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FOR PREVENTION
OF CORRUPTION



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INTRODUCTORY REMARKS

The 15th anniversary of the establishment of the Agency for the Prevention of Corruption was marked in 2025 by presenting to the public not only the results achieved, but also the fact that today the Agency is recognized as an established state body of undeniable importance for the effective fight against corruption. In complex social and institutional circumstances, the Agency continued to consistently implement its mission – strengthening the integrity of public office, the accountability of public officials and citizens' trust in institutions.

During the reporting period, the Agency acted in accordance with its legal powers and the principles of independence, professional responsibility and public work, improving preventive mechanisms in the areas of preventing conflicts of interest, control of assets and income, oversight of financing of political activities, integrity plans and lobbying, as well as through the intensification of educational activities intended for different target groups. I am convinced that preventive mechanisms represent the strongest response to corruption risks.

In 2025, the Agency made further progress in strengthening its institutional capacity and improving internal procedures and digital tools, which contributed to greater efficiency in work and availability of information to the public. At the same time, we continued cooperation with other state bodies, independent institutions, civil society and the media, while recognizing partnership as a key prerequisite for sustainable prevention of corruption.

A special effort in the previous year was dedicated to strengthening of international and regional cooperation. With the international conference, organized on December 9 on the occasion of the International Anti-Corruption Day and the anniversary of the Agency, we sent a strong message as an active and reliable partner in the construction of modern anti-corruption mechanisms. An important moment on that occasion was the presentation of the *Manual for developing anti-corruption awareness among primary and secondary school students*, the creation of which I consider one of

the most important strategic steps in the implementation of the Agreement on Cooperation with the Ministry of Education and the two competent Institutes. I see the implementation and application model of the Manual in teaching as one of our priorities in 2026.

In 2026, I expect further qualitative progress, first of all through the adoption of new laws in the field of preventing corruption, then financing political activities as well as lobbying, so that through their consistent implementation, we can improve the existing mechanisms of responsibility, transparency and oversight with the aim of further strengthening integrity and institutional responsibility. By adopting the amendments to the Law on Prevention of Corruption and the Law on Lobbying, a significant part of GRECO's recommendations within the Fifth Round of Evaluation related to the prevention of corruption and strengthening of integrity in central public authorities (top executive functions) and law enforcement bodies will be fulfilled.

My belief is that normative solutions have real meaning only if they are consistently applied in practice and if they contribute to greater accountability and trust of citizens in institutions. For this reason, the Agency will continue to act decisively, professionally and in the public interest, with a clear awareness of the responsibility it bears.



PRESIDENT OF THE COUNCIL
Biljana Pavlović

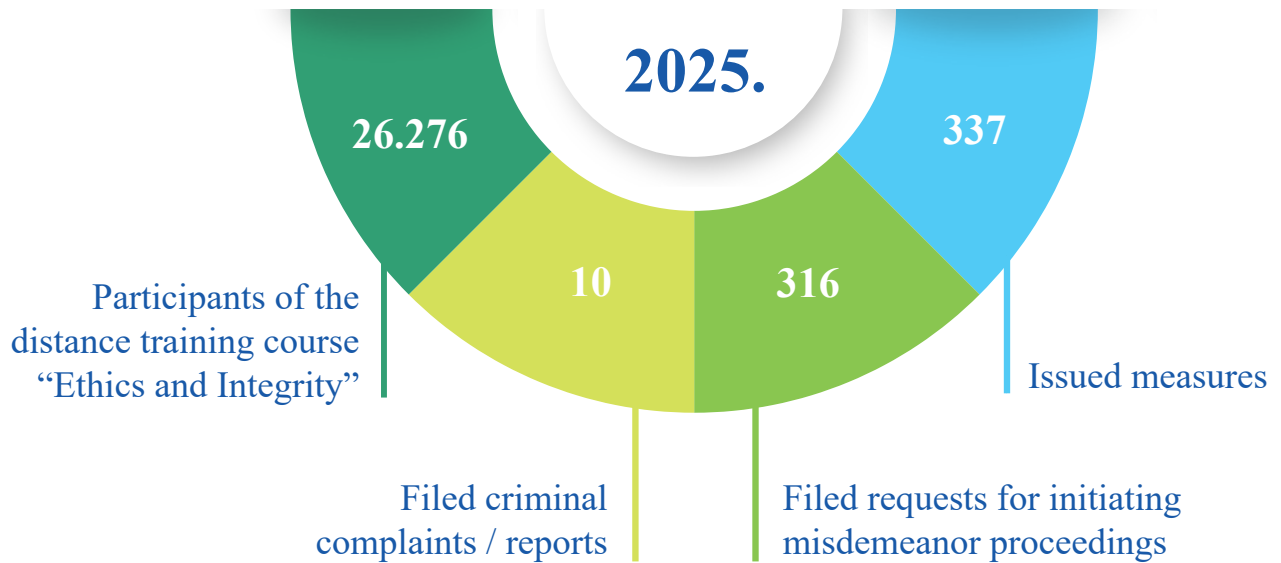


DIRECTOR
Dejan Damnjanović

KEY RESULTS IN 2025

The Agency for the Prevention of Corruption (hereinafter: the Agency) as an independent state body with numerous preventive, control and oversight responsibilities performed the following activities during 2025:

- Due to the violation of the Law on Prevention of Corruption in connection with the resolution of conflicts of interest, issued 70 measures of reprimand, six measures of public disclosure of decision on the violation of the Law and one measure of recommendation for dismissal from public office. Agency also issued two decisions on termination of public office ex lege;
- Resolved 731 requests of public officials for giving consent for performing another public office, that is, for performing another job or activity, for membership in association bodies, for establishing an employment relationship or business cooperation after the termination of the public function – pantouflage (revolving door restrictions);
- In the area of reporting and verification of reports on assets and income, filed ten criminal complaints / reports with the competent public prosecutor's offices, in proceedings initiated during 2025, including proceedings initiated in the previous year, imposed a total of 218 measures, of which 211 were measures of reprimand and seven measures of public disclosure on violation of the Law on Prevention of Corruption;
- Published the Catalog of gifts for 2024, which includes 710 protocol and special gifts, which public officials from 49 bodies of all levels of government, during 2024, received in connection with the exercise of public office;
- Due to violation of the provisions of the Law on Financing of Political Activities, submitted a total of 34 measures of reprimand, 27 decisions on the loss of funds from public sources and 148 requests for the initiation of misdemeanor proceedings;
- Supervised the implementation of integrity plans in the third cycle and prepared a report with recommendations;
- Created distance training "Development and implementation of an integrity plan";
- Created a comprehensive training program in the field of preventing corruption and strengthening integrity for various target groups and on the distance learning platform enabled the attendance of new online trainings in the areas of: Conflict of interest, Registries and asset verification, Integrity plan, Risk assessment of corruption in Legislation and Lobbying in Serbia – obligations of lobbied persons;
- Submitted seven opinions on the assessment of the risk of corruption in legislation to the proposers of the law and submitted one initiative to amend the current law;



- In order to fulfill the recommendations of the Group of States against Corruption of the Council of Europe (GRECO), as part of the Fifth Round of Evaluation, which provides for mandatory training on integrity standards for the persons on the top executive functions upon taking office, two specialized trainings for newly elected ministers in the Government of the Republic of Serbia, entitled "Integrity Standards of Public Officials through the Legal and Institutional Framework for the Prevention of Corruption", were held in cooperation with the General Secretariat of the Government and the Cabinet of the Prime Minister;
- Fulfilling the obligations assumed by the signed Cooperation Agreement of the Agency with the Ministry of Education of the Government of the Republic of Serbia, the Institute for the Improvement of Education and the Institute for Education Quality and Evaluation, the Agency prepared a Manual for raising anti-corruption awareness in educational institutions;
- This year marked the 15th anniversary of the Agency's establishment and the International Anti-Corruption Day. To commemorate the occasion, an international conference entitled '15 Years of Development of Anti-Corruption Mechanisms Based on International Institutional Cooperation' was organized.

AGENCY RECOMMENDATIONS

- It is necessary to adopt all proposed amendments to the Law on Prevention of Corruption and the Law on Lobbying in order to fulfill the recommendations of the Group of States against Corruption of the Council of Europe (GRECO) from the Fifth Round of Evaluation, which refer to the prevention of corruption and the improvement of integrity in the highest bodies of executive power.
- It is necessary to adopt the Law on Amendments to the Law on the Financing of Political Activities, in order to fulfill the recommendations of the Office for Democratic Institutions and Human Rights (ODIHR) in order to regulate the actions of third parties (legal and natural persons who are not contributors in the sense of the Law), with the aim of influencing the election result or the activity of a political entity, as well as to regulate the issue of preventing the financing of political activities in relation to the cooperation of political entities with legal and natural persons who are connected to the officials of political parties, i.e. responsible persons and founders of groups of citizens.
- Introducing anti-corruption topics into the scientific curricula of higher education institutions with the aim of raising the awareness of young people.



ABOUT AGENCY

The Agency is an autonomous and independent state body which, for the performance of tasks within its competence, is accountable to the National Assembly. 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 total amount of funds for the work of the Agency for 2025 was 429,932,000 RSD.

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 the Republic of Serbia", No. 35/2019, 88/2019, 11/2021 – Authentic interpretation, 94/2021 and 14/2022);
- Law on Financing of Political Activities ("Official Gazette of the Republic of Serbia", No. 14/2022);
- Law on Lobbying ("Official Gazette of the Republic of Serbia", no. 86/2018 and 86/2019);
- Law on Referendum and People's Initiative ("Official Gazette of the Republic of Serbia", 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 be applied accordingly.

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

1. supervises the implementation of strategic documents, submits to the National Assembly a report on their implementation with recommendations for action, gives the responsible subjects recommendations on how to eliminate shortcomings in the implementation of strategic documents and initiates changes and additions to strategic documents;
2. adopts general acts;
3. initiates and conducts proceedings for deciding on the existence of violations of this law and imposes measures in accordance with this law;
4. decides on the conflict of interest;

5. performs activities in accordance with the law governing the financing of political activities, that is, the law governing lobbying;
6. submits criminal complaints, requests for initiation of misdemeanor proceedings and initiatives for initiation of disciplinary proceedings;
7. maintains and publishes the Register of Public Officials and the Register of Property and Income of Public Officials in accordance with this law;
8. verifies reports on assets and income submitted by public officials;
9. maintains and verifies the data from the records determined by this law;
10. acts upon complaints submitted by natural and legal persons;
11. gives opinions on the application of this law on its own initiative or at the request of natural or legal persons and takes positions of importance for the application of this law;
12. initiates the adoption or amendment of Legislation, issues opinions on the assessment of the risk of corruption in draft laws from areas of particular risk for the emergence of corruption and opinions on draft laws that regulate issues covered by confirmed international agreements in the field of prevention and fight against corruption;
13. investigates the state of corruption, analyzes the risks of corruption and prepares reports with recommendations to eliminate the risks;
14. supervises the adoption and implementation of integrity plans;
15. adopts a training program and instructions for training in the field of corruption prevention and monitors the implementation of training in public authorities;
16. performs tasks of international cooperation in the field of corruption prevention;
17. performs other duties specified by law;
18. applies the law regulating the general administrative procedure.

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

1. controls the financing of political entities;
2. submits requests for the initiation of misdemeanor proceedings and imposes reprimands for violating the provisions of the law;
3. adopts decisions on the loss of rights to funds from public sources;
4. keeps records of financial reports of political entities;
5. organizes and coordinates the observation of election campaigns.

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

1. publishes the name of the organizer of the referendum campaign;
2. publishes reports on the expenses of the referendum campaign;
3. controls the reports on the expenses of the referendum campaign;
4. submits requests for initiation of misdemeanor proceedings for violation of this law.

Competences of the Agency established by the Law on Lobbying:

1. training and certification of completed training for lobbyists;
2. keeping the Register of Lobbyists;
3. keeping the 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 authorities on lobbying contacts of officials elected, appointed, employed or otherwise engaged in that body;
6. imposing measures in case of breach of obligations to a lobbied person, i.e. a responsible person in a public authority, in accordance with the law governing the prevention of corruption, i.e. initiation of disciplinary proceedings;
7. checking reports on the work of lobbyists, that is, legal entities performing lobbying;
8. submitting a request for the initiation of misdemeanor proceedings for misdemeanors prescribed by 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, decides on the requests of public officials in accordance with the Law on Prevention of Corruption, 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 responsible for judicial affairs, and conducted by the Judicial Academy.

THE COUNCIL

The Council of the Agency 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 that law, supervises the work of the Director and monitors his property status. Council members are elected by the National Assembly after a public competition, which is announced by the Ministry of Justice and conducted by the Judicial Academy. The constitutive session of the Council, at which the Rules of Procedure were adopted, was held on March 24, 2021. The work of the Council is managed by the President, who is elected by the members from among themselves, for one year, with the fact that the same person can be elected a maximum of two times. At the proposal of the President of the Council, a deputy president is elected from among the members for a period of one year.

In order to ensure two-level decision-making, the Council, in accordance with the Law, decided on appeals against the decisions of the Director, made decisions on legal issues, as well as other decisions within its jurisdiction.

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

Members of the Council:

- Biljana Pavlović, head of the Office of the President of the Commission for the Protection of Competition and head of protocol in the Commission for the Protection of Competition (as President of the Council from September 13, 2025),
- Vesna Lazarević, retired judge of the Administrative Court in Belgrade (in the position of Deputy President of the Council from 13 September 2025),
- Stevo Bajić, employed in the Agency as a member of the Council (as President of the Council until September 13, 2025),
- Danica Marinković, retired judge of the Court of Appeal in Kragujevac (in the position of Deputy President of the Council until September 13, 2025) and
- Tamara Mišić, employed at the Agency as a member of the Council.

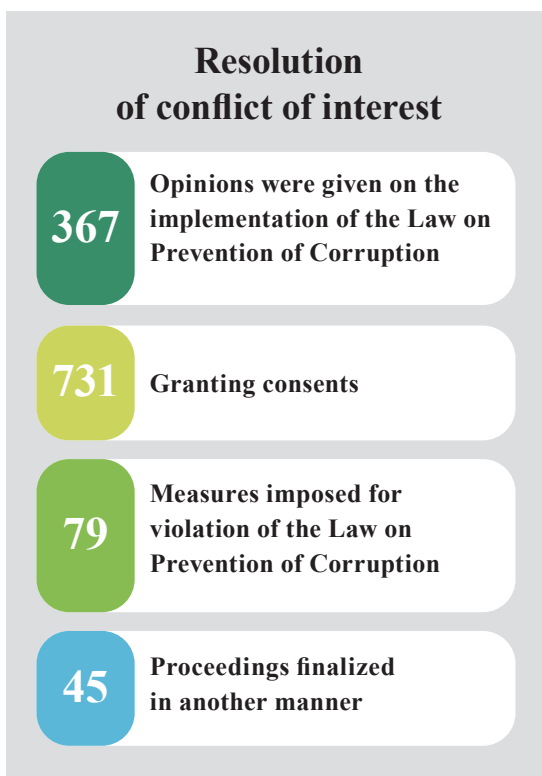


ACTIVITIES IN 2025

CONFLICT OF INTEREST, CUMULATION OF PUBLIC OFFICES AND TRANSFER OF MANAGEMENT RIGHTS

Prevention and resolution of conflict of interest situations in the performance of public offices is one of the competences of the Agency. The primary goal of these activities, as well as the unauthorized accumulation of offices, is to preserve integrity and reduce the risk of abuses and the creation of circumstances in which, even if there appears to be a conflict of interest, it is recorded in order to take appropriate preventive measures, and if it is established that it is necessary, appropriate measures are imposed. By recording disputed situations and taking preventive or punitive measures, a system is established in which public work and institutional control directly affect the strengthening of the personal and professional integrity of public officials, as well as institutional responsibility.

In the reporting period, a total of 1,276 procedures related to the resolution of conflicts of interest were completed or resolved as follows:



- 367 opinions were given on the implementation of the Law on Prevention of Corruption from the thematic area;
- 731 requests of public officials for granting consent for the performance of other public office were resolved, i.e. for performing another job or activity, for membership in association bodies, for establishing an employment relationship or business cooperation after the termination of public office – pantoflage (revolving door restrictions) as follows:
 - in 610 cases, the Agency gave consent for the performance of another public office, i.e. for the performance of another job or activity,
 - 48 decisions were made that rejected the public official's request for consent to perform another public office, i.e. to perform another job or activity (of which two are determinative),
 - in 28 cases, the Agency informed the public official about the conflict of interest situation.

- 45 procedures were finalised in another way (by adopting a decision rejecting the request as untimely or irregular, that is, a decision on suspension of the procedure, with official notification that the Agency is not competent).

