future cooperation in the field of corruption prevention, and also highlighted the previous assistance and support of the Government of Italy in strengthening good governance and corruption prevention mechanisms in Serbia;
- the Ambassador of the Republic of Austria to Serbia, H.E. Mr. Christian Ebner, and the Rule of Law Advisor at the Embassy, Mr. Georg Stav, who expressed gratitude to the Embassy of Austria for its continued support to the Agency and for joint efforts in the field of corruption prevention;
- representatives of the Embassy of the Netherlands.



INTERNATIONAL PROJECTS

Through international donor assistance, the Agency's capacities have been strengthened, both in the implementation of entrusted competencies and in the domain of developing employee skills.

The international community has continued to provide continuous support to the Agency through various projects and initiatives, with the aim of systematically strengthening the Agency's professional and technical capacities.

Within the framework of the Project „Support to Strengthening the Rule of Law in the Republic of Serbia (EU Anti-Corruption and Fundamental Rights)”, which is implemented by a consortium consisting of the German International Cooperation Agency (GIZ), the Austrian Development Agency (ADA), the Central Project Management Agency of Lithuania (CPMA) and the OSCE, cooperation activities with the Special Investigation Service of Lithuania have continued. Training courses were implemented for Agency employees on the topics of „Public-Private Partnership”, „Financial Forensics” and „Participants in Anti-Corruption Initiatives”, organized by the International Anti-Corruption Academy, with the support of the EU, the German Federal Ministry and the Austrian Development Agency.

Representatives of the Agency attended the closing event marking the end of the Council of Europe project „Prevention of Money Laundering and Financing of Terrorism in Serbia”, which was implemented with the support of the Swedish International Development Cooperation Agency (SIDA) and in which the Agency was one of the significant participants in the implementation of the activities.

Within the framework of the new Council of Europe project „Combating Economic Crime in Serbia”, which is being implemented with the support of the Swedish International Development Cooperation Agency, within the activity „Regulatory Framework for Lobbying in the Context of Public Decision-Making in Accordance with Council of Europe Standards”, a regional roundtable was held on 13 May 2024, after which the consultant prepared a technical document „Overview of Lobbying Legislation in Serbia”. A roundtable was also held on the assessment of corruption risks in regulations, which was intended to improve and advance the Methodology for assessing the risk of corruption in regulations and at which further steps were agreed.

Representatives of the Agency participated in a workshop on ethics and integrity of top state officials, where the guidelines for ethics and integrity for top state officials in accordance with GRECO recommendations were presented.

The OSCE Mission to Serbia provided significant support to the Agency in organizing an international conference on the occasion of 9 December, International Anti-Corruption Day, supporting workshops with representatives of local self-government, education, health, justice,

social policy and public enterprises aimed at improving the content of the integrity plan model in Kragujevac, Niš, Novi Sad and Belgrade, as well as developing a brochure on key elements of the training curriculum „The Manager as a Driver of Institutional Integrity”.

The Agency participated in the Internship Programme for Youth from South and Southwest Serbia for 2024/2025, which is implemented in cooperation with the OSCE Mission to Serbia and the Ministry for Human and Minority Rights and Social Dialogue and enables young people to gain experience in the work of state administration for 12 months, thus contributing to the development of their communities. The 2024/2025 cycle is being implemented with the support of the Governments of the Kingdom of Norway, the Republic of Turkey, the Federal Republic of Germany and the Republic of Ireland. The programme has been implemented for the fifth year in a row and aims to better understand the work of state institutions, encourage inclusion and greater participation of young women and men from minority and less developed communities in the public administration of Serbia.

Cooperation with the International Foundation for Electoral Systems (IFES) has also continued successfully. Last year, the Agency joined the International Foundation for Electoral Systems Network, which will contribute to the exchange of experiences on common challenges, solutions and good practices in the field of political financing.

When it comes to programming international assistance funds, the Agency continuously participates in the work of sectoral working groups for programming and coordination of the Instrument for Pre-Accession Assistance (IPA) funds and other development assistance for the justice, home affairs and public administration reform sectors, as well as in the preparation of supporting documents.

SUPERVISION OF IMPLEMENTATION OF NATIONAL STRATEGIC DOCUMENTS AND PARTICIPATION IN THE DRAFTING

Supervision of the implementation of strategic documents (in the field of the fight against corruption), in addition to being one of the Agency's key competencies, is an important part of the strategic planning process. Supervision is an instrument for assessing the overall relevance and success of planned anti-corruption objectives, measures and activities and forms the basis for improving future public policies (strategic documents).

As part of the supervision of the implementation of the Revised Action Plan for Chapter 23 – Subchapter „Fight against Corruption”, the Agency prepared the Fourth Implementation Report for 2023, which it submitted to the National Assembly on 22 March 2024.

In the 2023 report, the Agency observed and analyzed the entire reporting period.

In the process of its own strategic planning, the Agency relies on priorities in the field of European integration and in 2024, it developed an Operational Plan for the implementation of the Agency's Strategic Plan for the period from 2023 to 2027 and monitored its implementation on a semi-annual basis, as well as through the Annual Report on the implementation of the Operational Plan. In addition to the Agency's core competencies, the Operational Plan also included a gender equality segment.

The National Anti-Corruption Strategy for the period 2024–2028 (hereinafter referred to as the Strategy) was adopted on 25 July 2024¹⁵, while the Action Plan for the period 2024–2025 year for its implementation (hereinafter referred to as the Action Plan) adopted on 26 December 2024¹⁶. The Agency participated in the meetings of the working group for the development of the Strategy and Action Plan¹⁷, and then in the public debate¹⁸ that preceded the adoption of these documents. Although it was not a member of the working group, the Agency actively participated in the development of strategic documents, proposing activities, deadlines and budget funds for the implementation of which it was designated as the responsible entity. On the other hand, the Agency, through its opinions on the drafts of the Strategy and Action Plan, also presented its suggestions and proposals on other elements of these documents.

15 Official Gazette of the Republic of Serbia, No. 63, July 26, 2024

16 Available at: <https://www.srbija.gov.rs/dokument/45678/strategije-programi-planovi-php>

17 During September 2024, representatives of the Agency participated in two meetings of the working group for the development of the Action Plan in Belgrade and Vršac.

18 The Agency participated in a roundtable discussion as part of the public debate on the Draft Action Plan, which was held on October 21, 2024, in the Palace of Serbia, organized by the proposer, the Ministry of Justice.

Given that the Agency oversees the implementation of strategic documents in the field of combating, or preventing, corruption, including the Strategy and the Action Plan, documents of importance for this process were developed in the reporting period. The Agency adopted the Instructions on the Method of Reporting on the Implementation of Strategic Documents¹⁹ and developed the Guidelines for Reporting on the Implementation and Supervision of the Implementation of the National Anti-Corruption Strategy for the Period 2024–2028 and the Accompanying Action Plan²⁰. The aim of the documents is to establish a reporting process of responsible entities to the Agency, as well as the Agency to the National Assembly. On the other hand, the Agency defined, through the Guidelines, the process of providing opinions and recommendations to responsible entities regarding the implementation of the Strategy and the Action Plan.