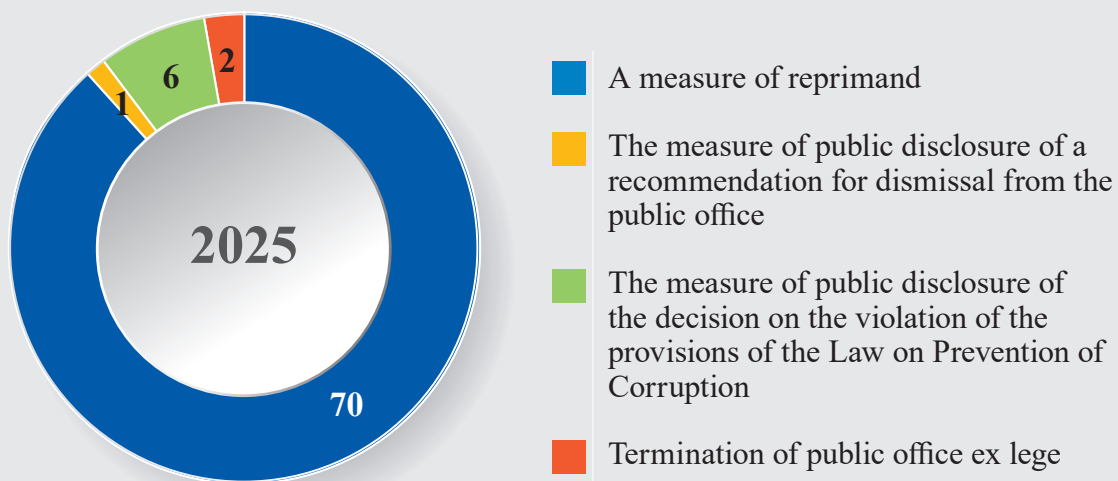
In addition to the above, in two procedures public officials informed the Agency that they had transferred management rights in the company, and thus acted in accordance with the provisions of the article 51 of the Law on Prevention of Corruption.

Due to the violation of the Law on Prevention of Corruption, the Agency imposed 79 measures, namely:

- 70 decisions with a measure of reprimand,
- one decision by which measure of public disclosure of a recommendation for dismissal from the public office was issued,
- six decisions that determined a violation of the law and measure of public disclosure of the decision on the violation of the Law on Prevention of Corruption was issued,
- two decisions which found a violation of the provisions of Article 56 of the Law on Prevention of Corruption and established the termination of public office ex lege, in one of which a measure of reprimand was also issued.

In 97 procedures initiated ex officio and on the basis of a report, no violation of the law was established and they were resolved in another way (by a decision to suspend the procedure, by informing the parties that there are no grounds for conducting the procedure to decide on the existence of a violation of the provisions of the Law on Prevention of Corruption, by notifying the parties that the Agency is not competent to act, by an official note and in another way).

Structure of imposed measures for violations of the provision of the Law on Prevention of Corruption



PROCEDURE IN CONNECTION WITH THE ELECTION CAMPAIGN

During the election campaign for the local elections held in 2025, in the municipalities of Zaječar, Kosjerić, Mionica, Negotin and Sečanj, the Agency received a total of 12 reports against public officials due to suspected violations of Article 50 of the Law on Prevention of Corruption.

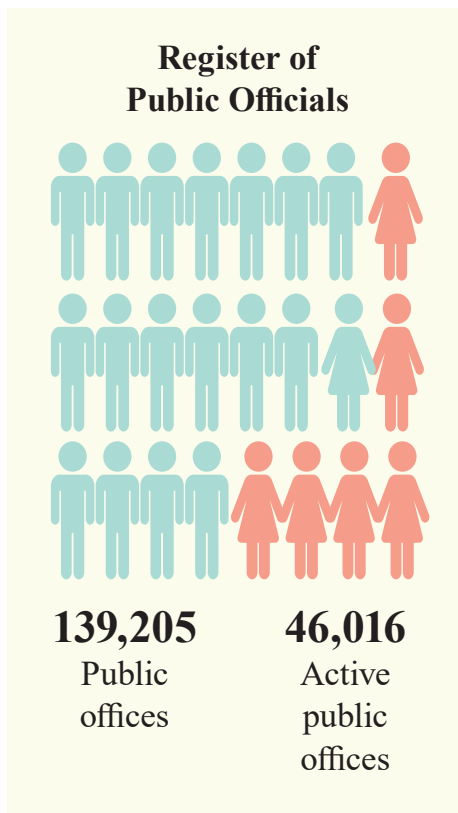
During the election campaign, due to the established violation of the provisions of Article 50 of the Law on Prevention of Corruption (paragraphs 2, 4 and 5), measures were imposed on public officials in situations where they used a public resource for the purpose of public representation of participants in the elections, used meetings they had in their capacity as a public official and public resources for the promotion of a political party, and when they did not unequivocally present to the interlocutors and the public whether they were presenting the position of the authority in which they perform public office or the position of the political party. These are:

- in three cases, a violation of the law was established and measures of reprimand were issued to public officials,
- in nine cases, in accordance with the provisions of Article 81, paragraph 3 of the Law on Prevention of Corruption, the Agency informed the applicants that there is no basis for proceeding with a decision on the existence of a violation of the law.

EXAMPLES FROM PRACTICE

- In a proceeding initiated based on a complaint against a public official, formerly the chairman of the supervisory board of a public company, it was established that he acted contrary to the provisions of Articles 40 and 42, paragraph 1 of the Law on Prevention of Corruption, because during the performance of the public office of the chairman of the supervisory board of a public enterprise, the spouse of the public official, as an entrepreneur, had business cooperation with that public enterprise, and that he did not inform the Agency in writing about the conflict of interest that the public official had in the aforementioned situation.
- In a proceeding initiated based on a complaint against a public official, formerly a member of the City Council, it was established that he acted contrary to the provisions of Article 40, paragraph 1 of the Law on Prevention of Corruption in connection with Article 33. Paragraph 2 item 3 of the Law on Sports, in that, during the period, he simultaneously performed the duties of a representative of a football club, as well as in that he acted contrary to the provisions of Art. 40. Paragraphs 1 and 2, Art. 42 paragraph 1 and Art. 49 of the Law on Prevention of Corruption, in that during the performance of the said public office, funds were transferred from the city budget to the football club of which he was a representative, and he did not inform the Agency in writing about the conflict of interest he had in the said situations.

REGISTERS AND SPECIAL RECORDS



The Agency maintains, verifies and publishes data from registers and records prescribed by the Law on Prevention of Corruption and the Law on Lobbying. The registers and records are as follows:

- Register of Public Officials,
- Register of assets and income of public officials,
- Records of legal entities in which a public official or a family member has a share or shares, which participate in public procurement, privatization or other procedures, and 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 self-government unit or a city municipality has a share or shares,
- 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 aforementioned records are essential instruments of prevention and control within the fight against corruption, as well as the implementation of the Agency's competences. 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 the legal obligations of public officials, and provide a basis for establishing and determining their responsibility, in accordance with the legal framework defined by the Law on Prevention of Corruption. The establishment of such records not only provides accurate and timely information about which subjects 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. Effective, accurate and precise keeping of registers is the basis for the implementation of numerous competences of the Agency, including the identification and sanctioning of violations of legal norms. This 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.

Establishing accurate, precise and complete registers and records and regularly updating the data in them is a basic assumption in the process of controlling the legality of the exercise of public offices.

A total of 2,302 public authorities notified the Agency that a public official has entered public office, that is, that his public office has ceased. The number of processed and verified notifications on the election, appointment, nomination or termination of public office in 2025 is 18,623.

In the Register of Public Officials, as of December 31, 2025, 139,205 public offices are registered, of which 46,016 are active public offices.

In addition to the registers, the Agency also maintains the Registry of legal entities in which a public official or a family member has shares. During 2025, eight legal entities submitted 273 notifications to the Agency about participation in public procurement, privatization or other procedures.

REPORTS ON ASSETS AND INCOME OF PUBLIC OFFICIALS (REGISTRATION AND VERIFICATION)

One of the obligations of public official is to submit a Report on assets and income (hereinafter: Report), which, in addition to data related to the public official himself, also includes data on the assets and income of his spouse or common-law partner, as well as minor children, if they live in the same family household. In this way, the public is provided with an insight into the reported property status of public officials, which, on the one hand, reduces doubts about their conscientiousness and responsibility when performing public offices, and on the other – contributes to maintaining their integrity.



Raw reports

Since the establishment of the Agency through December 31, 2025, there are 5,132 unprocessed reports in the assets and income Register. They consist of the following reports:

- *public officials who do not have the obligation to submit a report by law,*
- *public officials who, according to the Authentic Interpretation of the Law on Prevention of Corruption, are no longer public officials,*
- *public officials whose public office ended more than 7 years ago,*
- *persons who are not subject to the obligation to submit a Report.*

The first reports that were submitted to the Agency were manually filled in and typed, which slowed down the processing itself. Also, this number was influenced by the way the report was submitted, as well as the application software, which was improved compared to 2010. The system has now been upgraded and the reports are completed and submitted electronically, which has reduced the time of their processing.

VERIFICATION OF REPORTS ON ASSETS AND INCOME OF PUBLIC OFFICIALS

The Agency monitors and checks the timeliness, accuracy and completeness of the data contained in the Reports. While the regular check is carried out based on the Annual Plan, which is adopted by the Director based on the previous analysis of the Agency, extraordinary procedures for checking the Report are initiated when there is an indication of data concealment. If the Agency suspects that accurate and complete data are not submitted in the reports, it performs extraordinary checks of the accuracy and completeness of the data. Those procedures can be initiated by the Agency's findings, media announcements or reports submitted in accordance with the Law on Prevention of Corruption.

During 2025, the Agency checked the accuracy, completeness and timeliness of the submission of Reports for a total of 400 public officials.

Checks were carried out in accordance with the Annual Check Plan for 2025 for 305 public officials, and previously started checks were followed.

Due to the suspicion that accurate and complete data were not given in the Reports, 12 extraordinary checks of the reports of public officials were initiated.

The annual inspection plan for 2025 includes judges of the Supreme Court, public prosecutors of the Supreme Public Prosecutor's Office and members of parliament in the National Assembly of the Republic of Serbia.

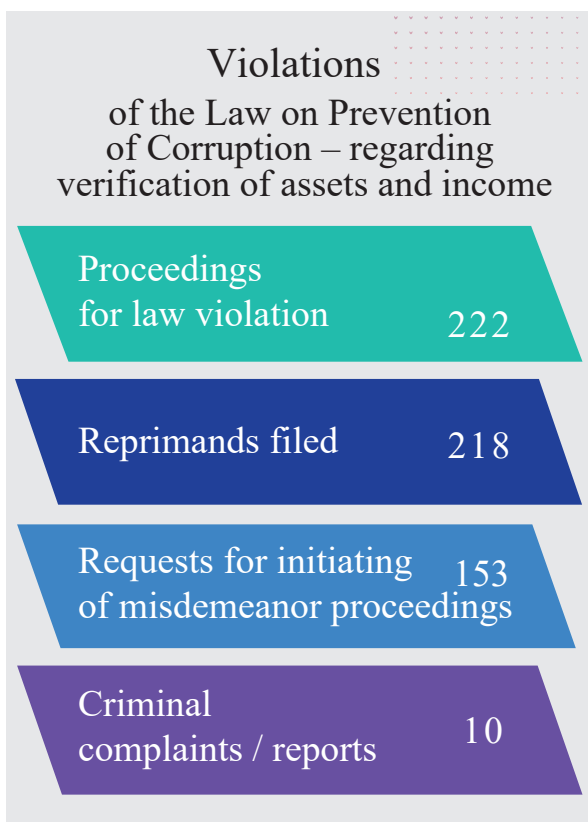
The verification of the Reports of 146 public officials has been completed.

Due to the violation of the Law on Prevention of Corruption, i.e. delay in submitting the Report, reporting incorrect and/or incomplete data, as well as failure to report important changes during the exercise of, and after the termination of public office, the Agency initiated a total of 222 proceedings against public officials at the republican, provincial and local levels of government.

In the procedures initiated during 2025, including the procedures initiated in the previous year, the Agency issued a total of 218 measures, of which 211 were measures of reprimand and 7 were public disclosures of decisions on violations of the Law on Prevention of Corruption.

Measures of reprimand were imposed due to:

- untimely submission of the Report and due to the submission of an incorrect or incomplete Report after election, appointment or nomination to public office – 55 measures;
- untimely submission of the Report and due to the submission of an incorrect or incomplete report upon termination of public office – 59 measures;
- untimely submission of the Report on significant changes in assets and income for the duration and after the termination of the public office – 31 measures;
- cumulative violations of provisions committed by the same public official – 21 measures;
- untimely submission of the Report / notification on the absence of changes in assets and income after re-election, appointment or nomination to public office – 45 measures.



Two appeals were submitted to the Council of the Agency against the decisions of the Agency's Director imposing measures on public officials, of which one appeal was rejected, and the other was rejected by the Agency as a first-instance body.

Due to violation of misdemeanor provisions of the Law on Prevention of Corruption in this area, a total of 153 requests for initiation of misdemeanor proceedings were submitted due to failure to submit a Report or notification within the prescribed period, i.e. submission of an incorrect or incomplete Report.

Misdemeanor courts made a total of 169 decisions based on requests to initiate misdemeanor proceedings submitted for violation of misdemeanor provisions of the Law on Prevention of Corruption in the area of assets and income of public officials before and during 2025.

At the proposal of public officials, against whom the Agency submitted requests for initiation of misdemeanor proceedings due to untimely submission of reports, the Agency based on Art. 233 and 234 of the Law on Misdemeanors, Article 108 of the Law on Prevention of Corruption and the Instructions on the Procedure for Concluding Agreements on Recognition of Misdemeanors, concluded three Agreements on Recognition of Misdemeanors with the defendants, for whom the fines are imposed.

Ten criminal complaints / reports were submitted to the competent prosecutor's offices due to the existence of grounds for suspicion that a public official, with the intention of concealing assets and income, did not report assets and income to the Agency or provided false information about assets and income, i.e. due to the existence of grounds for suspicion that he committed some other criminal offense for which prosecution is undertaken ex officio.

Seven reports were submitted to other competent state bodies due to the suspicion that public officials committed some other criminal act, namely to the Tax Administration – three reports and to the Administration for the Prevention of Money Laundering – four reports.

During the year 2025, the Agency was informed about the outcome of proceedings based on criminal reports and Agency reports in 19 cases.

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
2025	1	2	11	2	1	1	1
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

EXAMPLES FROM PRACTICE

Based on the authority from the provisions of Art. 36 and 75 of the Law on Prevention of Corruption, the Agency requested data from the competent authorities on the recorded assets of a public official, his wife and minor children living in the same family household.

During the check, in the phase of obtaining data and documentation, both from the public official and from other state bodies, it was observed that the public official, during the performance of his public office, disposed of immovable property in his ownership on several occasions. The value of the last immovable property is significantly higher than the immovable property that was reported in the first Report, while, according to the data of the competent state authority, the income of the person from the Report did not increase in an amount that would justify the difference in value.

It was further determined that based on the public authority he exercised, the public official was in a situation to influence the value of the real estate that he later acquired by buying and selling, and which he reported in his last report. Namely, on the basis of several purchase and sale contracts in the same residential building, for real estate of a similar area, acquired in the same period of time when the public official also acquired it, it was established that the price of the public official's residential unit, per square meter and total amount, is many times lower than the price paid by other natural and legal entities.

Requests for initiation of misdemeanor proceedings (Act on Prevention of Corruption) in 2025	
Area	Number of requests
Registration and verification of assets and income	153
Conflict of interest	10
Integrity Plan	3
Training	1
Cooperation with the Agency	1
Total	168

Decisions of misdemeanor courts in 2025	
Convictions	193
Fines	125
Reprimands	68

GIFTS

A gift is an item, right or service, given or provided without appropriate compensation and/or a benefit or advantage afforded to a public official or his/her family member. A public official and a family member may not receive a gift in connection with the performance of a public office, with the exception of protocol and special gifts. Received gifts become public property, in accordance with the law governing public property. The Law on Prevention of Corruption stipulates the conditions under which a public official can keep a gift.

It is the duty of a public official to notify the public authority in which he holds a public office in writing about any gift received in connection with the performance of his public office. Public authorities keep records of gifts received by public officials and members of their families, and are obliged to submit a copy of the records for the previous year to the Agency no later than March 1 of the current year, based on which the Agency maintains and publishes the Catalog of gifts of public officials for the previous year.

In 2025, the Agency published the Catalog of Gifts for 2024, which includes 710 protocol and occasional gifts, which public officials from 49 bodies of all levels of government, during 2024, received in connection with the performance of their public office.