In addition to the documents that are important for reporting on the implementation of strategic documents, the Agency has also developed a Methodology for Monitoring the Implementation of the Anti-Corruption Strategy for the Period 2024–2028 and the accompanying Action Plan. The methodology contains information on the method of collecting data on the implementation of measures and activities and the achievement of objectives from the Strategy and Action Plan, an assessment of the status of the implementation of measures and activities and the achievement of objectives, as well as the mandatory elements that the report on the implementation of strategic documents contains. In this way, the Agency has created a systematic framework for collecting and analyzing information that will be necessary for reporting on the implementation of strategic documents, as well as for evaluating their effects.

19 Official Gazette of the Republic of Serbia, No 5, January 17, 2025

20 Available at: <https://sn.rs/kz7u9>

COOPERATION WITH OTHER STATE BODIES

The Agency's connection and cooperation with other state bodies and public institutions is essential in the fight against corruption.

It is necessary in order to collect and exchange information, ensure the verification and analysis of certain data, and also to promptly and efficiently prosecute perpetrators of misdemeanor and criminal offenses in the field of corruption. The exchange of knowledge, experiences and good practices is a pillar of building effective partnerships.

Accordingly, during 2024, the Agency concluded a number of agreements and memorandums of understanding on cooperation with public authorities:

- ● At the beginning of 2024, a Cooperation Agreement was concluded with the Faculty of Law in Novi Sad. The agreement provides for the exchange of information and experience on issues related to science and practice in the field of corruption prevention, participation of Agency employees in conducting guest lectures, participation in joint expert meetings, joint work on scientific and research projects, organization of professional practice of students at the Agency, as well as the implementation of research, study programs, specialist studies and other forms of educational and scientific activities related to the fight against corruption. Also, a significant role in the implementation of the agreement is given to the Agency's regional office in Novi Sad.
- Cooperation Agreement with the Conference of Universities of Serbia (KONUS); is aimed at the targeted participation of Agency employees in the sessions of the KONUS Rectors' Council, working groups and other bodies established by the Rectors' Council, participation in joint expert meetings dedicated to current topics in the field of corruption prevention, joint work on scientific and research projects, as well as publishing scientific and expert papers.
- Agreement on cooperation with the „Association of Business Lawyers” in the field of obligations of public officials and prevention of corruption in the economy.
- Agreement on cooperation in the field of corruption prevention with the Ministry of Education, the Institute for the Improvement of Education and Training and the Institute for the Evaluation of the Quality of Education and Training. The goal of the Agreement is to raise awareness among students in primary and secondary schools and empower them in recognizing and combating corruption.



An analysis of the state of knowledge in the field of corruption prevention will be conducted, on the basis of which joint research projects will be organized.

- The Memorandum of Cooperation between the National Academy of Public Administration and the Agency envisages the establishment of a proactive approach in the field of prevention and fight against corruption in accordance with the strategic documents of the Republic of Serbia, for the purpose of efficient implementation and control of the implementation of positive regulations in this field, according to the highest international standards and in accordance with regulations, especially those regulating professional training in public administration.



- The Agreement on Business and Technical Cooperation signed between the Faculty of Applied Sciences in Niš, the University of Economics Academy in Novi Sad and the Agency represents a significant step towards the realization of jointly planned activities of the signatories. The aim is to familiarize the employees of the Agency with new techniques, tools, methods and comparative practice in the field of business informatics and economics, in relation to certain challenges in preventing and fighting corruption.

Meetings of directors

During 2024, the Director of the Agency had a number of significant meetings and conferences with representatives of the highest state bodies. Among others, the Director of the Agency met with the Minister of Justice Maja Popović, the Minister of State Administration and Local Self-Government Jelena Žarić Kovačević and the President of the Misdemeanor Court in Belgrade Olivera Ristanović.



Meetings of the Director with representatives of local self-government units

During 2024, the Director of the Agency held a number of meetings with mayors and presidents of municipalities of administrative districts. The meetings aimed to provide a closer introduction to the mechanisms for declaring assets and income of public officials, issues of conflict of interest, as well as the new cycle of developing integrity plans, training on ethics and integrity, lobbying,

as well as the obligations of political entities and participants in the election campaign. The meetings were also an opportunity for representatives of local self-government units to point out the opportunities in their environments as well as the issues and dilemmas they encounter in the practical implementation of legal obligations.

The aim and purpose of the meeting was the Agency's effort to constructively implement its preventive role in direct contacts with public officials of local self-governments and thus strengthen the already established mechanisms in the fight against corruption. The meetings achieved a mutual interest, both of the Agency and public officials, to minimize possible violations of the Law on the Prevention of Corruption, the Law on Financing Political Activities and the Law on Lobbying.

„In an open discussion, we resolve possible dilemmas that they encounter every day in their work. On the one hand, we achieve our intention to familiarize them with our competencies, and on the other, to clearly present to them what their obligations towards the Agency are. It is evident that they really want to establish communication with us and make their work as transparent as possible, which is our goal. We expect the effects of these discussions in the coming period when we will analyze the results and compare what the situation was before and what it will be after the meetings held,” said Director Damnjanović at one of the series of meetings.

During the cycle of meetings held during 2024, the Director of the Agency met with representatives of 83 local government units from 20 administrative districts.



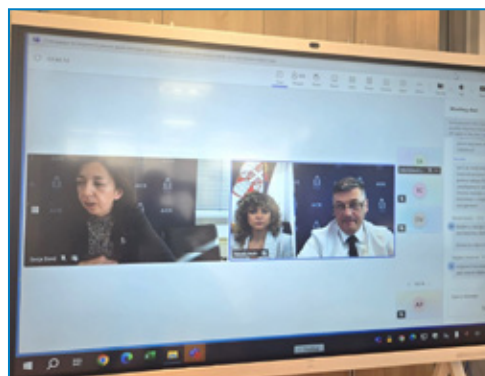
Location of the meeting	Districts	Local government units
Niš	3	8
Novi Sad	2	11
Šabac	1	7
Užice	1	6
Subotica	2	5
Niš	4	20
Zrenjanin	2	6
Kruševac	1	5
Niš	4	15
Total	20	83

Parliamentary Questions

During 2024, the Agency acted on three parliamentary questions in accordance with Article 287 of the Rules of Procedure of the National Assembly. The parliamentary questions related to the Agency's procedures regarding the obligation to declare assets and income of public officials, as well as issues in the field of lobbying.

Training for the Government of the Republic of Serbia

In accordance with the recommendation from the Evaluation Report of the Group of States against Corruption GRECO, the first online training in the cycle „Standards of Integrity of Public Officials through a Legal and Institutional Framework for Preventing Corruption” was held for the highest executive positions. The training was held in cooperation with the General Secretariat of the Government.



Amounts of fines collected and fees from training for lobbyists

According to statistics of misdemeanor courts in the Republic of Serbia, in misdemeanor proceedings initiated at the request of the Agency for the Prevention of Corruption, misdemeanor courts imposed fines in the total amount of 18,957,000.00 dinars in 2024, of which a total of 7,020,990.00 dinars were collected during the same year.

During 2024, 219,790 dinars were charged for attending training and issuing a certificate of completion of training for a lobbyist in the Budget of the Republic of Serbia.

COOPERATION WITH CIVIL SOCIETY ORGANIZATIONS

Civil society organizations (CSOs) represent a kind of intermediary between citizens and public authorities. The role of civil society in the context of preventing corruption includes education and research on corruption, oversight of the work of authorities and their representatives, raising public awareness of the harmful effects of corruption, advocating for the introduction of new anti-corruption policies, etc.

In 2024, four projects of anti-corruption education for youth were financially supported in the amount of 5,864,400 dinars.

The Agency conducted the 16th public competition for the award of financial CSO with the aim of raising the level of education of young people in the function of preventing corruption, i.e. educating, empowering and motivating primary and secondary school students, male and female students for active participation in preventing corruption through the implementation of educational programs and other project activities. 15 CSOs submitted project proposals to the public competition, and eight of them met the formal requirements, of which the Competition Committee awarded the highest number of points: to the Užice Center for Human Rights and Democracy for the project „Fighting Corruption with a Focus on Youth”, the Podrinje Anti-Corruption Team (PAKT) for the project „Less Corruption – Richer Society”, the Bečej Youth Association for the „Program for Acquiring and Improving Competencies of Socially Responsible Youth – Clean Up Corruption” and the „Magenta” Association for the project „Preventing Corruption through Empowering and Networking Youth at the Regional Level”.

Within the framework of the above projects, workshops, forums and panel discussions are being implemented with pupils and students in the areas of Užice, Loznica, Požega, Prijepolje, Priboj, Bečej, Kladovo, Bor, Majdanpek and Negotin, and it is expected that the project activities will be expanded to 12 more cities in central and southern Serbia by engaging peer educators. The above activities should encourage the involvement of young people in preventing corruption through a better understanding of this phenomenon, increased resilience and recognition of the negative impact of corruption on the social community and public resources as a whole. The popularization of this topic and the great interest expressed by young people at the workshops held so far pave the way for its introduction into regular school curricula.

During 2024, three consultative meetings were held with CSOs that were awarded financial resources for the implementation of youth anti-corruption education projects. The aim of the meetings was to familiarize CSO representatives in detail with their obligations towards the Agency, types, methods and deadlines for reporting, supporting documentation attached to narrative and financial reports, obligations related to the public and promotion of project activities, project audits, development of training plan models and evaluation methods. This type of meeting proved to be extremely useful,

especially for those organizations that established cooperation with the Agency for the first time, as they made project administration more efficient and productive.

The Agency also conducted two monitoring visits to monitor the implementation of projects it financed in 2023 and 2024, in accordance with the Rules on the Implementation of the Public Competition for the Allocation of CSO Funds for the Implementation of Projects in the Field of Corruption Prevention. The first visit monitored the implementation of the project „Corruption Risk Analysis in the Regulations of Local Self-Government Units”, which was implemented by the association „Transparency Serbia”. The second visit was held with representatives of the Podrinje Anti-Corruption Team – PAKT, which is implementing the project „Less Corruption – Richer Society”. The monitoring findings of both visits with recommendations were submitted to the associations so that they could implement project activities more efficiently.

The Agency continuously monitored the implementation of the project „Analysis of Corruption Risks in Local Government Regulations” implemented by the association „Transparency Serbia”. The project envisaged an analysis of corruption risks in 60 regulations. All analyses were submitted to the assemblies of 28 cities, as well as to the mayors of city administrations, along with recommendations for eliminating the identified risks and proposals for improving the acts. Upon completion of this project, and based on the submitted narrative, financial and auditor reports, a final report on the implemented financial support for the project was prepared and posted on the Agency's website to be available to the public.

In the public competition for the allocation of funds, 15 CSOs submitted project proposals, but almost half (seven) were rejected because they did not meet the formal requirements prescribed in the Application instructions. The Application instructions also contain a summary of all necessary documents that are attached to the project proposal and budget as a reminder for CSOs during the preparation of the application documentation. Despite this, in each competition, a certain number of proposals are rejected for formal reasons. Unfortunately, sometimes these are projects of extremely high quality in terms of content and it is a pity that they are not further considered and implemented due to formal reasons.

RAISING PUBLIC AWARENESS

CONFERENCES, MEDIA APPEARANCES, PRESS RELEASES, ETC.



Marking the International Anti-Corruption Day

Traditionally marking the International Anti-Corruption Day, the Agency held a ceremonial academy on December 9, 2024, at the Military Hall in Belgrade, and on December 10, at the Hotel „Metropol”, with the support of the OSCE Mission to Serbia, it organized an International Conference entitled „The Power of the Institutional Framework in the Fight against Corruption”.

The numerous guests and dignitaries at the academy were addressed by the Director of the Agency, Dejan Damnjanović, and the artistic program was performed by the Ensemble of the Ministry of Defense of the Republic of Serbia “Stanislav Binicki”, with guest soloists.

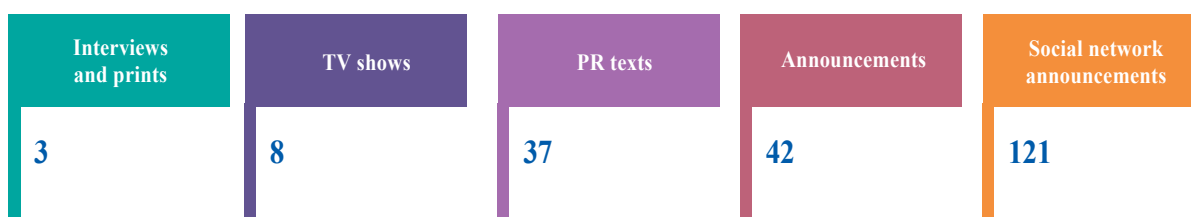
The celebration of this significant date continued with the holding of an expert conference „The Power of the Institutional Framework in the Fight against Corruption”. The key speakers at the conference were: H.E. Jan Bratu, Head of the OSCE Mission to Serbia, Plamena Halacheva, Deputy Head of the EU Delegation to Serbia, Ivica Dacic, Deputy Prime Minister and Minister of Internal

Affairs of Serbia, Bojana Šćepanović, State Secretary at the Ministry of Justice, Saša Stevanović, State Secretary at the Ministry of Finance and Dejan Damnjanović, Director of the Agency.

The panelists of the thematic discussions „Judicial Framework in the Fight against Corruption” and “Financial Controls to Prevent Corruption” were the most eminent representatives of public authorities with whom the Agency cooperates in the field of judicial anti-corruption procedures and mechanisms, as well as in financial control processes to prevent corruption. A special focus on thematic solutions from comparative practice was provided at the conference by representatives of the Italian Financial Police and an expert from the United Nations Office on Drugs and Crime.



Media activities



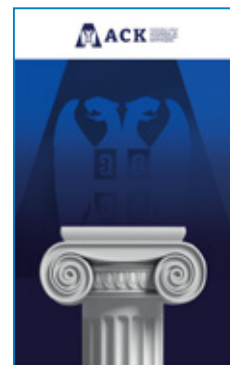
Media training

In 2024, an online media training session was held „Effective models of communication between the Agency and the Media”. The training was attended by ten representatives of media outlets, who were presented with an interactive presentation of the Agency’s actions in the area of controlling reports of political entities, reporting and verifying the assets of public officials and conflicts of interest.