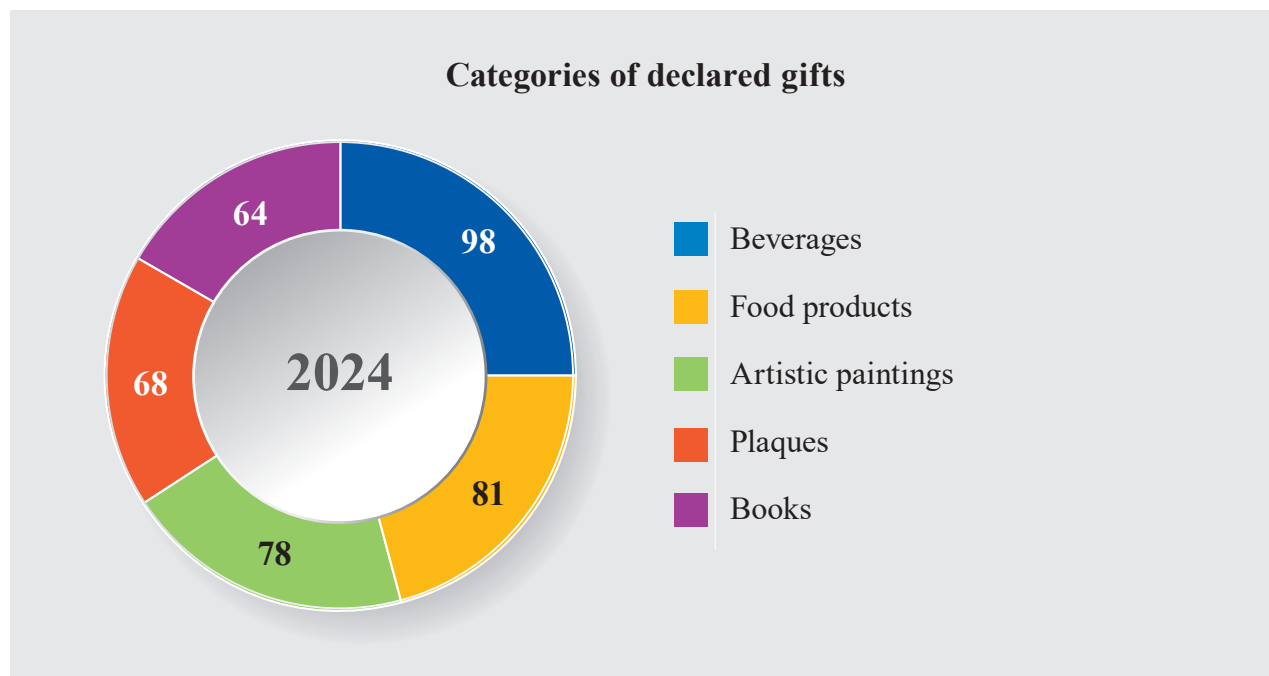
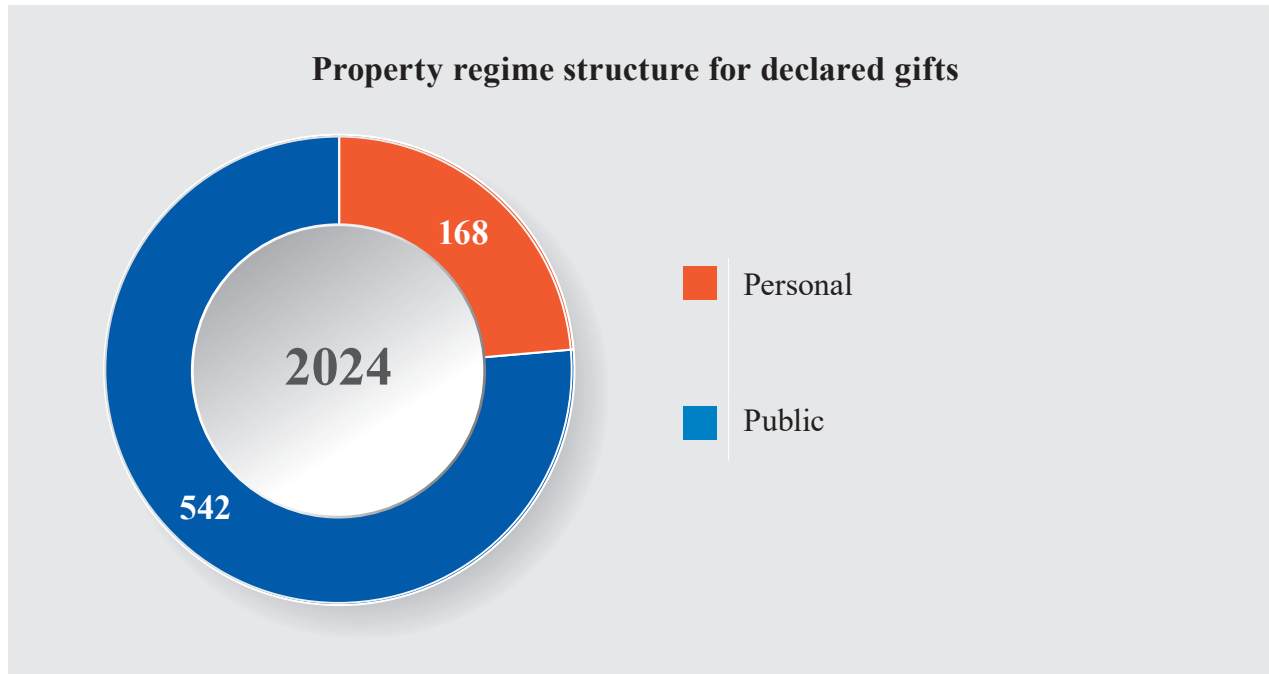
In the reporting period, the General Secretariat of the President of the Republic reported the largest number of gifts (142), followed by the General Secretariat of the Government of the Republic of Serbia (72) and the Ministry of Defense (58).

The Agency has also created a statistical analysis of the catalog of gifts registered for 2024, which includes statistical processing of data from the catalog of gifts, taking into account its most important elements, as well as their comparison in relation to previous years.

The statistical analysis of the Gift Catalog for 2024 shows: number of gifts by year and month, division of gifts by type, level of government, range of estimated value and property regime, display of authorities that submitted records, list and gender dimension of public officials who received gifts and overview of reported gifts.

Out of the total number (710) of gifts received in connection with the performance of a public office, there are more protocol gifts (531) than occasional gifts (179). Of this number, 542 were transferred to public ownership, while public officials kept 168 gifts. The largest number of gifts was transferred to public property by the President of the Republic (142), and viewed by type of public office – ministers (total) – 138. When it comes to gifts kept in personal property, the most gifts were kept by ministers – a total of 61 gifts, followed by assistant ministers with 31 gifts and Directors with 30 gifts.

The value of the gifts ranges from 0.00 to 600,000.00 RSD, while the estimated monetary value of the largest number of gifts is in the range from 0.00 to 3,000.00 RSD, of which there are 236. For 100 gifts, the estimated monetary value was not determined until the analysis was made.



You can view the conclusions contained in this analysis on the Agency's website: https://www.acas.rs/cyr/page_with_sidebar/istrazivanja

CONTROL OF FINANCING OF POLITICAL ACTIVITIES

Control of the financing of political entities and monitoring of their cash flows is an important factor in strengthening transparency and preventing corruption.

Relying on the legal powers prescribed by the Law on Prevention of Corruption and the Law (LPC) on Financing of Political Activities (LFPA), the Agency controls the costs of regular operations and election campaigns. Accordingly, political entities are obliged to report to the Agency on all income and expenditure through annual reports on financing (AFR), as well as through preliminary and final reports on campaign expenses. Political entities are obliged to submit annual reports by April 30 of the current year for the previous year. The preliminary report on campaign expenses is submitted no later than seven days before election day, while the final report on campaign expenses is submitted 30 days after the announcement of the overall election results.

At the content level, the Agency controls the collected data by cooperating with state administration and local self-government bodies, banks, service providers and other relevant institutions.

In the previous year, the annual reports on the financing of political entities – registered political parties and groups of citizens that have representatives in representative bodies – were controlled. The 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.

A total of 343 political entities, i.e. 123 political parties and 220 citizen groups, had the legal obligation (LFPA) to submit an annual report on financing for 2024.

The annual report on financing was submitted by 226 political entities, of which 89 were political parties and 137 were citizen groups. The report was not submitted by 117 political entities, of which 34 political parties and 83 citizens' groups.

By controlling the annual reports on financing, the Agency included the reports of 26 political entities, 21 of which refer to the year 2024, and five to the year 2023. The control of the annual financing reports for the year 2024 covered 93.25% of the total revenues and 91.39% of the total expenditures made by all political entities that submitted the AFR for the year 2024.

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 the annual reports on the financing of political entities for the year 2024, which were submitted on form I-1 in accordance with the Rulebook on records and reports of political entities, is carried out. They are submitted by political entities with the highest reported income and expenses in 2024, then by political parties

that have their own councilors in the parliament, as well as by political parties that were subject to control by the State Audit Institution – for which notifications were submitted to the Agency, and by the method of random sampling.

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 Control of Annual Reports on Financing of Political Entities for 2024.

In 2025 in the Republic of Serbia, local elections were held for councilors of the Assembly of the City of Zaječar and the assemblies of the municipalities: Kosjerić, Negotin, Mionica and Sečanj.

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



The legal obligation (LFPA) to submit a preliminary and final report on election campaign expenses had 26 political entities. The preliminary report was submitted by 19 political entities, i.e. 73.1%, while the final report was submitted by 19 political entities, i.e. 73.1%.

In 2025, the Agency controlled submitted reports on the costs of election campaigns for the elections held in 2024 and 2025.

The control of these reports was carried out in accordance with the control plans and the supplement to the control plan of election campaign expenses for 2024 and 2025, which were published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti.

The control of election campaign costs, i.e. the income and expenses of political entities includes formal and substantive control, which means crossing the data presented by political entities in reports 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.

By controlling the costs of election campaigns, the Agency included the reports of 52 political entities, of which 41 reports refer to the year 2024, and 11 to the year 2025. The results of the control report on the costs of election campaigns on the occasion of the elections held in 2024 and 2025 have been published in accordance with the Law on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti.

In order to increase the transparency of the financing of the election campaign expenses on the occasion of the elections held in Zaječar and Kosjerić, the Agency has published on its website the reports of the Agency's field observers, engaged to monitor and collect information and data on the ground related to the election campaign expenses of political entities that participated in these elections. Observer reports can be found at the link https://www.acas.rs/cyr/pages/lokalni_izbori2025-_zaječar_i_kosjerić

In addition to the analysis of sources of financing and costs of election campaigns of controlled political entities, the reports contain an overview of observed irregularities and possible violations of the LFPA, as well as data on submitted requests for initiation of misdemeanor proceedings before the competent court and proceedings initiated before the Agency.

Due to the violation of provisions of the LFPA, the Agency submitted a total of 148 requests for initiation of misdemeanor proceedings, of which:

- 76 reports submitted for failure to submit annual reports on election campaign financing;
- 26 requests were submitted due to non-submission of final reports on election campaign expenses;
- 10 requests were submitted due to non-submission of preliminary reports on election campaign expenses;
- 15 requests were submitted because the final report on the expenses of the election campaign did not show all the data;
- five requests were submitted due to prohibited financing in the election campaign;
- four requests were submitted due to non-marking of advertising material in the 2025 election campaign;
- three requests were submitted due to misuse of public resources in the 2023 election campaign;
- two requests were submitted due to non-use of at least 5% of the funds received for regular work from public sources for professional development and work with membership,
- the remaining seven claims were filed for other LFPA violations.

Also, due to violations of the LFPA, the Agency issued 34 reprimands against political entities in the regular procedure, with the application of the Law on General Administrative Procedure, of which 18 were issued due to established violations of the LFPA in connection with annual financial reports, while the remaining 16 refer to violations of the LFPA in connection with reports on election campaign expenses.

On the basis of legally binding judgments that imposed a fine, 27 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 legally binding judgment of the misdemeanor court that imposed a fine, and if the political party, i.e. a group of citizens, has representatives in the representative bodies).

The aforementioned decisions are 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 gave 20 answers and opinions on the application of the provisions of the LFPA.

Based on the submitted requests for initiation of misdemeanor proceedings for violation of the Law, the Agency received 103 legally binding verdicts, of which 45 are at the legal minimum, 6 above the legal minimum, 39 below, 11 reprimands and two acquittals.

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, 35 participants successfully completed the online training on the topic of the implementation of the LFPA.



Notification of the Tax Administration

In accordance with the provisions of the LFPA, the Agency informed the Tax Administration of the Republic of Serbia about the donors of contributions to political entities in 2024, which are contained in the annual reports on the financing of political entities, as well as reports on the expenses of the election campaign of political entities, which were subject to control.

PROCEDURES RELATED TO THE ELECTION CAMPAIGN

During the year 2025, elections were held for councilors of the Assembly of the City of Zaječar and the assemblies of the municipalities of Kosjerić, Negotin, Mionica and Sečanj.

For the tenth time since its establishment, the Agency has organized and implemented monitoring of the election activities of political entities who participated in the elections for councilors of the Assembly of the City of Zaječar and the Municipality of Kosjerić. For monitoring purposes, two field observers were engaged in Zaječar and Kosjerić.

On the basis of the reports submitted due to the suspected violation of the LFPA, in connection with the election campaigns for councilors of the City of Zaječar and the assemblies of the municipalities of Kosjerić, Negotin, Mionica and Sečanj, the Agency made eight decisions. Of the decisions made, in three cases a measure of reprimand was issued, in two cases a violation of the LFPA was established and is the basis for submitting a request to initiate misdemeanor proceedings, while in three cases it was determined that there was no violation of the LFPA.

Decisions made on applications related to election campaigns are published on the website and are available on the links

https://www.acas.rs/cyr/pages/lokalni_izbori2025-_zaječar_i_kosjerić-_odluke_po_prijavama and www.acas.rs/cyr/pages/lokalni_izbori2025-_negotin,_mionica_i_sečanj-_odluke_po_prijavama.

Also, the Agency, ex officio, i.e. based on the report of the observers it engaged to monitor the activities during the election campaign for councilors of the Zaječar City Assembly and the Kosjerić Municipality Assembly, submitted four requests against political entities to the competent misdemeanor court for the initiation of misdemeanor proceedings due to non-marking of advertising material.

In connection with the procedures that were conducted based on applications in the election campaign, the Agency has established and publicly published on its website a Register – Overview of procedures for submitted applications in the election campaign, in order to ensure greater transparency and responsibility in its work. The publication of this register enables the public to gain insight into the Agency's handling of applications received during the election campaign, as well as monitoring the stages and outcomes of those procedures. When publishing information about the course of the procedure, the Agency takes care of the protection of personal data.

The register is published on the link

www.acas.rs/cyr/pages/lokalni_izbori2025-_negotin,_mionica_i_sečanj-_odluke_po_prijavama

The Agency prepared and published on its website the Analysis of Irregularities in the Financing of Political Activities from the Agency's competence domain. The analysis is published on the link https://www.acas.rs/storage/page_files/Analiza%20nepravilnosti.pdf

LOBBYING

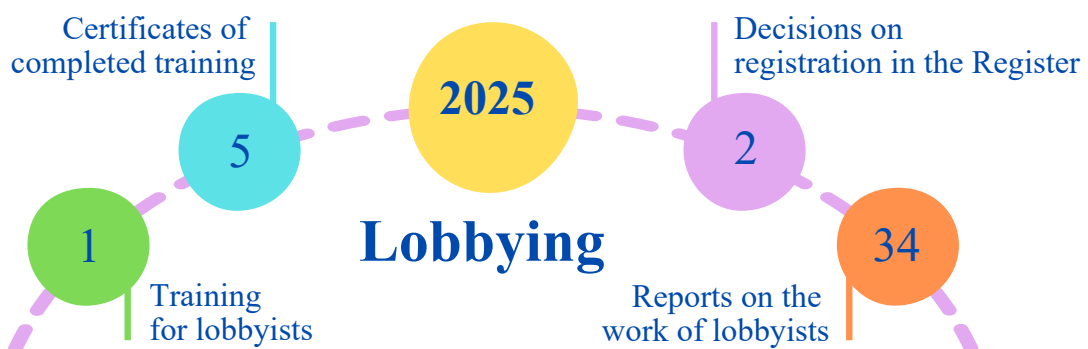
Lobbying is an activity that exerts influence on the authorities of the Republic of Serbia, autonomous provinces and local self-government units, bodies of holders of public authority, whose founder is the Republic of Serbia, autonomous province, or local self-government unit - authority in the process of adopting laws, other regulations and general acts, within the competence of those authorities, in order to achieve the interests of lobbying users.

By adopting the *Law on Lobbying* and its implementation, the Republic of Serbia passed the test of maturity of a democratic state, which is well on its way to no longer putting a sign of equality between lobbying and corruption, because an institutional framework has been created that minimizes the possibility of corruption.

The statutory regulation of lobbying protects the public interest to the greatest extent, since it increases the publicity of the work of the state administration bodies, strengthens the integrity and responsibility of the lobbied persons and raises the trust of citizens in the decision-making process, i.e., the rules regarding lobbying are established.

In the reporting period, one training for lobbyists was held, attended by three candidates. Upon completion of the training and verification of knowledge of the content of the Training Program, five candidates obtained a Certificate of Completion of Lobbyist Training, of which two candidates completed the training in the previous period. Two decisions on registration in the Register of Lobbyists and one decision on deletion from the Register of Lobbyists were adopted. As of December 31, 2025, a total of 49 individuals were registered in the Register of Lobbyists, while one legal entity was registered in the Register of Legal Entities that carry out lobbying. 34 Reports on the work of lobbyists for the year 2024 were submitted to the Agency, one of which is a report of a legal entity that carries out lobbying. The Agency received one notification from the lobbyist about the first lobbying contact.

In 2025, among others, the Agency prepared an online training in the field of corruption prevention – Training for lobbied persons, which is available from December 9, 2025 on the Agency's website – a distance learning application, with the aim of improving knowledge about the obligations of lobbied persons in public authorities in the lobbying process.



CORRUPTION RISK ASSESSMENT IN LEGISLATION

The assessment of the risk of corruption in legislation has a special place as a preventive mechanism that allows to recognize, reformulate, supplement or remove norms that could generate risks of corruption already at the stage of adopting laws and by-laws, but also after their adoption.

Since its establishment, the Agency for Prevention of Corruption has been actively involved in that process, developing its own methodology and improving mechanisms for identifying risks of corruption in legislation and removing them from legislation.

The assessment of the risk of corruption in legislation has multiple significance for the rule of law and the system of preventing and fighting corruption. This importance is reflected in the contribution of the assessment, i.e. the opinions given and initiatives submitted by the Agency for the adoption of legislation without established corruption risk factors, i.e. legislation whose provisions do not contribute to or legalize established risks of corruption (punishable behavior).

In 2025, the Agency sent seven opinions to the proposers of the law on the assessment of the risk of corruption in legislation and submitted one initiative to amend the current law, namely:

- Opinion of May 19, 2025, given at the request of the Ministry of Economy, on the Draft Regulation on the conditions, qualifications and activities of the Commission for the Adoption of Guidelines, which establishes the general annual goals of capital companies;
- Opinion of July 18, 2025, given at the request of the Ministry of Education, on the Draft Law on Amendments to the Law on Textbooks;
- Three opinions issued at the request of the Ministry of State Administration and Local Self-Government: opinion dated January 28, 2025 on the Draft Law on Amendments to the Law on Free Access to Information of Public Importance, opinion dated November 3, 2025 on the Draft Law on Amendments to the Law on Civil Servants and opinion dated November 3, 2025 on the Draft Law on Amendments to the Law on Salaries of Civil Servants and Officials;
- Two opinions given at the request of the Ministry of Justice: opinion dated December 3, 2025 on the Draft Law on Amendments to the Law on Lobbying and opinion dated December 3, 2025 on the Draft Law on Amendments to the Law on Prevention of Corruption;
- Bearing in mind the allegations of the complaint in which possible illegalities were pointed out in connection with the adoption of the Statute of the Cultural Center of the Municipality of Beočin and in this connection the identified risk factors of corruption in the relevant provisions of the Law on Culture, on June 20, 2025, the Agency submitted to the Ministry of Culture an Initiative to amend the Law on Culture.

In this regard, the analysis of the Draft Law on Amendments to the Law on Lobbying found that in its text it fully adopts the previously submitted Initiative of the Agency from July 28, 2023, whose recommendations are aimed at achieving a higher degree of transparency in the domain of lobbying through the notices that the Agency publishes on its website – the notices that it received from the lobbied person about the receipt of the letter starting lobbying; publishing by the author-

ity, without delay, on its website, records of lobbying contacts for officials who were elected, appointed, nominated or (otherwise) employed in that authority; as well as through publication, on the Agency's website, of the report on the work that the lobbyist, i.e. the legal entity that performs lobbying, submits to the Agency.

Also, through the analysis of the Draft Law on Amendments to the Law on Prevention of Corruption, it was determined that in its text it adopts the Agency's recommendations from the previously submitted initiative of July 9, 2024, which refer to the amendments to Article 35 of the Law, in terms of prescribing the duties of the state administration body, to which the Agency submitted the initiative, to inform the Agency within 30 days from the day of its receipt of the acceptance, i.e., of the reasons for not accepting the initiative, as well as prescribing the duties of the state administration body, to the Agency submit a statement on the Agency's opinion on the assessment of the risk of corruption on the draft law that the said authority submits to the Agency. The aforementioned recommendations were given in order to improve the transparency of the decision-making process in practice.

As part of the implementation of the Suppression of Economic Crime in Serbia project, financed by the Kingdom of Sweden, represented by the Swedish Agency for International Development Cooperation, and implemented by the Council of Europe, on March 18, 2025, as part of the implementation of the activity Improving the assessment of the risk of corruption in legislation, a training was held for employees of the Agency, where the Methodology for assessing the risk of corruption in the application of legislation, prepared by the experts of the Council of Europe, was presented. The proposed methodology differs from the current Methodology for assessing the risk of corruption in legislation primarily because it refers exclusively to current legislation. After testing on a specific regulation, the proposed methodology will be adopted in its final form and used as an additional tool for assessing the risk of corruption in legislation.

COMPLAINTS

By submitting complaints to the Agency, natural and legal persons are enabled to state facts that cause suspicion of corruption and inform the Agency of certain irregularities in the work of public authorities.

In 2025, a total of 359 applications were submitted to the Agency, the largest number of applications were submitted electronically, by sending emails to the Agency's e-mail address, as well as via a form "Report corruption" available on the Agency's website. Out of the total number of applications received, as many as 127 applications (35.57%) were submitted anonymously.

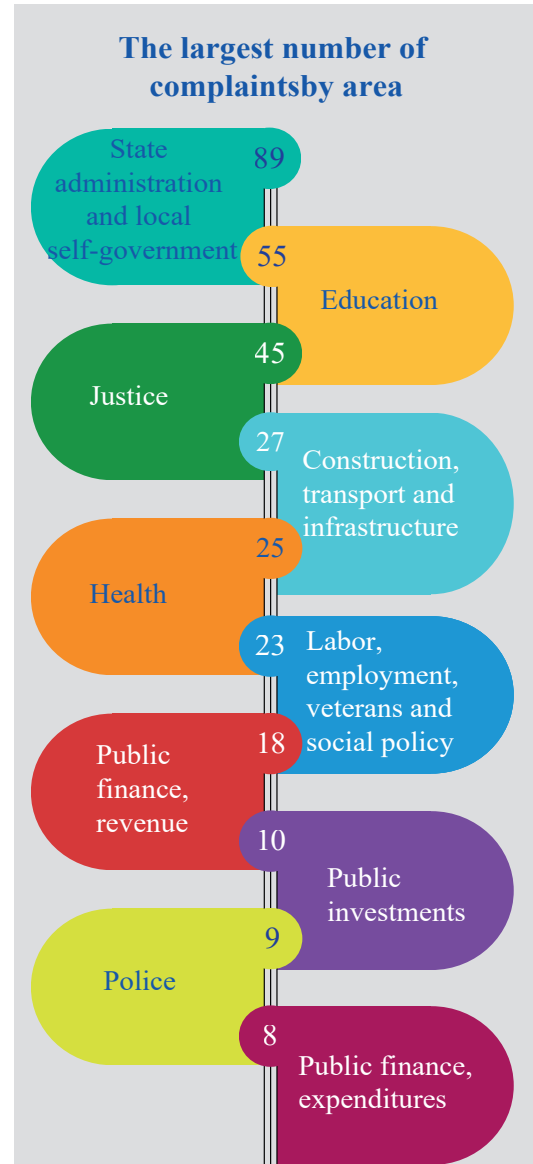
The largest number of all submitted complaints related to the competences of inspection authorities and prosecutor's offices.

The Agency forwarded complaints to the inspection authorities in order to take measures within their jurisdiction, to supervise the work of the public authorities to which the complaint refers, and gave certain recommendations for eliminating irregularities in the work.

The Agency forwarded complaints to the competent prosecutor's offices in order to take measures and actions within their jurisdiction, and based on the allegations of one of the complaints, the Agency, after collecting information, filed criminal complaints against three persons with the Public Prosecutor's Office for Organized Crime. JTOK informed the Agency that the criminal complaint against one person was dismissed, and that in relation to the other two persons, the criminal complaint was transferred to the jurisdiction and further proceedings of the Higher Public Prosecutor's Office in Belgrade, Special Department for Suppression of Corruption.

When forwarding complaints for action, the Agency protected the identity of the complainant, as prescribed by the Law on Prevention of Corruption, except in cases where the complainant gave consent for identity disclosure.

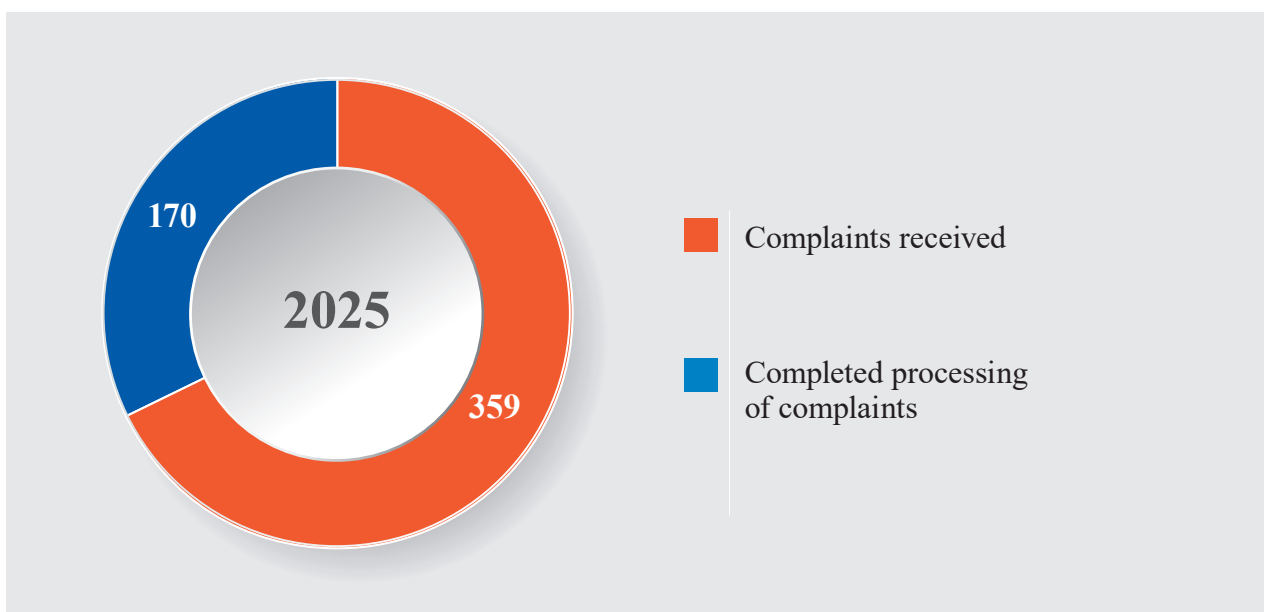
In the reporting period, proceedings in 170 cases from 2025 and previous years were terminated because it was determined that there was no evidence for the allegations in the complaints, or that the allegations were unfounded.



The analysis of the structure of the submitted complaints by the areas they refer to shows that trends from previous years have mostly continued. Namely, most of them are from the field of state administration and local self-government (24.79%), education (15.32%), justice (12.53%), construction, transport and infrastructure (7.52%), health (6.96%) and the field of work, employment and social policy (6.40%). Considering that the record of complaints by area is kept based on the predominant content of the complaint, as well as the fact that the largest number of complaints refers to more than one area, it should be noted that in a large number of complaints, the area of inappropriate spending of budget funds (public finances) appears as another area.

Structure of applications by area:

1. Public finance, revenues – 18
2. Public finance, expenditures – 8
3. Public finances, property – 7
4. Economy – 8
5. Agriculture, forestry and water management – 5
6. Environmental protection – 2
7. Mining and energy – 4
8. Trade – 2
9. Judiciary – 45
10. State administration and local self-government – 89
11. Police – 9
12. Education – 55
13. Health – 25
14. Work, employment, veterans and social policy – 23
15. Sport – 5
16. Culture – 1
17. Tourism – 1
18. Public investments – 10
19. Construction, traffic and infrastructure – 27
20. Miscellaneous – 15



STRENGTHENING INTEGRITY

The integrity plan and training on ethics and integrity are two important anti-corruption mechanisms that the Agency applies with the aim of strengthening institutional and personal integrity. The consistent implementation of these preventive mechanisms affects the preservation of integrity, institutional sustainability and increasing citizens' trust in the work of institutions.

The first step in the preparation of the integrity plan is the analysis of the risk of corruption. With it, institutions identify critical points in their functioning. The development and implementation of the integrity plan, that is, the definition of adequate measures for the management of identified risks and the implementation of the plan itself, contribute to the improvement of institutional efficiency and ensure transparent and responsible functioning of the institution.

At the same time, training on ethics and integrity improves the professional standards of behavior of managers and employees in public authorities, and encourages ethical behavior, responsibility and awareness of the risks of corruption.

INTEGRITY PLAN

The key component for the systematic introduction of the mechanism of good governance in the work of institutions is the development and implementation of an integrity plan, the implementation of which contributes to the reduction of the risk of corruption and the more efficient functioning of institutions in the public sector.

The integrity plan is a preventive mechanism based on self-assessment of the risk of corruption and other irregularities, which includes a comprehensive analysis of the institution's work, determination of risk areas, and planning and implementation of measures to eliminate them. The collected data from the integrity plans provide an important insight into the state of integrity in the public sector and enable recognition of common and systemic challenges in certain areas. After each cycle, the Agency analyzes the prepared / implemented plans and formulates recommendations for their further improvement.

It is a document that is periodically reviewed in accordance with changes in the normative, institutional, organizational and personnel domain, inside and outside the institution. One cycle of its development and implementation lasts three years: in the first year, institutions assess risks and determine measures for their management, while in the following two years the planned measures are implemented. Since the beginning of the work of the Agency, three cycles of preparation and implementation of integrity plans have been successfully completed.

During 2025, the Agency supervised the implementation of the prepared integrity plans in the third cycle.

In the same year, three trainings were held for heads of institutions, "The head as a driver of building institutional integrity" and workshops with the aim of improving the content of the draft (model) integrity plan.

Oversight over the implementation of integrity plans

In the course of 2025, oversight was carried out over the implementation of measures from integrity plans in 12 institutions.

Direct oversight, which was carried out through interviews with employees and inspection of documentation, included 10 institutions from five systems – state administration and local self-government, social policy, health, education and science, as well as public companies – in six cities: Zrenjanin, Tutin, Sjenica, Bajina Bašta, Sokobanja and Kikinda.

Intermediate (administrative) oversight was carried out in two more institutions from Kragujevac and Niš, and included an analysis of the integrity plan, a report on its implementation, the working group's answers to practical questions, employees' answers to an anonymous questionnaire, documentation submitted in accordance with the Agency's questionnaire, as well as an insight into the internet presentations of those institutions.

The aim of the oversight is to determine how the improvement measures in the integrity plans are implemented (whether they were implemented within the stipulated deadlines and in what way, and if not – what are the reasons for their non-implementation). After the oversight, the Agency prepared an individual report for each institution, which contains recommendations and remarks for improving their integrity.

In their integrity plans, the institutions envisaged a total of 448 improvement measures, of which 145 measures were implemented, 204 were not implemented, 66 were inadequate, 32 measures were partially implemented, while data for one measure was not available, so it was not possible to evaluate it.

Out of a total of 145 implemented measures, 68% (99) were implemented within the time limit set by the integrity plan, 28% (40) were implemented after the set time limit, while 4% (six) were implemented periodically, which indicates that the institutions most often correctly estimated the time needed to implement certain measures.

448 improvement measures

✓ Implemented (145 measures) **32%**

✗ Not implemented (204 measures) **46%**

📊 Partially implemented (32 measures) **7%**

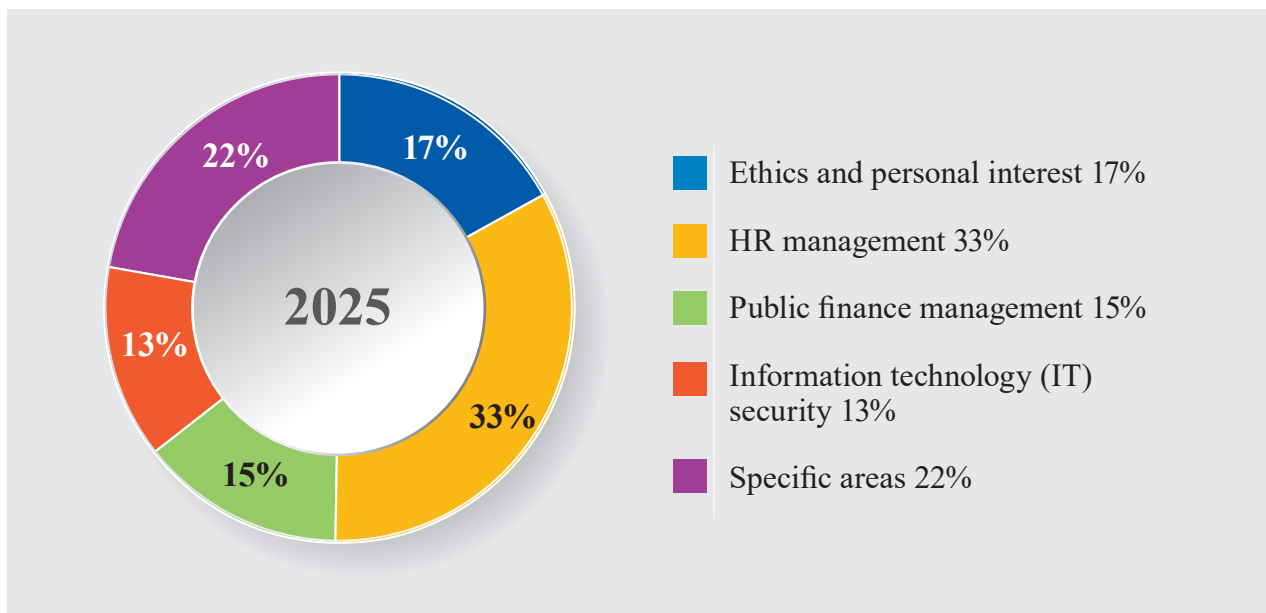
👎 Inadequate (66 measures) **15%**

? Data not available **1 measure**

Most of the measures were implemented in the area of ethics and personal integrity (59%), primarily in connection with the regulation of receiving gifts and conflicts of interest of employees. After that, there are measures in the field of personnel management (14%) – especially in the process of hiring and regulating the work outside the employment relationship of persons who are hired outside the public authorities – and in the field of information technology (IT) security (10%). In the management of public finances, 9% of measures were implemented, mainly in connection with public procurement and handling of financial resources obtained from EU funds and other international funds.