Publications

During 2024, the Agency published the third edition of the „GUIDE FOR PUBLIC OFFICIALS”, which were submitted to the National Assembly and the General Secretariat of the Government in order to familiarize MPs and the highest executive public officials with the obligations under the Anti-Corruption Law.



Announcements

85 announcements about the Agency's work were posted on the Agency's official website, of which three were thematic announcements by the Agency regarding the handling of a report by „Transparency Serbia", references to the provisions of the Law on Financing Political Activities regarding the operation of call centers on election day, and an announcement by the Agency regarding the research „Social Integrity System – Serbia 2023” conducted by „Transparency Serbia”.

Agency fact sheet newsletter

The Agency fact sheet newsletter was regularly and timely updated during 2024. The majority of the content updated during the year related to personnel changes in the Agency, as well as updating documents in the field of finance.

REPORT ON THE WORK

OF THE COUNCIL

During 2024, the Council held 11 regular and one telephone session. Within the competence of the Council to decide on appeals against decisions made by the Director of the Agency, during 2024, the Council decided on 50 appeals at regular sessions, of which 45 appeals were rejected as unfounded, in three cases the first-instance decisions were annulled, in one case the Council amended the first-instance decision, and one case was returned to the first-instance body for completion of the procedure.

When it comes to annulled first-instance decisions, in two cases these were procedures in which the Board²¹ had already decided on appeals in 2018 and 2019 when it rejected the appeals as unfounded, and against these Board decisions public officials initiated administrative disputes in which the Administrative Court, in its judgments issued in 2024, upheld the claims of public officials, annulled the Board's decisions and returned the procedures for re-determination on appeal. In the retrial, the Panel annulled the first-instance decision from 2018 in one case and suspended the proceedings because the statute of limitations had expired in the meantime, i.e., the prescribed five-year period had elapsed since the public official acted contrary to the law, and in the second proceeding, the first-instance decision from 2019 was annulled and the proceedings suspended due to the application of the Authentic Interpretation of the provision of Article 2, paragraph 1, item 3 of the Law on the Prevention of Corruption, which was adopted by the National Assembly of the RS on February 11, 2021. In one case, the Panel annulled the first-instance decision rejecting the public official's objection, because it found that there was no omission on the part of the public official in relation to the submission of the appeal, given that the supplement to the proceedings established that the postal operator had tampered with his shipment.

During 2024, the Council, acting at the request of the Administrative Court, submitted a response to six lawsuits filed to annul the Council's decisions, and 42 administrative disputes are ongoing based on lawsuits from previous years. The Administrative Court delivered 14 judgments during 2024. 12 lawsuits were dismissed, and two lawsuits were upheld and the cases were returned for retrial.

21 Until the date of application of the Law on the Prevention of Corruption on September 1, 2020, appeals filed against decisions of the Director of the Anti-Corruption Agency were decided by the Board as the second-instance body of the Agency

Regarding the request of the Director of the Agency to take a position of principle on whether the provision of Article 68, paragraph 2 of the Law should be interpreted as referring only to re-election to the same public office or whether it refers to the situation of termination of public office and immediate re-election, appointment or appointment to another public office when public officials have not had other changes in the report on assets and income, the Panel took the following position of principle:

„A public official who, after termination of public office, is re-elected, appointed or appointed to the same or any other public office, and there is no change in relation to the previously submitted report on assets and income, within the meaning of Article 68, paragraph 2 of the Law, is obliged to notify the Agency thereof. The notification should contain the data prescribed by the Law necessary for the proper processing of that notification”.

Appeals Council decisions – total	Number
Appeals Rejected	45 (32 m / 13 f)
Annulment of First Instance Decision	3 (m)
Amendment of First Instance Decision	1 (m)
Supplement to Procedure	1 (m)
Total	50 (37 m / 13 f)

Appeals Council decisions – property control	Number
Appeals Rejected	6 (3 m / 3 f)
Annulment of First Instance Decision	1 (m)
Supplement to Procedure	1 (m)
Total	8 (5 m / 3 f)

Appeals Council decisions – conflict of interest	Number
Appeals Rejected	39 (29 m / 10 f)
Annulment of First Instance Decision	2 (m)
Amendment of First Instance Decision	1 (m)
Total	42 (32 m / 10 f)

Administrative Court Proceedings on complaints against Bord/Council Decisions

Decisions of the Administrative Court submitted in 2024	Number
Rejected appeals	12 (9 m / 3 f)
Accepted appeals	2 (m)
Total	14 (11 m / 3 f)

CORRUPTION RESEARCH

Researching corruption is a complex process that aims not only to understand and analyze the factors that enable its emergence and spread, but also to develop strategies for prevention and suppression, thereby contributing to building healthier and more just societies.

Although researching corruption can be challenging due to the complexity and sensitivity of the topic, it provides invaluable insight into how societies function, what their weaknesses are, and how effective systems for preventing and suppressing corruption can be built.

In 2024, an analysis of statistical data from all areas of the Agency's work was carried out in accordance with the criteria from the Methodology for Assessing the Effects of the Law on the Prevention of Corruption.

Data on the results of activities within all thematic areas from the prescribed scope of work of the Agency are organized in the format of a single electronic spreadsheet, which is functionally adapted for data entry and automatic processing. According to the defined parameters, data for 2021, 2022 and 2023 from all relevant sectors of the Agency were collected and entered into the spreadsheet. The Report on the Effects of the Implementation of the Law on the Prevention of Corruption for the needs of the Agency was prepared with the support of the United Nations Office on Drugs and Crime and the Regional Anti-Corruption Initiative, as part of the implementation of the Roadmap of the Regional Platform for the Western Balkans to Fight Corruption. The preparation of the Report was foreseen by the Revised Action Plan for Chapter 23 and is the result of the application of the Methodology for the Assessment of the Effects of the Implementation of the Law.

Public opinion research agencies conducted surveys on the views of public sector employees, private sector representatives and citizens on the effects of the implementation of the Law, in the period from February to April 2024. In accordance with the criteria from the Methodology, the data collected during the preparation of the Report served to create indicators for measuring the effects of the implementation of the Law, i.e. for analyzing the effects of the activities and results of the Agency's work. In addition, for the purposes of preparing the Report, the Agency's statistical data necessary for quantifying its activities and results of work for each individual thematic area were also used.

The research results indicate, among other things, that corruption is a widespread problem in Serbia. Given its legally prescribed competences, the Agency has the opportunity to influence positive changes through its actions in the form of reducing the risk of corruption, and to determine which thematic areas and which specific activities contribute to the greatest extent to the desired effects of its work, i.e. the implementation of the Law.