It was observed that the institutions in their integrity plans also listed the measures they are already implementing. The majority of such inadequate measures are in the process of budget planning and execution, as well as in the processes of information technology (IT) security and handling of financial resources obtained from EU funds and other international funds. The above indicates that the institutions, when assessing the risk of corruption and other irregularities, did not conduct a comprehensive analysis of existing measures to prevent risks in those processes.

Through individual reports, the Agency gave 332 recommendations and remarks, of which 53 refer to the failure to prepare and implement the integrity plan, while the remaining 279 refer to specific areas. Of the total number of recommendations by area, most of them refer to personnel management, 33% (93), as well as areas specific to a certain type of institution, 22% (62). The fewest recommendations were given in the area of information technology (IT) security 13% (36), which is shown in the graph.



These findings represent the basis for reviewing the scope, structure and quality of implemented measures, as well as for noticing common patterns, deficiencies and risks in areas key to the functioning of institutions. At the same time, they represent a significant source of information for improving the methodology, as well as the way of developing and implementing the integrity plan.

Distance training: Developing and Implementing an Integrity Plan

In order to provide support to institutions in the development and implementation of the integrity plan, distance training was created for the education of employees and managers in public authorities on the integrity plan.

The training includes structured textual content and educational animations arranged in four lessons that follow the development and implementation of the integrity plan by stages. The training covers in an accessible way the concept and importance of the integrity plan, forms of corruption, assessment of the risk of corruption and other irregularities, measurement of risk intensity, determination of measures to prevent them, as well as the roles and responsibilities of employees and managers in the process of its preparation and implementation.

It was installed on the *Moodle* platform, which enables continuous and simple access to educational content for a large number of employees in institutions, with the possibility of independent learning in accordance with individual dynamics. In this way, it is possible to monitor the implementation of the training, as well as its effects on the development of the integrity plan in the institutions.

Conducted workshops on enhancing the content of the integrity plan

In order to improve the content of the draft integrity plan for the fourth cycle, the Agency, with the support of the OSCE mission in Serbia, continued work on mapping work processes that are exposed to risks of corruption and other irregularities. During March and May 2025, workshops were held in Šabac and Kraljevo, with four working groups consisting of representatives of the System of State Administration and Local Self-Government, the Health System, the System of Social Policy and the System of Public Enterprises.

44 representatives from 28 institutions responded to the Agency's invitation and gave their contribution by actively participating with concrete proposals.

The recognized risk processes and their content will be an integral part of the draft (model) integrity plans that these systems will use in the fourth cycle of its creation and implementation.

Integrity plan training for managers

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

In 2025, the Agency organized three trainings "The manager as a driver of building institutional integrity".

61 managers improved their knowledge and understanding of authority and responsibility in the process of developing and implementing an integrity plan and creating an organizational culture in the institutions they manage.

LOCAL ANTI-CORRUPTION PLAN (LAP)

The local anti-corruption plan¹ (hereinafter: LAP) is a preventive anti-corruption mechanism by which the units of local self-government and territorial autonomy strengthen their resistance to the occurrence of corruption and other irregularities.

In accordance with activity 2.2.10.31. Action Plan for Chapter 23, the Agency collects data and reports on the monitoring and implementation of LAPs, as well as the formation of bodies for their monitoring. The Agency developed and published the LAP² model, which is based on the identification of normative, institutional and organizational risks for the emergence of corruption and the implementation of measures to eliminate the causes of corruption. In addition to the LAP model, a methodology was also published in which the obligations and responsibilities of actors involved in monitoring and reporting on the implementation of the LAP are described in detail, the procedure for monitoring the implementation of the LAP at the level of activities, measures and goals, as well as the reporting process, is presented.³

In the reporting period, two reports were prepared on the adoption of the LAP and the formation of a body to monitor its implementation.

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

In the course of 2025, two local self-government units (hereinafter: LGUs) reported to the Agency on the adoption of LAP. Upon inspection of the submitted documents, it was determined that the Municipality of Žagubica adopted the LAP in 2025, while the Municipality of Vrnjačka Banja revised the existing one for the period from 2025 to 2028.

In the period from the beginning of April 2017, when the Agency published the LAP Model, until June 20, 2025, a total of 118 LGUs adopted the LAP, i.e. 81% of the 145 LGUs that are subject to this obligation (without the territory of Kosovo and Metohija).

Out of a total of 118 LAPs submitted by LGUs to the Agency, 102 (86%) were prepared in accordance with the LAP Model, 12 (10%) were partially prepared in accordance with the Model, three adopted plans (3%) do not correspond to the Model either in terms of form or content. In addition, one LGU (1%) did not submit enough data to make an assessment on whether the LAP was prepared in accordance with the Model.

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

2 The LAP model is available on the Agency's website: https://www.acas.rs/cyr/pages/1_a_p_izveštaji

3 *Ibid.*

A total of 43 LGUs formed a body that will be in charge of monitoring the implementation of LAP, of which 29 were formed mainly in accordance with the Agency Model, two partially, nine with significant deviations, while for three there is not enough data to give an assessment of compliance.

Taking into account the above, 29 LGUs adopted the LAP and formed a body to monitor its implementation, mostly in accordance with the Agency Model, thus fulfilling their obligation from activity 2.2.20.31. Action Plan for Chapter 23.

In the Action Plan for Chapter 23, there are no clearly stated instructions related to the actions of LGUs after the end of the period of implementation of LAP activities, which would imply the creation of a new LAP or revision of the existing one. The above, among other things, had the effect that in 2025, only the Municipality of Vrnjačka Banja audited its LAP.



**REPUBLIC OF SERBIA
THE AGENCY
FOR PREVENTION
OF CORRUPTION**

EDUCATION

The basis for the establishment and development of a sustainable ethical infrastructure in public authorities is the education of employees in the field of ethics and integrity. Continuous training and systematic investment in professional development improve the standards of professional behavior and encourage the development of employees' behavioral competencies. Such an approach contributes to strengthening the ethical culture and increasing citizens' trust in the work of institutions. Viewed in the long term, education is a powerful instrument for improving the behavior of employees and strengthening their personal integrity.

The following results were achieved:

- Distance training "Ethics and integrity" was attended by 26,267 employees in public authorities during 2025.
- A new group of eight educated implementers of ethics and integrity training was trained.
- The Report on the Implementation of the First Cycle of Ethics and Integrity Training in Public Authorities (2021–2023) was prepared.

In accordance with the Instruction for conducting training in the field of preventing corruption and strengthening integrity, the authorities of the Republic of Serbia, autonomous provinces, local self-government units and city municipalities had the obligation to implement the "Ethics and Integrity" training. Users were continuously provided with technical support by telephone and e-mail, with regular updates of the participant database.

In addition, 17 trainees, i.e. employees in public authorities, attended the training "Socially sensitive groups and corruption".

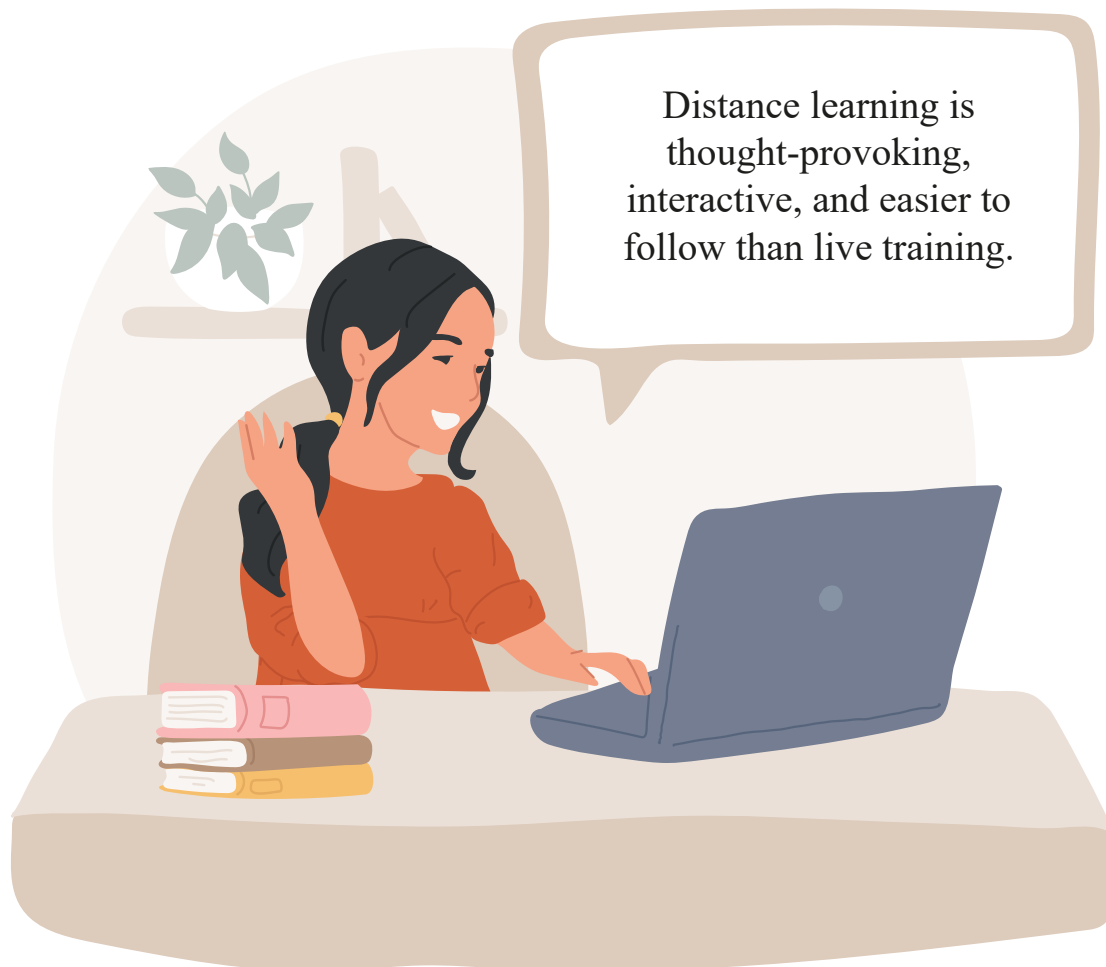
The Agency also conducted the 19th training for lecturers (training for trainers) in the field of ethics and integrity, which was successfully completed and acquired the status of educated implementer in the field of ethics and integrity by eight employees from the Tax Administration, the State Audit Institution, the Joint Stock Company "Elektromreža Srbije", the Institute for Rehabilitation, Public Utility Company (PUC) City Traffic Company "Beograd".

The Report on the implementation of the first training cycle "Ethics and Integrity" in public authorities for the period 2021–2023 was prepared. The findings from this report served as the basis for designing a new approach to training, aimed at better planning, coordination, accessibility and support for participants, with the aim of not only effectively conducting the training, but also contributing to the permanent strengthening of the culture of integrity in the public sector.

A meeting was held with representatives of the Customs Administration of the Republic of Serbia, following their initiative to place the "Ethics and Integrity" training on their distance learning platform.

Comments of training participants (taken from the Report on the implementation of the first cycle of training "Ethics and integrity" in public authorities for the period 2021–2023)

During the implementation of the "Ethics and integrity" training, the participants shared their observations about the training with the employees of the Agency through communication channels (telephone, email, forum within the distance training). They shared their opinions on the training materials, including how much they liked them, which areas they found challenging, and how easily they navigated the training platform.



In their comments, the assessment that it is a carefully designed program that provides new knowledge, but also topics for deeper reflection on daily practice and one's own behavior, appears most often. However, the impressions are not unanimous. While some emphasize that they will be able to immediately apply the acquired knowledge in their work environment, others expressed doubts about its practical effectiveness, considering that the effects will be limited or even negligible. A certain number of comments also refer to technical difficulties. Attendees indicated problems with accessing the user account. In the comments, it can be seen that the film about the values and role of employees in public authorities, which follows the first lesson, attracted special attention. According to the assessment of some participants, his influence was so strong that as an educational material it could find a place on television programs, which would make his message available to the general public.

INTERNATIONAL COOPERATION

Participating in all activities within the negotiations of the Republic of Serbia for membership in the European Union, during the past year the Agency presented the results of its work through reporting on the implementation of the Revised Action Plan for Chapter 23 (subchapters Justice, Fight against corruption and Fundamental rights). With the aim of establishing a system for monitoring results and cases from the scope of the Agency's work, reports on the implementation of transitional measures for Chapter 23 in the area of conflicts of interest, reporting and verification of assets and income of public officials, especially judges and prosecutors, as well as control of the financing of political activities, in cooperation with the Supreme Public Prosecutor's Office and misdemeanor courts, were prepared on a semi-annual basis.

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

A contribution was prepared for the European Commission for the Efficiency of Justice (CEPEJ) for 2024 within the Council of Europe on the evaluation of the results of judicial reform in the Western Balkans (Dashboard Western Balkans).

Representatives of the Agency also participated in three plenary sessions of GRECO, as part of the delegation of the Republic of Serbia. The first Compliance Report of the Republic of Serbia within the Fifth Evaluation Round of the Group of States Against Corruption of the Council of Europe (GRECO), which refers to the prevention of corruption and the improvement of integrity in the central bodies of state administration - the top executive functions and in agencies responsible for law enforcement, was adopted at the 97th plenary session of the Group of States Against Corruption of the Council of Europe (GRECO) held from June 17 to 21, 2024 in Strasbourg. Within its competences, the Agency was committed to fulfilling the recommendations of the Group of States against Corruption of the Council of Europe (GRECO), and to that end, the Agency also submitted initiatives to amend the Law on Prevention of Corruption and the Law on Lobbying to the Ministry of Justice as the authorized proposer of the law. It is expected that the amendments will be adopted, which will fulfill a significant part of the recommendations within the Fifth Round of Evaluation. The Agency has prepared a report on the activities it undertook within its competences in order to fulfill the recommendations and submitted it to the Ministry of Justice for further jurisdiction. The Republic of Serbia submitted the Second Compliance Report on December 31, 2025, which provided information on the steps and activities undertaken by the Republic of Serbia since the adoption of the first evaluation report until today, which is expected to be considered at the plenary session in June 2026.

In order to prepare for the Sixth Round of GRECO evaluation, the documents whose subject is "Preventing corruption and promoting integrity at the local, regional, decentralized level" which was

launched in 2025 are discussed. The representative of the Agency was selected as an evaluator in the 6th round of evaluation and attended trainings in order to prepare.

In 2025, representatives of the Agency participated in 22 international conferences and meetings. The most significant participation of the Agency's representatives in international conferences and meetings refers to those organized by the UN Office on Drugs and Crime (UNODC), the Secretariat of the Organization for Security and Cooperation in Europe (OSCE), the Office for Democratic Institutions and Human Rights (OSCE/ODIHR), the Council of Europe, the Regional Anti-Corruption Initiative (RAI), the Organization for Economic Cooperation and Development (OECD), as well as bilateral partners.

In 2025, the Agency also participated in two plenary sessions of the Network of Institutions for the Prevention of Corruption (NCPA), which gathers 35 members, five partner institutions and two observers, chaired by Morocco in 2025.

After becoming a member of the European Network of Institutions with a Register of Lobbyists (ELRN) in 2021, the Agency last year participated in the annual conference of this initiative, which was held in Ljubljana in May 2025.

When it comes to reporting on the implementation of the UN Convention against Corruption (UNCAC), comments and additions 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 review of compliance with the Convention. The Executive Summary for the Republic of Serbia was adopted at the Conference of the Signatory States in Doha on December 18, 2025. The Director of the Agency participated in the UNODC/UNCAC 11th Conference of States Parties to the UN Convention against Corruption, which was held from December 15 to 19, 2025 in Doha, Qatar.



The participation of representatives of the Agency at the 16th session of the Intergovernmental Working Group for the Prevention of Corruption within the framework of the United Nations Convention against Corruption (UNCAC) was noted, as well as the joint meeting with the Working Group for the Implementation of the United Nations Convention against Corruption, which were held in Vienna from June 17 to 20, 2025, as well as at the workshop "Implementation of UNCAC in Southeast Europe" which was held from April 8 to 10 in Vrdnik organized by the UN Office for Drugs and Crime, the Regional Anti-Corruption Initiative and the UNCAC coalition.

The Agency participated in filling out the "Strategies" and "Responsibilities" questionnaires, within the Public Integrity Indicators (PII) initiative of the Organization for Economic Cooperation and Development (OECD), which was presented at a workshop on July 9, 2025. The Agency also participated in filling out the questionnaire "Integrity of judges and disciplinary systems" in connection with the verification of assets and income and conflicts of interest and cumulation of functions of judges and public prosecutors, as well as "Efficiency of internal control and risk management".

The Director of the Agency, which is the National Coordinator for the Republic of Serbia, participated in the OECD ACN Plenary Meeting that was held from July 7 to 9, 2025 in Paris, including the 24th Oversight Meeting of the Istanbul Action Plan and the 30th Meeting of the Management Board of the ACN Network. The Government of the Republic of Serbia made a decision on the accession of the Republic of Serbia to the Istanbul Action Plan for the fight against corruption within the Network for the fight against corruption of the countries of Eastern Europe and Central Asia OECD. The Agency is the activity holder and coordinator in the Istanbul Action Plan, and has started the preparation of all necessary activities and documents in the evaluation of anti-corruption measures and reforms.

Cooperation within the framework of the European Partners Against Corruption (EPAC) and the European Anti-Corruption Contact Points Network (EACN) continued. Agency representatives participated online in the 24th Annual Professional Conference and General Assembly of EPAC/EACN, which was held in The Hague on November 24 and 25, 2025.

The Director of the Agency participated in the forum "According to the EU: Improving the integrity and independence of criminal justice in the countries of the Western Balkans" which was held in Ljubljana on March 10 and 11, 2025, as well as at the World Bank conference "Global Anti-Corruption Partnership Forum" held at the World Bank headquarters in Washington on April 8 and 9, 2025.

Representatives of the Agency (Director and Secretary of the Agency) participated in the regional workshop "Prevention of Corruption: Regional Approaches to Corruption and Challenges" which was held in Petrovac, Montenegro, on October 28 and 29, 2025, with the support of the UN Office on Drugs and Crime, and a representative of the Agency attended the regional forum "From Policy to Impact: Improving Integrity and Institutional Reform in the Western Balkans" which was held on December 9 and 10 2025 in Skopje, North Macedonia.

The participation of Agency representatives at expert meetings on measuring the effectiveness of anti-corruption agencies at the International Anti-Corruption Academy (IACA) in May and August 2025, as well as at the Regional Workshop dedicated to integrity in the public sector organized by the Regional School of Public Administration (ReSPA), where a regional comparative analysis of integrity in the public sector in the countries of the Western Balkans was presented, was noted.

Representatives of the Agency participated in a regional workshop on the topic of the Law on Public Procurement "Workshop on integrity and anti-corruption" organized by the Austrian Embassy. On that occasion, the Director of the Agency met with the Ambassador of the Republic of Austria in Serbia, Mr. E. Mr. Christian Ebner, and the adviser for the rule of law at the embassy, Mr. Georg Stav, at which gratitude was expressed to the Austrian embassy for its continuous support to the Agency and for joint efforts in the field of corruption prevention.

In addition to improving existing cooperation with numerous institutions for preventing and fighting corruption on a bilateral level, the Agency established communication and cooperation with new anti-corruption institutions in 2025.

A meeting was held with the representatives of the United Arab Emirates Accountability Control Agency on November 13, 2025, the aim of which was to exchange experiences and good practices in the field of corruption prevention, as well as to strengthen international cooperation, and the property declaration system and ways of connecting with the conflict of interest system, integrity plans and obligations of public institutions to prepare periodic plans for monitoring risks and developing preventive measures against corruption, as well as the use of digitalization / artificial intelligence in the detection of suspicious public contracts and public procurements were presented at the meeting.

Representatives of the Agency for the Prevention of Corruption of Montenegro were on a study visit to the Agency on December 11 and 12, 2025, and the topics discussed were campaigns to raise awareness about corruption, PR activities and cooperation with the media, anti-corruption education, resolving conflicts of interest, cumulation of functions and transfer of management rights.

Also, the Director of the Agency held an online meeting with Mr. E. Aybek Shakhavidinov, ambassador of the Republic of Uzbekistan to the Republic of Hungary, who is also the appointed ambassador to the Republic of Serbia, on March 13, 2025, where they discussed future cooperation in the field of corruption prevention. After that, at the initiative of the ambassador, an online meeting of the Agency's Director with the Director of the Agency for the Fight against Corruption of the Republic of Uzbekistan Dr. Akmal Burkhanov and his associates was held. The aim of the meeting is to establish closer cooperation between the two anti-corruption institutions, the competences of the institutions were presented, and the preparation of a memorandum that would be signed was also discussed.

Representatives of the Agency also participated in numerous meetings with the OSCE/ODIHR, the Venice Commission and international civil society organizations in connection with the implementation of election laws and the control of the financing of political activities during the election campaign.

INTERNATIONAL PROJECTS

Thanks to the donor support of the international community in the implementation of various projects and initiatives, then in the strengthening of the implementation of entrusted competences, as well as in the domain of developing the skills of employees, the professional and technical capacities of the Agency have been greatly improved.

As part of the Project "Support for strengthening the rule of law in the Republic of Serbia (EU for the fight against corruption and fundamental rights)", which is implemented by a consortium composed of the German Organization for International Cooperation (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 continued. Training for employees of the Agency on the topic "Conflict of interest and best practices" was carried out, organized by the International Anti-Corruption Academy, with the support of the EU, the German Federal Ministry and the Austrian Development Agency. Also, as part of the project, a training tailored to the Agency's employees and a study visit to the International Anti-Corruption Academy and anti-corruption institutions in Vienna, held in the period from February 17 to 22, 2025, during which Agency representatives visited related institutions in the Republic of Austria (Internal Audit and Compliance Group of the City-Province of Vienna, Anti-Corruption Agency of the Republic of Austria – BAK, Public Prosecutor's Office for Economic Crime and Corruption), as well as the Office of the United Nation on drugs and crime – UNODC.

As part of the project, two expert missions of representatives of the Special Investigation Service of Lithuania were held as part of a study visit to the Agency in the period from February 10 to 14, 2025, on the topic of implementing campaign activities to raise awareness among young people and raising awareness in local self-government units, and from June 18 to 20, 2025, on the topic of Lithuania's experience in educating young people, as well as the presentation of Lithuanian experience to the members of the Working Group for the preparation of the Manual for raising anti-corruption awareness in educational institutions.

With the support of the project "EU for the rule of law – Technical support for the implementation of action plans for chapters 23 and 24." implemented by the UN Office for Project Services (UNOPS), a platform is supported for the preparation of distance learning training in the field of ethics and integrity in education, integrity plans, lobbying, risk assessment of corruption in legislation, conflicts of interest, registries and assets. The trainings are available to users from December 2025, which enables the Agency to ensure the accessibility of the trainings to as many participants as possible, regardless of location.

As part of the Council of Europe's new project "Suppression of economic crime in Serbia", which is being implemented with the support of the Swedish International Development Cooperation Agency, a round table was held on May 22 and 23, 2025, as part of the activity "Development of methodology indicators for the control of financing of political entities", after which the consultants prepared the technical document "Strengthening control over the financing of political parties: Indicators for the detection of illegal financing". Also, a round table was held in regarding the improvement

of the methodology for assessing the risk of corruption in legislation, on March 18, 2025, and the technical document "Methodology for assessing the risk of corruption in the

application of the law" was prepared, and representatives of the Agency participated in the workshop "Legal framework for the protection of whistleblowers in Serbia" on October 16 and 17, where the material prepared by the consultants was discussed.

Representatives of the Agency participated in the meetings of the Working Group for the development of the Operational Plan for the Prevention of Corruption in the Police. With engaged experts, measures, activities, indicators of fulfillment in the Operational Plan related to the implementation of anti-corruption measures at the police level were formulated.

The OSCE Mission in Serbia provided significant support to the Agency by supporting the organization of an international conference on the occasion of December 9, the International Anti-Corruption Day, support in holding six workshops in Šabac and Kraljevo, with the aim of improving the content of the draft integrity plan for the fourth cycle during March and May 2025. Workshops were held with four working groups consisting of representatives of the state administration and local self-government systems, the health system, the social policy system and the public enterprise system. The recognized risk processes and their content will be an integral part of the draft (model) integrity plans that these systems will use in the fourth cycle of its creation and implementation. Also, a model catalog of public functions was created with consulting support, the development of which will continue in the next year. A round table was held with civil society organizations "Strengthening integrity and prevention of corruption – the strength of the local community" on October 3, in the premises of the OSCE Mission in Serbia, where they discussed the implemented projects and the strengthening of integrity at the local level. The work of the Working Group for the preparation of the Manual for teachers "Developing anti-corruption awareness among primary and secondary school students" was also supported, which was also presented at the conference marking the International Anti-Corruption Day.

The Agency participated in the 2024/2025 professional practice program for young people from southern and southwestern Serbia, which was implemented in cooperation with the OSCE Mission in Serbia and the Ministry of Human and Minority Rights and Social Dialogue, and enables young people to gain experience in the work of state administration for 12 months, and thus contribute to the development of their communities. It is intended for interns who have recently graduated and who live in the municipalities of Bujanovac, Medveđa, Novi Pazar, Nova Varoš, Preševo, Priboj, Prijepolje and Raška. Cycle for 2024/2025 was implemented with the support of the Government of the Kingdom of Norway, the Republic of Turkey, the Federal Republic of Germany and the Republic of Ireland. The program is being implemented for the sixth 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. As part of the program, the brochure "Assessment of the risk of corruption in legislation" was prepared and presented at the round table entitled "The importance of assessment of the risk of corruption in legislation and lobbying in the Republic of Serbia", on June 9, 2025. In December 2025, a meeting was held with seven interns included in the Program for 2025/2026. The meeting

was held in an interactive format, through discussions, analysis of case studies and a short quiz to check the knowledge gained by attending the "Ethics and Integrity" training on the distance learning platform of the Agency.

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

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



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

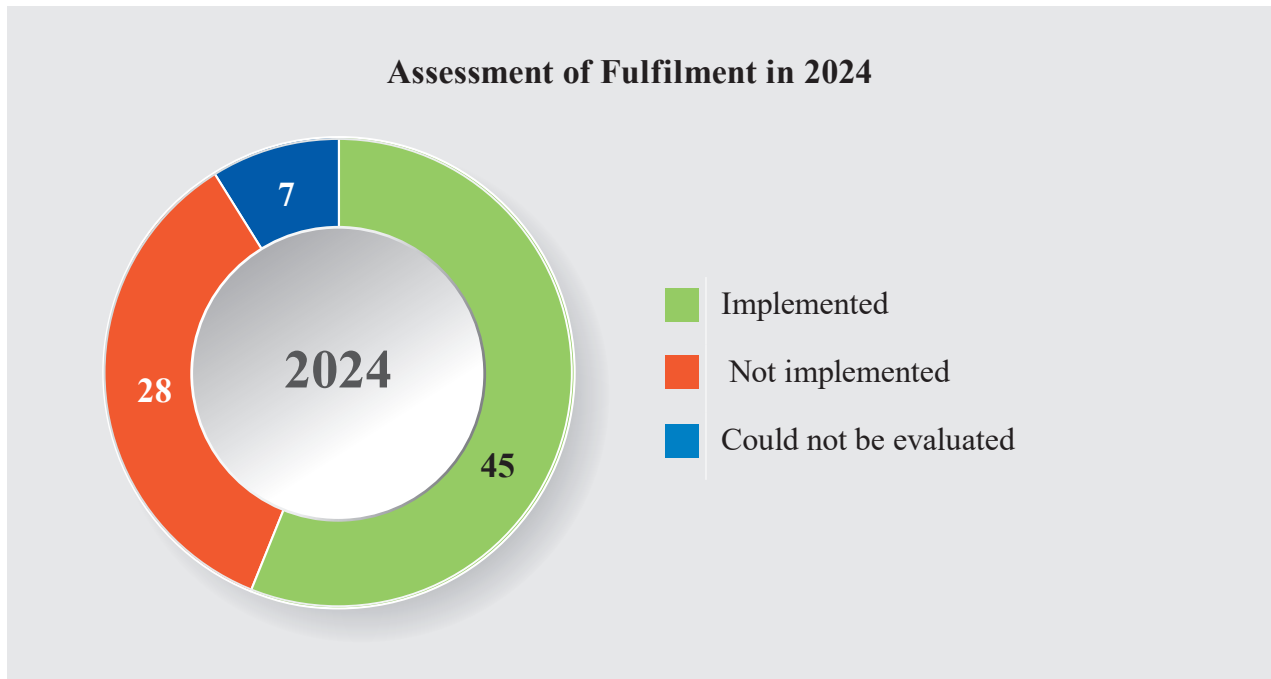
The Law on Prevention of Corruption stipulates that the Agency for the Prevention of Corruption supervises the implementation of strategic documents – strategies and action plans in the field of combating and preventing corruption. Consequently, the Agency is in charge of supervising the implementation of the Strategy and the Action Plan. The Agency prepares a report on the implementation of strategic documents which it submits to the National Assembly by the end of March of the current year, covering the previous year. The law stipulates that the method of reporting is regulated by a general act issued by the Director of the Agency. Based on that, the Director issued the Instruction on the manner of reporting on the implementation of strategic documents and the Guidelines for reporting on the implementation and oversight of the implementation of the Strategy and the Action Plan. These documents represent the legal framework that regulates the reporting process of subjects responsible for the implementation of strategic documents in the field of the fight against corruption.

Supervision over the implementation of strategic documents in the field of fighting corruption, as one of the Agency's important responsibilities, but also as an important segment of the strategic planning process, enables a comprehensive assessment of the relevance, efficiency and achievement of planned anti-corruption goals, measures and activities. At the same time, oversight provides a reliable basis for further improvement of public policies and the preparation of better quality strategic documents.

The fifth implementation report for 2024 was prepared by the Agency as part of the supervision over the implementation of the Revised Action Plan for Chapter 23 – Subchapter Fight against corruption and submitted to the National Assembly on March 21, 2025. In this context, the Agency observed, analyzed and evaluated 80 activities, that is, those activities that are continuous, those that are due in 2025, those that were evaluated as not implemented in the First, Second, Third, and Fourth Implementation Reports, as well as those that the Agency could not evaluate. According to the Agency's assessment, out of 80 examined activities, 45 were implemented, 28 were not implemented and 7 could not be evaluated.

In the process of its own strategic planning, the Agency relies on priorities in the field of European integration. During 2025, it developed the Operational Plan for the implementation of the Strategic Plan of the Agency for the period 2023–2027. It systematically monitored its implementation on a semi-annual basis, as well as through the Annual Report on the implementation of the operational plan. Apart from the Agency's key competences, the Operational Plan also covered the area of gender equality.

National Anti-Corruption Strategy for the period 2024–2028 (hereinafter: Strategy) was adopted at the session of the Government of the Republic of Serbia on July 25, 2024. The main reason for the adoption of this document is the determination: "to build a democratic society based on the principles



of the rule of law, transparency and responsibility, in which the system of integrity prevents corruption". The Strategy also stated that: "the fight against corruption is one of the key strategic priorities of the Republic of Serbia, as well as part of the European integration process", and therefore one of the expected effects of the implementation of this document would be a contribution to "the fulfillment of the 14 transitional criteria for Chapter 23: Judiciary and fundamental rights, which refer to the Sub-chapter: Fight against corruption, and especially the transitional criteria related to the harmonization of the normative framework in accordance with GRECO (Council of Europe Group of States against Corruption) recommendations". The strategy contains general, five special goals and 30 measures, the implementation of which should contribute to the achievement of special goals.

Action plan for the period 2024–2025. year for the implementation of the Strategy (hereinafter referred to as the Action Plan) was adopted at the session of the Government of the Republic of Serbia on December 26, 2024⁴. The action plan also contains 143 activities, of which 14 are due for implementation in the fourth quarter of 2024, 2 in the first quarter of 2025, 14 in the second quarter of 2025, 8 in the third quarter of 2025, 104 in the 4th quarter of 2025, while the implementation of one activity is related to the election period during the validity of the Action Plan. The total estimated budget for implementing activities from the Action Plan amounts to 403,907,667⁵ RSD. From that number, the total estimated financial assets for 2024 amount to RSD 21,174,000, while the estimated assets for 2025 amount to RSD 382,733,667.