In 2024, a survey was conducted on the representation of topics related to the prevention of corruption in the programs of academic institutions. The survey is a segment of the implementation of one of the activities from the Agency's Strategic Plan for the period 2023–2027, to increase the level of involvement of the general public in preventing the occurrence of corruption, both through

cooperation in specific anti-corruption initiatives, and through continuous strengthening of public awareness of the importance of preventing corruption and joint efforts in this area. Within the framework of this strategic goal, it was specifically emphasized that the Agency will devote itself in particular to involving young people in education, strengthening awareness and encouraging their initiatives in preventing corruption and building integrity.

In this regard, activities on additional education of students through various programs aimed at acquiring knowledge and practical skills regarding the application of anti-corruption mechanisms, which may be useful to students in their future professional work, represent an important step on the path of combating corruption.

The research covered higher education institutions in the educational-scientific, or educational-artistic fields: medical, social-humanistic, technical-technological and natural-mathematical sciences and arts. In this way, 75 state higher education institutions from Belgrade, Kragujevac, Novi Sad and Niš were covered. The primary objective of the research was to determine whether the study programs of the mentioned state universities, which were organized and implemented in the previous 10 years, included topics that addressed issues of prevention and fight against corruption.

The questionnaire was completed by 44 higher education institutions, which represents a response rate of 58.7%. The results of the research showed that the dominant percentage of faculties from the mentioned universities has not implemented any type of education (program, course, specialist studies, etc.) in the field of corruption prevention in the last 10 years. Namely, as many as 81.8% of academic institutions declared this way, while only four (9.1%) of the surveyed faculties answered this question in the affirmative. When invalid questionnaires (9.1%) are excluded from the entire sample, given that they submitted answers to a question that was not asked in the questionnaire, two categories of respondents remain, a total of 40, whose answers were related to the research topic, and the structure of these answers thus defined is shown in the graph.

Considering that, according to the research results, a negligible number of academic institutions have topics in their study programs that separately address issues of prevention and fight against corruption, it is necessary to enable the building of institutional capacities and the improvement of anti-corruption mechanisms at faculties.

STRENGTHENING THE CAPACITY OF THE AGENCY

Agency's human resources

As of December 31, 2024, the Agency's Professional Service employed a total of 94 people, of which 93 were permanent, out of a total of 162 provided for by the Regulation on Internal Organization and Systematization of Jobs, which represents 57.40% of the job positions and one person on a fixed-term contract. Of the above number, 69 women (65%) and 37 men (35%) were employed by the Agency. In terms of age structure, the Agency has three employees aged 21–30 (two women and one man), 20 employees aged 31–40 (10 women and 10 men), 40 employees aged 41–50 (29 women and 11 men), 37 employees aged 51–60 (24 women and 13 men) and six employees aged 61–70 (four women and two men).

Strategic and operational human resources planning and forecasting of future requirements in the area of employee knowledge and skills, which arise from the Agency's competence, were practically implemented through the implementation of training for all employees in accordance with the Professional Development and Additional Education Program for 2024, through 41 training courses organized by the National Academy of Public Administration and 18 training courses organized by domestic and international partners. The total number of employees in the Agency who have undergone training is 247, while the total number of employees who have undergone training related to the implementation of laws under which the Agency operates in the reporting period is 64, which means that 2/3 of employees attended training related to the Law on Prevention of Corruption, the Law on Lobbying and the Law on Control of Financing of Political Activities, with the note that the same employees participated in certain trainings, depending on the topic and the organizational unit of the Agency to which the topic relates.

Just some of the workshops, round tables, conferences, etc. in which the employees of the Agency participated were:

- Regional conference in Tirana, organized by the Council of Europe, on the topic „Corruption and Money Laundering in Relation to Environmental Crime”;
- Training „Public-Private Partnership", held in Belgrade, organized by the International Anti-Corruption Academy (IACA);
- Online conference „European Network of Countries with a Register of Lobbyists” (ERLN) held in Lithuania;
- Round table „Analysis of the Regulatory Framework for Lobbying in Serbia and Suggestions for Improvement” organized by the Council of Europe, held in Belgrade;
- Training „Introduction Program for Mentors and Participants in the Professional Practice Program”, organized by the OSCE, held on Kopaonik;
- Workshop „Harmonization of Positions on the Implementation of the Law on Public Procurement”, organized by USAID, held in Belgrade;
- Workshop on Ethics and Integrity of Senior State Officials, organized by the Council of Europe;

- Meeting and introduction of interns from other state bodies to the Agency's competencies, under the OSCE Internship Programme;
- Study visit to Novi Pazar within the OSCE Internship Programme;
- Meeting with international experts in Belgrade, regarding the improvement of the Methodology for assessing the risk of corruption in regulations, organised by the Council of Europe;
- Training on „Financial Forensics”, held in Belgrade, organised by the International Anti-Corruption Academy (IACA);
- Training on „Participants in Anti-Corruption Initiatives”, held in Belgrade, organised by the International Anti-Corruption Academy (IACA);
- Training on clusters of negotiation chapters, held in Belgrade, organised by the Regional School for Public Administration (RESPA).

Regional units in Novi Sad, Kragujevac, Niš

During 2024, in accordance with the Law on prevention of corruption and the Work Program of director Damnjanović, the Agency opened three regional units outside its headquarters.

The first official opening was the opening of the Kragujevac regional unit on March 14, 2024. The premises of the Kragujevac regional unit are located in the City of Kragujevac Administration building, and the opening was also attended by representatives of the local government. After the official opening, members of the Agency Council, the Kragujevac City Council and the Agency Director with their associates visited the Kragujevac October Memorial Park, laid a wreath at the monument and paid tribute to the Kragujevac victims of World War II – a *friendship tree* was planted in the Memorial Park – a symbol of life and strong ties between people.

During 2024, a significant visit to the RU Kragujevac was also the visit of the Ambassador of the European Union Mission to Serbia, H. E. Emanuele Gioffre, the Ambassador of Italy, H. E. Luca Gori, and the Ambassador of Slovakia, H. E. Michal Pavuk, as part of their official visit to Kragujevac.

The second regional unit of the Agency was opened in Niš on 27 March 2024. The premises of this Agency unit are located at Generala Milojka Lešjanina Street, no. 26. The premises were opened by the Director of the Agency, and the opening was also attended by representatives of the local government. As part of the official opening, the Agency delegation visited one of the most significant monuments of Serbian history, „The Skull tower”, and a *friendship tree* was planted in the park on King Alexander Square.

In the center of Novi Sad, at Trg Slobode 3, in the presence of the highest city officials and guests, on April 10, 2024, the premises of the Novi Sad regional unit of the Agency were opened. Traditionally, as in Kragujevac and Niš, a *friendship tree* was planted in the host city, and then the director and members of the Agency Council laid a wreath at the Memorial Cross and paid tribute to the warriors of 1912–1918.

Until the official opening, the regional units primarily worked on securing space and staffing capacities, and after the opening of the premises, the focus was on establishing the work process of the business units and establishing direct communication with representatives of public authorities from the territory of the regional units, primarily representatives of the city authorities of Niš, Kragujevac and Novi Sad.



The Agency's regional units enabled public authorities, public officials, political entities, as well as citizens and representatives of civil society, to have direct and faster communication with the Agency.