In 2025, the Agency prepared four periodic reports, for the IV quarter of 2024 and the I, II and III quarters of 2025.

⁴ Available at: <https://www.srbija.gov.rs/dokument/45678/strategije-programi-planovi-php>

⁵ In the Action Plan, it is stated that the total estimated funds are RSD 406,787,666 (page 80). However, when the individual items related to the estimated funds for the implementation of activities are added, their total sum is RSD 403,907,667 RSD.

In addition to the quarterly reports, a Report on the implementation of the National Strategy for the Fight against Corruption and the Action Plan for its implementation was prepared, which includes the entire period of validity of the Action Plan from the 4th quarter of 2024 to the end of 2025. This report contains an analysis of the achievement of special goals, as well as the status of the implementation of all measures and activities from the Action Plan.

Regarding the status of achievement of special goals, the data are as follows: out of five special goals, two (40%) could not be evaluated due to a change in the measurement methodology and the unavailability of data for evaluation, while three special goals were not achieved (60%).

When it comes to the implementation of measures, out of a total of 30 measures, 4 (13%) were implemented, while 26 (87%) were not implemented.

Out of a total of 143 activities, 61 (43%) were implemented, while 80 (56%) were not implemented, and two activities (1%) could not be evaluated.

The Agency participated in the working group and focus group meetings for the drafting of the Action Plan for 2026–2028. during August and September, and then in the framework of the public hearing. Although it was not a member of the working group, the Agency actively participated in the drafting of the Action Plan, proposing activities, deadlines and budget funds for the implementation of which it was designated as the responsible entity. On the other hand, the Agency expressed its suggestions and proposals through opinions on the Action Plan drafts and on other elements of these documents.

CORRUPTION RESEARCH AND ANALYTICS

Research and analytics in the field of corruption prevention include the collection, processing and interpretation of various data in order to understand the scope, form and perception of corruption, as well as to identify its causes and risk factors. In this way, it is possible to detect the inefficiency of existing systems, provide support for institutional decision-making based on data, establish an empirical basis for further analyses and recommendations, and develop strategies for the prevention and suppression of corruption, thus contributing to the strengthening of the preventive approach to the fight against corruption. The analytical part related to the analysis and recording of decisions on appointments and dismissals of public officials is significant due to the monitoring of changes in public functions and the timely harmonization of data in the registers, which is the basis for the implementation of preventive measures and the exercise of control competences of the Agency.

We highlight the key results from the past year:

The analysis and consolidation of statistical data from the Agency's field of work was carried out, in accordance with the criteria of the Methodology for evaluating the effects of the Law on Prevention of Corruption, which provided the basis for a systematic assessment of the effects of the Law while identifying key areas for improvement.

A continuous record has been established of decisions made on the appointment and dismissal of public officials, with approximately 8,500 decisions entered, which represents a significant basis for checking data and harmonizing with the Register of Public Officials.

In the reporting period, the analysis and consolidation of statistical data from almost all areas of work of the Agency⁶ was carried out in accordance with the criteria from the Methodology for evaluating the effects of the Law on Prevention of Corruption. In order to improve the completeness and reliability of information, activities were undertaken that included updating the methodological matrix (an instrument for monitoring and evaluating the effects of the implementation of the Law), coordinating the collection, as well as detailed processing and analysis of statistical data. The systematization of data referred to activities from 2024, which were entered into a unique electronic table, functionally adapted for simple data entry, connection and automatic data processing. This approach provides an integrated and standardized presentation of data, which is the basis for a systematic assessment of the effects of the Law, identifying key areas for improvement and making informed, operationally relevant decisions.

A continuous record has been established on the adopted decisions on the appointments and dismissals of public officials.

⁶ Reports on assets and income, conflict of interest management, integrity plans, "Ethics and Integrity" trainings, oversight of the implementation of strategic documents, handling of complaints, as well as giving opinions in the process of assessing the risk of corruption in legislation.

To that end, the contents of the edition of the Official Gazette of the Republic of Serbia, which have been published since June 2023, were systematically monitored and processed, with an emphasis on decisions on the appointment and dismissal of public officials that are important for the work of the Agency. Based on the analysis of the content of the Official Gazette of the Republic of Serbia edition, an up-to-date record was established, which is continuously supplemented and into which slightly more than 8,500 decisions have been entered. This activity enables precise monitoring of changes in the status of public officials and timely harmonization of data, which is an important prerequisite for the effective implementation of the Agency's preventive competences.

In order to prepare for the implementation of activities from the Action Plan for the implementation of the National Strategy for the Fight against Corruption, which refers to the preparation of the Analysis of existing systems for reporting irregularities in public enterprises (activity 1.3.6), additional questions were prepared for the content of the draft integrity plan, in the part related to mechanisms for reporting irregularities in public enterprises. The issues mentioned will be included in the draft integrity plan within the fourth cycle. The questions are aligned and systematized into separate units, namely: questions for complainants, questions for whistleblowers and questions for employees. After the institutions within the system of public companies prepare their integrity plans in the fourth cycle, the analysis of relevant data will be started, in order to fully implement the mentioned activity 1.3.6.

In order to improve the contents of the draft integrity plan, the Agency carried out the procedure of verification of integrity plans in the judicial system and the local self-government system, through the analysis of experiences and attitudes of users of court services, i.e. users of services of local self-government units. The research was conducted as part of an internal analytical process, for the purpose of expert verification and improvement of the content of the draft integrity plan.

Sessions of the National Assembly of the Republic of Serbia and competent parliamentary committees were continuously monitored, with a special focus on issues and discussions of importance to the Agency's competences. Based on the analysis of the discussions and conclusions from the sessions, where the Agency was the subject of discussion or was mentioned, reports were prepared for timely information and improvement of the efficiency of the Agency's work.

THE COUNCIL OF THE AGENCY

During 2025, the Council held 11 regular and four telephone sessions. Within its jurisdiction, as a second instance body, it decided on 29 appeals and on one request for annulment of the final decision *ex officio*. Of the mentioned number, 26 appeals and requests were rejected as unfounded, while in two cases the first-instance decisions were annulled. In one case, in the procedure of reconsidering the appeal, after the judgment of the Administrative Court, the Chamber made a decision on the costs of the procedure.

When it comes to annulled first-instance decisions, they refer to procedures in which the Board,⁷ or the Chamber, already decided on appeals from 2019 and 2021. Then it rejected the appeals as unfounded, and public officials initiated administrative disputes against these decisions. The Administrative Court accepted the lawsuits of public officials in judgments adopted in 2025, annulled the decisions of the Board/Council and sent the proceedings back for retrial on appeal. In the renewed proceedings, the Chamber in both cases, considering that the statute of limitations had expired, *ex officio* annulled the first-instance decisions and suspended the proceedings⁸.

In accordance with the mandated authority to monitor the financial situation of the Agency's Director, the Chamber conducted the procedure of controlling his financial situation.

Acting on the request of the Administrative Court, the Council submitted a response to six lawsuits that were filed for the annulment of decisions, and 36 administrative disputes are pending based on lawsuits from previous years. In the course of 2025, the Administrative Court delivered nine judgments. Seven lawsuits were rejected, and two lawsuits were upheld and the cases were sent back for retrial.

Members of the Council, between sessions, analyzed cases in which the rapporteurs and the employees of the Secretariat of the Council worked on the drafting of decisions. In the context of complex legal issues, they studied the legislation that regulate a certain disputed legal issue, in order to take principled legal positions.

⁷ Until the start of the implementation of the Law on Prevention of Corruption on September 1, 2020, appeals filed against the decisions of the Director of the Anti-Corruption Agency were resolved by the Board as a second instance body of the Agency.

⁸ The provision of Article 77, paragraph 2 of the same law stipulates that the procedure, in which a decision is made on the existence of a violation of this law, is conducted in case of suspicion of the existence of a conflict of interest (Articles 40-44), existence of incompatibility (Articles 45-55), accumulation of public functions (Article 56), acceptance of gifts (Articles 57-66) and declaration of assets and income (Articles 67-76). According to paragraph 3 of the same article of this law, the procedure from paragraph 2 it can be initiated within two years from the day of learning about the existence of a violation of this law, and it cannot be initiated or terminated if five years have passed since the action or inaction of the public official that caused the violation of this law.

The Council's supervisory role was realized by reviewing written monthly reports, as well as verbal reporting by the Director on the work of the Agency.

Appeals Council decisions – total	Number
Appeals Rejected	26 (14 m / 12 f)
Annulment of First Instance Decision	2 (1 m / 1 f)
Denied request to set aside the final decision	1 (f)
Decision on the appeal on the costs of the procedure	1 (m)
Total	30 (16 m / 14 f)

Appeals Council decisions – property control	Number
Appeals Rejected	1 (f)
Total	1 (f)

Appeals Council decisions – conflict of interest	Number
Appeals Rejected	25 (14 m / 11 f)
Annulment of First Instance Decision	2 (1 m / 1 f)
Denied request to set aside the final decision	1 (f)
Decision on the appeal on the costs of the procedure	1 (m)
Total	29 (16 m / 13 f)

PROCEEDINGS OF THE ADMINISTRATIVE COURT ON COMPLAINTS AGAINST THE DECISIONS OF THE BOARD / COUNCIL

Judgments of the Administrative Court delivered in 2025	Number
Dismissed lawsuit	7 (6 m / 1 f)
Accepted lawsuit	2 (1 m / 1 f)
Total	9 (7 m / 2 f)

REGIONAL UNITS NOVI SAD, KRAGUJEVAC, NIŠ

The goal of the work of the Regional Units is the effective implementation of anti-corruption legislation at the local and regional level, strengthening the integrity of public officials and institutions, as well as raising public awareness of the importance of corruption prevention. They act as organizational parts of the Agency, providing operational and advisory support to the implementation of legal responsibilities, thereby contributing to strengthening integrity and transparency at the local level.

During the first year since its foundation, the Regional Units achieved continuous cooperation with local self-government bodies, public institutions and companies, and public officials in the territory of the units' jurisdiction. Special emphasis in the work of the units was placed on the establishment of precise internal records of public functions, as well as public authorities, through monitoring the appointment and dismissal of public officials in municipalities and cities.

In the course of 2025, the Novi Sad Regional Unit implemented the following activities:

- processing of cases related to the matter of financing political activities, specifically the drafting of proposals for the initiation of misdemeanor proceedings against responsible persons in political entities in connection with the failure to submit annual financial reports. The cases covered political entities that have their registered seat on the territory of AP Vojvodina;
- provision of advisory opinions to public officials and public authorities based in the territory of the province;
- participation in preventive and educational activities carried out by the Agency for the Prevention of Corruption in the reporting period;
- with the professional service of the Faculty of Law of the University of Novi Sad, through specific support based on the signed Cooperation Agreement;
- with professional associations such as the Chamber of Commerce of Vojvodina, with whose leadership a meeting was held and further steps in establishing institutional cooperation were agreed upon.

Regional units in Kragujevac and Niš, apart from consultative meetings within the framework of regular communication with public officials who contact for consultation regarding the declaration of assets and income, the possible existence of a conflict of interest, declaration of gifts and others, made a large number of direct contacts with citizens who expressed interest in the procedure of submitting complaints. In both regional units, the recording of public functions was intensively carried out in order to create a Catalog of public offices. Regional units made proposals for new work goals and indicators of work success according to the new Rulebook on internal organization and systematization of workplaces in the Agency's Service.

The Regional Unit in Kragujevac, in cooperation with the Protocol Service of the City of Kragujevac and the Department for Integrity and Anti-Corruption Education of the Agency, in the City Assembly of Kragujevac, implemented the eleventh training "Leader as a driver of building institutional integrity", with the aim of presenting to the heads of institutions the importance of developing and implementing integrity plans as an institutional mechanism for the prevention of corruption.

The regional unit in Niš has changed its location, so that since October it is located at a new address, in the building of the City Administration of the City of Niš in Nikola Pašić street number 24.



COOPERATION WITH STATE BODIES AND CIVIL SOCIETY ORGANIZATIONS (CSOs)

The cooperation of state authorities plays a significant role in the work of the Agency, as well as in the prevention and fight against corruption. Institutions act each within their competences, and in order for the effects and results to be complete and far-reaching, mutual coordination and support is necessary. The exchange of knowledge, experiences and good practices is a pillar of building effective partnerships. Accordingly, in 2025, the Agency concluded two Cooperation Agreements and one Protocol Annex on cooperation with public authorities.

The Annex to the Protocol on cooperation with the Office for Information Technologies and Electronic Government was concluded, which, among other things, foresees the cooperation of the two institutions in the field of using the Unified Communication Network of electronic administration and the joint development of the ICT structure and electronic administration.



Agreement on cooperation between the Agency and the University of Criminal Investigation and Police Studies, signed on December 9, 2025, as part of the International Conference organized on the occasion of the International Anti-Corruption Day, activities were defined that will develop and improve the cooperation of these two institutions in the coming period. The agreement envisages the exchange of expert information and experience in the field of corruption prevention, participation

of the Agency employees in teaching activities at the University, engagement of University teachers and associates in Agency trainings, as well as through support for undergraduate and master's students in the form of professional practice and mentoring.



**КАНЦЕЛАРИЈА ЗА
ЈАВНЕ НАБАВКЕ**

The signed Cooperation Agreement with the Public Procurement Office (KJN) continues further work on improving cooperation in areas of common interest for the Agency and the KJN, with a special focus on the exchange of data relevant to the performance of work under the jurisdiction of both institutions provided by law.

COOPERATION WITH CIVIL SOCIETY ORGANIZATIONS (CSOs)

As mediators between citizens and public authorities, Civil Society Organizations (CSOs) have a certain role in the context of preventing corruption. They do this through education and research on corruption, monitoring the work of authorities and their representatives, raising public awareness of the harmfulness of corruption, advocating the introduction of new anti-corruption policies, informing citizens, etc. Due to their importance for the preservation of social integrity, these organizations are a natural collaborator of the Agency.

During 2025, the implementation of four anti-corruption education projects for young people was completed, which were financially supported in the amount of 5,864,400 RSD.

Cooperation with civil society organizations in the field of fighting corruption in the reporting period was realized through monitoring and support of projects financed on the basis of the public tender from 2024, as well as through other forms of cooperation and dialogue with the civil sector. In the first half of the year, four projects were implemented whose focus was on educating young people about corruption: "The fight against corruption in the focus of young people" (Užice Center for Human Rights and Democracy), "Less corruption – a richer society" (Podrinje Anti-Corruption Team – PAKT), "Program for acquiring and improving the competences of socially responsible young people – Clean up corruption" (Bečej Youth Association) and "Preventing corruption through the empowerment and networking of young people at the regional level" (Education Center and the development of MAGENTA). All projects were completed by June 30, 2025, after which the

Agency prepared final reports on the implementation of projects for all associations that participated in the competition.

During the realization of projects, regular control of monthly narrative and quarterly financial reports was carried out, along with continuous communication with civil society organizations and provision of logistical and advisory support. Three monitoring visits to ongoing projects were carried out, after which reports with recommendations were drawn up.

In addition to project monitoring, the Agency participated in other forms of cooperation with the civil sector during the year, including participation in a seminar within the project "Less corruption – a richer society", which was implemented by the Bečej Youth Association with partner organizations.

In October 2025, in cooperation with the OSCE Mission in Serbia, a round table entitled "Strengthening integrity and prevention of corruption – the strength of the local community" was held. The event was attended by civil society organizations that received funds for the implementation of projects in the previous year, as well as other organizations that deal with corruption prevention issues. Special attention was paid to the Sixth Round of the GRECO evaluation, with a focus on preventing corruption and strengthening integrity at the local and regional level, as well as the role of the civil sector in the evaluation process of the Republic of Serbia.

RISING PUBLIC ANTI-CORRUPTION AWARENESS



CELEBRATING 15 YEARS OF THE AGENCY AND THE INTERNATIONAL ANTI-CORRUPTION DAY

On the occasion of the International Anti-Corruption Day and marking 15 years since the establishment of the Agency, in cooperation with the OSCE Mission in Serbia, an international conference entitled "15 Years of Development of Anti-corruption Mechanisms Based on International Institutional Cooperation" was organized, which brought together the highest representatives of all three branches of government of the Republic of Serbia, the diplomatic corps, international and regional organizations, independent institutions, the academic community, civil society and the media.

The guests present were greeted by Dejan Damjanović, the Director of the Agency, and then, in the introductory part, Prof. Dr. Đuro Macut, President of the Government of the Republic of Serbia,

prof. Dejan Vuk Stanković PhD, Minister of Education, Nenad Vujić, Minister of Justice, Marcel Peško, ambassador, head of the OSCE Mission in Serbia, Plamena Halačeva, deputy ambassador of the EU Delegation in Serbia, Matilde Mordt, permanent coordinator of the UN in Serbia and Maria Tripodi, undersecretary of the Ministry of Foreign Affairs and International Cooperation of the Republic of Italy.