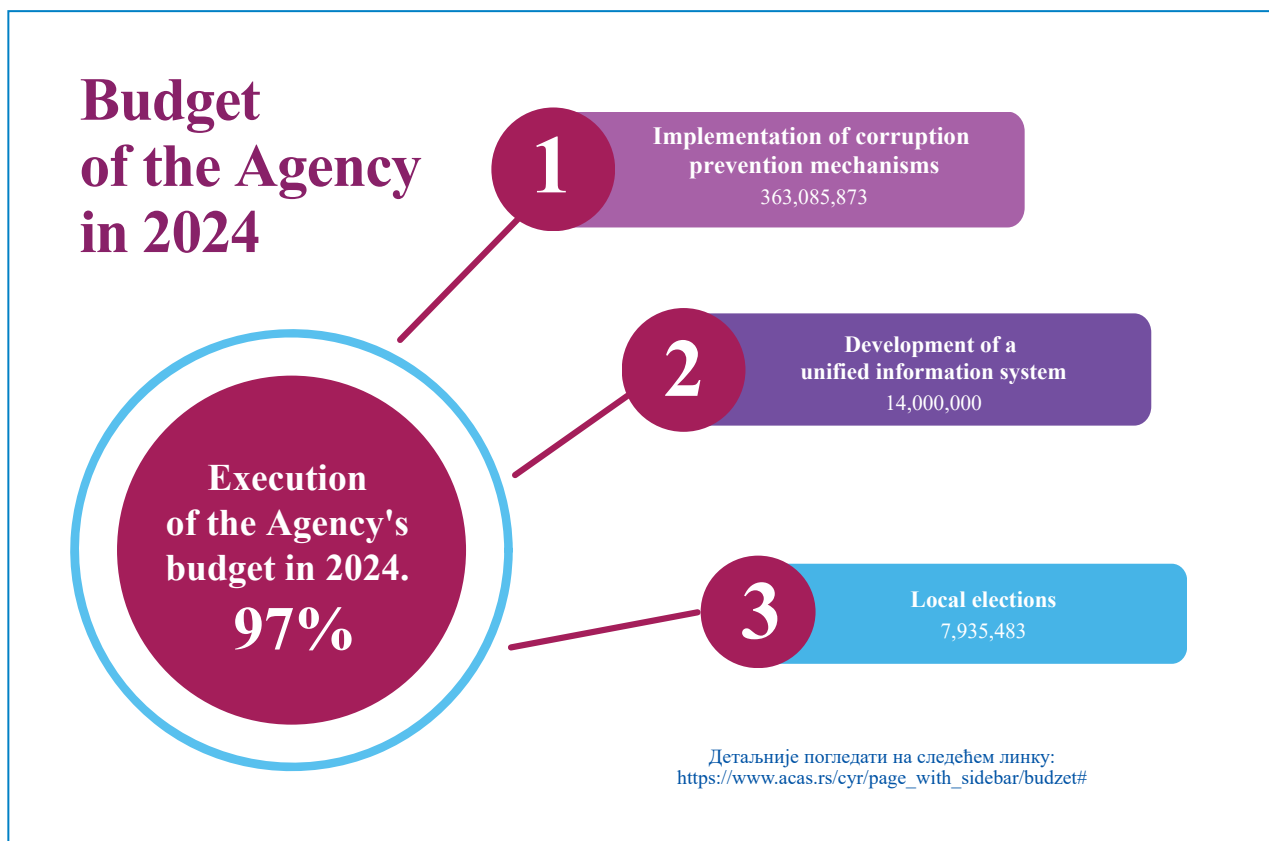
During 2024, trainings were organized in the regional units of Novi Sad, Niš and Kragujevac for representatives of political entities, both in relation to the implementation of the Law on Financing of Political Activities, and with public officials and responsible persons in public authorities in relation to the implementation of the Law on the Prevention of Corruption and the Law on Lobbying.

A total of 13 trainings were held in the regional units during 2024 („Manager as a driver of institutional integrity building”, „Implementation of the Law on Financing of Political Activities” and trainings entitled „Prevention of conflicts of interest, registers, records and verification of assets of public officials”).

Also, contracts were signed with field observers of election campaigns for the local elections held in June 2024 in the premises of the regional units; Contact databases of local self-government units and public authorities from the territories of regional units have been formed, all with the aim of direct contact and information on obligations under the laws within the competence of the Agency.

During 2024, regional units achieved significant cooperation with representatives of local self-government, the judiciary, as well as institutions of the education system, specifically with the Faculty of Law in Novi Sad, the Faculty of Law in Kragujevac and the Faculty of Economics in Niš.

Material and technical capacities of the Agency



The total amount of funds for the Agency's work for 2024 amounted to 396,553,000 dinars.

Planned funds for salaries, benefits and social benefits for employees amounted to 277,386,000 dinars, which represents 69.95% of the total amount.

The total budget execution in 2024 amounted to 385,021,320 Dinars, which is 97% of the total approved funds. Unspent funds were returned to the budget of the Republic of Serbia.

Program activity: 0007 – Implementation of corruption prevention mechanisms

Economic classification	Budget item	Planned	Executed	Residual	% of execution
411	Salaries, allowances and employee benefits	233,613,000	231,576,524	2,036,476	99.13
412	Social contributions borne by the employer	35,508,000	34,764,377	743,623	97.91
413	Benefits in kind	1,000,000	890,802	109,198	89.08
414	Social benefits to employees	2,465,000	1,515,720	949,280	61.49
415	Employee expenses compensation (transportation to work)	3,300,000	3,212,296	87,704	97.34
416	Employee benefits and other special expenses	1,500,000	1,416,315	83,685	94.42
421	Fixed costs	8,345,000	7,138,015	1,206,985	85.54
422	Travel expenses	1,885,000	1,230,700	654,300	65.29
423	Contractual services	57,565,000	54,817,769	2,747,231	95.23
424	Specialized services	500,000	381,385	118,615	76.68
425	Current repairs and maintenance	6,600,000	4,632,923	1,967,077	70.20
426	Materials	3,200,000	2,782,572	417,428	86.96
481	Grants to non-governmental organizations	5,865,000	5,864,400	600	99.99
482	Taxes, mandatory fees and penalties	150,000	38,017	111,983	25.34
483	Fine and court-ordered penalties	100,000	0.00	100,000.00	0.00
485	Compensation for injuries or damage caused by state authorities	200,000	81,825	118,175	40.91
511	Buildings and construction facilities	3,360,000	3,357,393	2,607	99.92
512	Machinery and equipment	8,141,000	8,078,334	62,666	99.23
515	Intangible assets	1,320,000	1,306,469	13,531	98.97
Total:		374,617,000	363,085,873	11,531,127	96.92

Project 1: 7066 – Parliamentary and local elections

Economic classification	Budget item	Planned	Executed	Residual	% of execution
423	Contractual services	7,936,000	7,935,483	517.00	99.99
Total:		7,936,000	7,935,483	517.00	99.99

Project 1: 5001 – Development of unified information system

Economic classification	Budget item	Planned	Executed	Residual	% of execution
423	Contractual services	14,000,000	14,000,000	0.00	100
Total:		14,000,000	14,000,000	0.00	100

All public procurement procedures in 2024 were carried out in a timely manner and the necessary procurement contracts were concluded. The contracts were executed or are being executed in accordance with the agreed dynamics²².

During 2024, working conditions and safety at work of employees were improved, namely:

- Work was carried out on the fire alarm system in the Agency building;
- Electrical installations were checked;
- Roof repair work was carried out;
- The external facade on the terrace of the building was decorated;
- The cornices on the terrace of the building were completely cleaned and repainted;
- Part of the outdated equipment was replaced;
- Part of the furniture was replaced;
- A video surveillance system was introduced in the Agency building in Belgrade and the buildings where the regional units in Niš and Novi Sad are located.

Information capacities of the Agency

Since its establishment, the Agency has recognized the importance of digitalization in its operations. Processing a large amount of data is not possible without a high-quality, modern and secure information system that can quickly adapt to new requirements and challenges in terms of improving business efficiency and information security. The major work of renewing and modernizing the information system was finally completed in 2024.

In terms of improving the information infrastructure, the purchase of two Data Storage devices, Huawei OceanStor Dorado 3000 V6, with a total value of 12,085,173.61 dinars, was finally realized through a donation from the Delegation of the European Union to Serbia within the framework of the project "EU for support to the rule of law", for the implementation of which it is responsible, among others, for the United Nations Office for Project Services (UNOPS). The aforementioned IT

²² More details on the Agency's website https://www.acas.rs/cyr/javne_nabavke

equipment is intended for storage, preservation and archiving of data and aims to improve security, establish better system stability and availability of the Agency's data and services. This completes the project to renew the Agency's hardware infrastructure.

Considering the importance and degree of importance of the registers in our databases, the Agency is constantly working to raise the level of protection, improve security, as well as the availability of our services to public officials and the public. With the help and support of the Office for Information Technology and Electronic Governance, a secondary location was established in the State DATA Center, in Kragujevac. This means that the Agency's complete information system was replicated and a remote location was created for storing backup copies of data, in the best and most secure environment of its kind in this part of Europe.

Based on the above, we can freely say that the Agency's information system is fully capable of responding to all requirements in carrying out the Agency's core business, information security, as well as quickly adapting and responding to new requirements and challenges.

GENDER PERSPECTIVE OF PREVENTING CORRUPTION

Integrating a gender perspective into the work of public authorities has become a standard of good planning and good administration.

The Agency fulfills the provisions of the Law on Gender Equality that relate to gender statistics and provides an overview of the most important data classified by gender.



Control of the financing of political activities and campaigns sector	Total	Women	Men
Number of submitted annual reports on financing of political entities in the reporting period	181	35	146
Number of verified (formal control of correctness) annual reports on financing of political entities in the reporting period	174	31	143
Number of content controls of annual reports on financing of political entities in the reporting period	25	10	15
Number of content controls of final reports on election campaign expenses in the reporting period	97	45	52
Number of submitted requests for initiation of misdemeanor proceedings against a political entity and a responsible person in a political entity due to violation of the LFPA, in connection with the submission of an annual financing report, in the reporting period, as follows	61	10	51
For failure to submit an annual financing report	55	9	46
For failure to use 5% of funds from public sources for professional training and work with membership	2	0	2
Other violations	4	1	3
Number of requests submitted to initiate misdemeanor proceedings against a political entity and a responsible person in a political entity due to violations of the LFPA, in connection with the submission of reports on election campaign expenses, in the reporting period, as follows:	219	36	183
For failure to submit preliminary reports on election campaign expenses	130	23	107
For failure to submit final reports on election campaign expenses	85	11	74
For submission of incomplete final reports on election campaign expenses	4	2	2

Number of decisions received / notifications on the outcomes of actions taken by competent authorities on criminal charges against persons for a criminal offense under the Law on Financing of Political Activities, in the reporting period	2	0	2
Criminal charges dismissed	2	0	2
Number of distance learning participants in the reporting period	12	4	8
Number of training participants for political entities in the reporting period	79	31	48
Legal Affairs and Lobbying Sector	Total	Women	Men
Number of requests submitted for initiating misdemeanor proceedings, in the reporting period, against public officials for violations of the Law on Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARATIONS OF ASSET AND INCOME	131	46	85
Number of requests submitted for initiating misdemeanor proceedings, in the reporting period, against judges for violations of the Law on Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARING ASSET AND INCOME	4	4	0
Number of requests filed for the initiation of misdemeanor proceedings, in the reporting period, against prosecutors for violations of the Law on the Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARING ASSET AND INCOME	16	7	9
Number of requests filed for the initiation of misdemeanor proceedings, in the reporting period, against holders of the highest executive functions for violations of the Law on the Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARING ASSET AND INCOME	1	0	1
Number of misdemeanor court decisions, submitted in the reporting period, issued on the basis of requests for the initiation of misdemeanor proceedings against public officials for violations of the Law on the Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARING ASSET AND INCOME, as follows:	189	70	119
Agreement on the recognition of a misdemeanor	5	2	3
Convictions (warning measures and fines – total)	171	64	107
Warning measures	79	29	50
Fines	92	35	57
Acquittals	4	0	4
Suspensions / termination of proceedings	9	4	5
Number of misdemeanor court decisions, submitted in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against judges for violations of the Law on the Prevention of Corruption relating to Chapter VI GIFTS and Chapter VII DECLARATION OF ASSET AND INCOME, as follows:	4	3	1

Convictions (warning measures and fines – total)	4	3	1
Warning measures	3	2	1
Fines	1	1	0
Number of misdemeanor court decisions, submitted in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against prosecutors for violations of the Law on Prevention of Corruption related to Chapter VI GIFTS and Chapter VII DECLARATIONS OF ASSET AND INCOME, as follows:	2	1	1
Convictions (warning measures and fines – total)	1	0	1
Warning measures	1	0	1
Acquittals	1	1	0
Number of requests submitted for initiating misdemeanor proceedings, in the reporting period, against public officials for violations of the Law on Prevention of Corruption related to conflict of interest	12	8	4
Number of misdemeanor court decisions, submitted in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against public officials for violations of the Law on Prevention of Corruption related to conflict of interest in the reporting period and as follows:	7	0	7
Convictions (warning measures and fines – total)	7	0	7
Warning measures	2	0	2
Fines	5	0	5
Number of misdemeanor court decisions submitted in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against a responsible person in a public authority for violations of the Law on Prevention of Corruption related to the integrity plan, as follows:	2	1	1
Convictions (warning measures and fines – total)	2	1	1
Fines	2	1	1
Number of requests submitted to initiate misdemeanor proceedings, in the reporting period, against a responsible person in a public authority for violations of the Law on Prevention of Corruption related to training in the field of preventing corruption and strengthening integrity	5	0	5
Number of requests submitted to initiate misdemeanor proceedings, in the reporting period, against a responsible person in a public authority for violations of the Law on Prevention of Corruption related to training in the field of preventing corruption and strengthening integrity	6	1	5
Convictions (warning measures and fines – total)	4	1	3
Warning measures	1	1	0
Fines	3	0	3

Acquittals	1	0	1
Suspensions / termination of proceedings	1	0	1
Number of misdemeanor court decisions, delivered in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against public officials for failure to respond to the Agency's summons, as follows:	1	0	1
Convictions (warning measures and fines – total)	1	0	1
Warning measures	1	0	1
Number of criminal charges filed against public officials for failure to declare assets and income in order to conceal them in the reporting period	1	0	1
Number of decisions/notifications received on the outcomes of actions taken by competent authorities on criminal charges against public officials in the reporting period	2	1	1
Dismissed criminal charges applying the principle of opportunity	1	0	1
Dismissed criminal charges	1	1	0
Number of criminal charges filed as a result of actions taken by a representative in the reporting period	2	1	1
Number of training participants in the reporting period	280	137	143
Number of training participants who organized by the Agency	280	137	143
Number of training participants in the reporting period	286	140	146
Number of training participants for candidates for obtaining certificates	6	3	3
Number of training participants for lobbyists	280	137	143
Number of training participants who obtained a certificate of completion of training in the reporting period	5	2	3
Number of training participants in the reporting period	247	167	80
Number of training participants organized by the Agency	6	4	2
Number of training participants organized by international organizations	59	31	28
Number of training participants organized by the NAJU	151	110	41
Number of training participants organized by other authorities and organizations	31	22	9
Control of conflicts of interest and accumulation of offices sector	Total	Women	Men
The number of requests received for the performance of another function, notice about the performance of another job or activity (referring to membership in associations in this section and in all other sections that follow), and the establishment of an employment relationship or business cooperation after the termination of public office (pantouflage) in the reporting period	997	413	584
Number of requests to perform another function	429	160	269
Number of requests / information to perform another function	560	249	311

Number of requests to establish an employment relationship or business cooperation after termination of office (pantouflage)	8	4	4
The total number of resolved requests of public officials for the performance of another function, the performance of another job or activity, and the establishment of an employment relationship or business cooperation after the termination of the public function in the reporting period	719	370	349
For another function	231	119	112
For performing another job or activity	480	248	232
Pantouflage	8	3	5
The number of decisions made in the reporting period, rejecting the request of a public official or notifying the official that the simultaneous performance of a public function and work endangers the impartial performance of a public function and obliges the official to stop performing that work.	80	29	51
For another function	34	11	23
For performing another job or activity	45	18	27
Pantouflage	1	0	1
The number of decisions made in the reporting period by which the request was rejected, a decision was made to suspend the procedure, or a notification was delivered that the Agency is not competent to make a decision on the request (resolved in another way)	102	42	60
For another function	87	35	52
For performing another job or activity	15	7	8
The number of resolutions passed, in the reporting period, approving the public official's request	382	112	270
For another function	183	67	116
For performing another job or activity	198	45	153
Pantouflage	1	0	1
The number of decisions on the requests of public officials to perform another function, perform another job, or engage in another engage in another activity to establish an employment relationship or business cooperation after the termination of the public function that became final and enforceable in the reporting period	42	14	28
The number of officials who acted according to the Agency's decisions , rejecting the request for consent, and stopped performing another incompatible function, performing another job, or activity	40	17	23
The number of notices received about suspected conflicts among interest of public officials in the reporting period	40	19	21
The number of given opinions (notifications) about suspected conflicts of interest of public officials in the reporting period	40	19	21

The number of notices given in the reporting period by which the Agency established that the suspicion of a conflict of interest of a public official was justified and by which it was recommended that the public official refrain from acting or making decisions in a specific situation, i.e., another proposal was given to eliminate the conflict	18	7	11
Registers, records and verification sector	Total	Women	Men
The number of lobbyists registered in the Register of Lobbyists	2	0	2
The number of deleted from the Register of Lobbyists	3	1	2
The number of proceedings initiated against public officials, in the reporting period, due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME NAMELY:	211	74	137
Due to the delay in submitting the report upon entering public office and due to the incorrect and incomplete report submitted upon entering public office	81	26	55
Due to the delay in submitting the report (notification of unchanged status) in assets and income upon resuming public office	32	14	18
Due to the delay in submitting the report after the termination of the public office and due to the incorrect and incomplete report submitted after the termination of the public office	66	21	45
Due to non-reporting of significant changes in assets and income during the exercise of public office	19	9	10
Due to multiple violations of the law related to the obligations of the same public official to declare assets and income	13	4	9
The number of proceedings completed in the first instance, in the reporting period, against public officials for violation of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	198	69	129
Due to the delay in submitting the report upon entering public office and due to the incorrect and incomplete report submitted upon entering public office	85	29	56
Due to the delay in submitting the report (notice of unchanged status) in assets and income upon resuming public office	31	11	20
Due to the delay in submitting the report after the termination of the public office and the incomplete report submitted after the termination of the public office	63	22	41
Due to non-reporting of significant changes in assets and income during the exercise of public office	13	6	7
Due to several violations of the law related to the obligation of the same public official to declare assets and income	6	1	5
Number of measures imposed for public disclosure of decisions on violations of the law in the reporting period due to violations of the Law on Prevention of Corruption relating to Chapter VII DECLARATIONS OF ASSET AND INCOME	1	0	1

The number of reported appeals against the decisions of the Agency's first-instance body related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	5	2	3
The number of proposals for submitting a request to initiate misdemeanor proceedings for violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME, in the reporting period	169	67	102
The number of received decisions on the outcomes of misdemeanor court actions on requests to initiate misdemeanor proceedings against public officials, in the reporting period (for requests submitted until November 2023)	8	6	2
Convictions (reprimands and fines in total)	8	6	2
Reprimands	3	3	0
Fines	5	3	2
Number of proposals for filing criminal charges against public officials for failure to declare assets and income in order to conceal them in the reporting period	3	0	3
Integrity sector	Total	Women	Men
Number of training participants in the reporting period	40	27	13
Number of training participants organized by the Agency	34	23	11
Number of training participants organized by NAJU or other entities	6	4	2
Number of participants who completed distance learning on ethics and integrity in the reporting period	3	2	1
Number of ToT participants in the reporting period	10	7	3
Number participants who completed distance learning on the impact of corruption on particularly vulnerable groups in the reporting period	8521	6439	2082
Number of participants in training on integrity plans in the reporting period	190	127	63
Number of participants in training on integrity plans organized by the Agency	74	52	22
Number of participants in training on integrity plans organized by NAJU or other entities	116	75	41
Number of participants in training for managers in the reporting period	102	53	49
Number of participants in training for managers organized by the Agency	83	43	40
Number of participants in training for managers organized by NAJU or other entities	19	10	9

CONTACT

The Agency for Prevention of Corruption

Address of headquarters and office: Carice Milice 1, 11000 Belgrade

E-mail: office@acas.rs

Regional unit of Novi Sad

Address: Trg slobode 3, 21 000 Novi Sad

E-mail: office.ns@acas.rs

Regional unit of Kragujevac

Address: Trg slobode 3, 34 000 Kragujevac

E-mail: office.kg@acas.rs

Regional unit of Niš

Address: Generala Milojka Lešjanina 26, 18 000 Niš

E-mail: office.ni@acas.rs



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