Within the thematic panel "Key Advances in the Development of Anti-corruption Mechanisms" the results of the Agency's work in the previous 15 years were presented, as well as the "Developing Anti-corruption Awareness among Primary and Secondary School Students", prepared on the basis of the Cooperation Agreement with the Ministry of Education, the Institute for the Improvement of Education and the Institute for Education Quality and Evaluation.



The second panel was dedicated to the theme "International Partners, Common Goals: Anti-corruption Cooperation" and within it, guests from the region, embassies and international organizations addressed the audience with their presentations: Montenegro, the Republic of North Macedonia, the Republic of Austria, the Republic of Italy and the UN Office on Drugs and Crime.



The conclusions of the conference, presented by Director Damjanović, related to cooperation with institutions of higher education, the implementation of the Cooperation Agreement signed with the Ministry of Education and two professional institutes, work on the new Unified Information System of KAS, the creation of the Catalog of Public Functions, amendments to the Law on Prevention of Corruption, the Law on Financing Political Activities and the Law on Lobbying, strengthening of the Agency's regional units (Novi Sad, Niš, Kragujevac), work on the formation of the Agency's educational teams and the creation of a network of *Trainers for trainings*, as well as raising the process of developing and implementing integrity plans.

AGENCY EVENTS

EXPERT GATHERING "IMPORTANCE OF CORRUPTION RISK ASSESSMENT IN LEGISLATION AND LOBBYING IN THE REPUBLIC OF SERBIA"

On June 9, 2025, with the support of the OSCE Mission to Serbia, the Agency organized an expert meeting and a round table entitled: "The Importance of Corruption Risk Assessment in Legislation and Lobbying in the Republic of Serbia". The goal of the meeting was to improve transparency and efficiency in the adoption of legislation, as well as to improve legislation related to lobbying. An important part of the expert meeting was the presentation of the contents of the "Brochure on risk assessment of corruption in legislation" as a publication produced by the Agency, which aims to provide a simplified presentation of the corresponding obligations of public authorities prescribed by the LPC, as well as a concise presentation of the Agency's competence in the domain of risk assessment of corruption in legislation. The second thematic area of the expert meeting was dedicated to the obligations of lobbied persons and public authorities in accordance with the Law on Lobbying, bearing in mind that public officials and employees of state administration bodies may be lobbied persons during the preparation of the draft law.



TRAINING FOR MEMBERS OF THE GOVERNMENT OF THE REPUBLIC OF SERBIA

The Agency, with the support of the General Secretariat of the Government of the RS, implemented two trainings for members of the Government entitled "Integrity Standards of Public Officials through the Legal and Institutional Framework for Prevention of Corruption".

By conducting these trainings, the Agency fully realized the activities within its competence related to the fulfillment of the recommendations from the 5th evaluation round of the Group of States for the Fight against Corruption (GRECO), which are intended to strengthen the knowledge and awareness of integrity standards among the persons on the top public offices within the executive branch.

Topics related to the implementation of the Law on Prevention of Corruption and the Law on Lobbying were presented at the trainings. Specifically, the presentations were related to the obligations of public officials in the areas of ethics and integrity, prevention of conflicts of interest (incompatibility and accumulation of public functions, performance of other jobs or activities, etc.), reporting of property and income of public officials, notification of entry and termination of public office, submission of records of gifts, lobbying, as well as assessment of the risk of corruption in legislation.

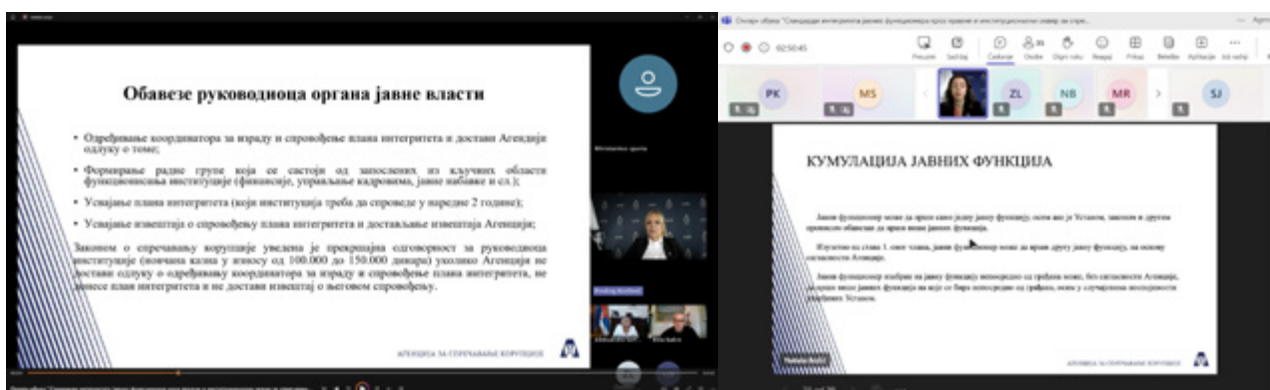


АГЕНЦИЈА ЗА СПРЕЧАВАЊЕ КОРУПЦИЈЕ

Стандарди интегритета јавних функционера
кроз правни и институционални оквир за
спречавање корупције

у складу са препоруком из Евалуационог
извештаја Групе држава за борбу против
корупције (GRECO)

27. мај 2025. године



WORK MEETINGS

As part of regular activities, Director Dejan Damnjanović hosted numerous domestic and foreign officials at work meetings at the Agency who expressed interest in working and cooperating with the Agency. The visits of the Prime Minister of the Republic of Serbia, PhD Prof. Đuro Macut, meetings with the ministers of justice, state administration and local self-government, education, culture, then the president of the Chamber of Commerce of Vojvodina, as well as the Directors of other state bodies and institutions – the Office for Public Procurement and the Office for the Audit of the EU Funds Management System. Also, representatives of the International Monetary Fund, acting head of the OSCE Mission in Serbia, Carolina Hidea, the delegation of the Italian Ministry of Foreign Affairs and International Cooperation led by Mr. min. Rafaele Langjell, as well as representatives of the Special Investigation Service of Lithuania.



MEDIA ACTIVITIES

Posts on Facebook and Instagram

During 2025, 105 posts were published on the Agency's social networks and the Director's business profile.

Journalists' questions

53 journalists' questions were answered, which related to the Agency's actions in the areas of application and verification of the Report on assets and income of public officials, procedures in the area of conflicts of interest and accumulation of functions, as well as financing of political activities.

Press releases on the Agency's website

69 press releases about the work of the Agency have been posted on the Agency's official website.

PR texts in print media

5 PR texts were published.



Guest appearances on television

The Director of the Agency appeared as a guest on five television shows to mark International Anti-Corruption Day and the 15th anniversary of the Agency.



In order to provide timely information in the reporting period, a comprehensive, analyzed and regularly updated review of relevant media content related to the Agency's competences was provided. Activities included monitoring of online media, as well as other relevant sources, selection of content relevant to the work of the Agency and preparation of structured reviews of media publications. In 2025, the review of media events covered almost 2,500 relevant news, whereby the Agency was mentioned 120 times.

PUBLICATIONS

MANUAL FOR TEACHERS – DEVELOPING ANTI-CORRUPTION AWARENESS AMONG PRIMARY AND SECONDARY SCHOOL STUDENTS

Realizing the obligations assumed by the signed Cooperation Agreement of the Agency with the Ministry of Education of the Government of the Republic of Serbia, the Institute for the Improvement of Education and the Institute for Education Quality and Evaluation, a working group composed of representatives of these institutions was formed in 2025 to prepare a Manual for raising anti-corruption awareness in educational institutions.

In order to familiarize members of the working group with the concepts of corruption, ethics, integrity and conflict of interest, a training session was held, which was the basis for further work on the development of the manual. After several meetings and harmonization of views and ideas, in October 2025, the writing of the publication *Manual for teachers – Developing anti-corruption awareness among primary and secondary school students* was completed. The manual was printed with the support of the OSCE Mission in Serbia and was presented for the first time at the Agency's conference, held on the occasion of the International Anti-Corruption Day, on December 9, 2025. The handbook is available on the Agency's website at the link https://www.acas.rs/storage/page_files/Priru%C4%8Dnik%20za%20nastavnike%20-%20razvijanje%20antikorupcijske%20svesti%20kod%20u%C4%8Dnika%20osnovne%20i%20srednje%20skole.pdf



CORRUPTION RISK ASSESSMENT IN LEGISLATION

In cooperation with the OSCE Mission in Serbia, the brochure "Assessment of the Risk of Corruption in Legislation" was published, which was created as part of the project implemented during the Professional Internship Program for young people from South and South-West Serbia for 2024/2025.

NORMATIVE POLICY: Within its jurisdiction, the Agency has the authority to enact general acts regulating certain issues within its scope, such as the declaration of assets and income of public officials, lobbying, registers and records it maintains, the Agency reporting, integrity plan, training organized and implemented and other internal normative acts. During 2025, the Agency adopted a total of six general acts.



SUMMARY ON THE WORK OF THE AGENCY

The majority of the content of the Summary on the work of the Agency, which was updated during the year, related to the changes regarding the adoption of the new Rulebook on the internal organization and systematization of workplaces in the Agency, as well as the updating of documents from the field of finance.

Also, in 2025, the Agency acted on 203 requests for free access to information of public importance.



PARLIAMENTARY QUESTIONS

The Agency dealt with five parliamentary questions in accordance with Article 287 of the Rules of Procedure of the National Assembly. Parliamentary questions related to the actions of the Agency in connection with the obligation to declare the assets and income of public officials, as well as questions in the field of risk assessment of corruption in legislation.

STRENGTHENING THE CAPACITY OF THE AGENCY

PERSONNEL CAPACITIES

As of December 31, 2025, a total of 98 persons are employed in the Professional Service of the Agency for an indefinite period of time, out of a total of 162 provided by the Rulebook on internal organization and systematization of workplaces, which represents 60.50% of the occupation of workplaces. Of the mentioned number, 65 women (66.3%) and 33 men (33.7%) are employed in the Agency. Regarding the age structure, the Agency has two employees aged 21–30 (2 women), 15 employees aged 31–40 (7 women and 8 men), 41 employees aged 41–50 (29 women and 12 men), 34 employees aged 51–60 (23 women and 11 men) and six employees aged 61–70 (four women and two men).

The strategic and operational planning of human resources and the forecasting of future requirements in the area of knowledge and skills of employees, which arise from the competence of the Agency, had their practical implementation through the realization of trainings for all employees in accordance with the Program of professional development and additional education for the year 2025, namely through 40 trainings organized by the National Academy for Public Administration and 18 trainings organized by domestic and international partners. The total number of employees in the Agency who have undergone training is 188, while the total number of employees who have undergone training in connection with the implementation of the laws under which the Agency acts in the reporting period is 89, with the note that the same employees participated in certain trainings, depending on the topic and organizational unit of the Agency, to which the topic refers.

Some of the workshops, round tables, conferences and other trainings in which the employees of the Agency participated were:

- Participation in the training Management of conflicts of interest and best comparative practices in Belgrade, organized by the International Anti-Corruption Academy;
- Study visit to anti-corruption institutions in Vienna and training tailored to the Agency's employees in order to strengthen the Agency's capacity in the organization of the International Anti-Corruption Academy;
- Participation in a meeting with international experts, as well as participation in the training "Presentation of the Methodology for assessing the risk of corruption in the application of legislation", within the project "Prevention of economic crime in the Republic of Serbia", organized by the Council of Europe;
- Participation in the training "Preventing corruption and promoting integrity at the local and regional level" held in Strasbourg, organized by GREKO and the Council of Europe;
- Participation in the training "Implementation of UNCAC in Southeast Europe" in Vrdnik organized by UNODC;

- Participation in the event "According to the EU: Improving the integrity and independence of criminal justice in the countries of the Western Balkans", which was held in Ljubljana;
- Participation in the World Bank conference "Global Anti-Corruption Partnership Forum", which was held at the World Bank headquarters in Washington;
- Participation in the UNODC/UNCAC 11th Conference of States Parties to the UN Convention against Corruption, which was held in Doha, Qatar;
- Participation in two IACA - Expert meetings on measuring the effectiveness of anti-corruption agencies, which were held in Luxembourg;
- Participation of representatives of the Agency at the sixteenth session of the open-type Intergovernmental Working Group for the Prevention of Corruption, which was held in Vienna;
- Participation of representatives of the Agency in the workshop (exchange of experiences) of RESPA within the project "Strengthening of capacities in the field of ethics and integrity in the public sector in the countries of the Western Balkans";
- Participation of representatives of the Agency in the regional workshop "Prevention of corruption: Regional approaches to corruption and challenges" which was held in Petrovac, Montenegro;
- Participation of Agency representatives at the OECD ACN Plenary Meeting, held in Paris, which included the 24th Monitoring Meeting of the Istanbul Action Plan and the 30th Meeting of the ACN Management Board;
- Participation in the workshop "Mapping the risk of corruption: new solutions and possibilities of their application" in Strasbourg, organized by the Council of Europe;
- Participation in the Annual Conference of the ERLN 2025 Lobbyist Network, organized by The European Lobbying Registrars Network and the Slovenian Corruption Prevention Commission;
- Participation in the workshop "Preventing the inflow of illegal funds in the financing of political activities", within the project "Prevention of economic crime in the Republic of Serbia", organized by the Council of Europe;
- Participation in training dedicated to public procurement viewed through the prism of preventing corruption and strengthening integrity in public procurement procedures in Belgrade, organized by the Austrian Embassy;
- Participation in the training on risk assessment of corruption in legislation as a mechanism of corruption prevention organized by the National Academy for Public Administration;
- Participation in the online training "Lobbying in Serbia" organized by the National Academy for Public Administration;
- Participation in the round table in Belgrade "Legal framework for the protection of whistleblowers in the Republic of Serbia" organized by the Council of Europe, within the project "Prevention of economic crime in the Republic of Serbia";
- Participation in training dedicated to public procurement with a special focus on the work of the Public Procurement Portal and the use of data through the aforementioned portal, organized by the Office for Public Procurement;
- Participation in the regional workshop dedicated to the Law on Public Procurement "Workshop on integrity and anti-corruption" organized by the Austrian embassy;
- Participation in the Regional Conference in Skopje dedicated to the improvement of integrity and institutional reforms in the Western Balkans, organized by UNOPS;
- Participation of representatives of the Agency in the instructional training "My role in the reform agenda of the Republic of Serbia".

IT CAPACITIES

In the past five years, the Agency has completely renovated its information system and established a modern, stable and secure IT framework that can be quickly adapted to all business requirements. The rapid development of information technologies, the growing amount of data and increasingly complex threats to information security make the year 2025 extremely challenging in the field of IT support and infrastructure.

Unified information system

Activities on the restoration of the Unified Information System (JIS), which began at the end of 2024, continued during 2025. For the needs of the project, two SharePoint sites were developed for collaboration, storage and exchange of documentation between internal and external teams.

During the year, all three phases foreseen by the contract on the creation of JIS (II, III and IV) were successfully implemented. All functionalities defined by the project documentation were delivered, supporting documents and a test version of the system were created, which created the conditions for entering the final phase of the project in the following year.

IT infrastructure

- Replacement of the telephony system

A complete replacement of the telephony system was carried out. An old telephone switchboard with five outdated servers was virtualized with minimal investment, which achieved significant savings in electricity consumption, hardware maintenance costs and licenses. At the same time, greater reliability, the possibility of creating backup copies and greater user mobility are ensured.

- Replacement of the cooling system of the *Data Center*

The old InRow units were replaced with new devices that, in addition to more efficient cooling, also ensure optimal air humidity control in the Data Center. This significantly contributes to the reliability and longevity of the equipment located in the Data Center. Funds for this investment are provided from the current budget reserve.

IT security

Information security was one of the Agency's key priorities in 2025. The dynamism and complexity of threats continue to grow, and cyber attacks on government agencies are becoming more frequent, sophisticated and targeted. In such an environment, the Agency continued to develop a security system based on the principles of prevention, early detection, rapid response and continuous improvement.

The following activities were carried out during the year:

- **Proactive action and continuous risk monitoring**
The agency daily monitored relevant sources of information on security incidents, vulnerabilities and trends in cyberspace, including recommendations from national and international bodies. Based on this, security policies and procedures are regularly updated.
- **Introduction of new and improvement of existing protection tools**
The strengthening of the protection system continued with the application of modern solutions for the detection and prevention of attacks, access control, monitoring of activities in the network and protection of end devices. Special emphasis is placed on tools for early detection of anomalies and potentially malicious activities.
- **Regular checking and testing of security measures**
Periodic configuration checks, resilience tests, and vulnerability analyzes are conducted to ensure that all measures are operating in accordance with best practices and legislation. Observed deficiencies were eliminated without delay.
- **Strengthening the awareness and competence of employees**
Employees are regularly informed about current risks and recommendations for the safe use of IT resources, which significantly contributed to reducing the possibility of incidents caused by the human factor.

Despite a large number of cyber attacks on state bodies during the year, the Agency, thanks to the application of all available protection measures, preserved the continuity of work without interruption and without loss of data. All services remained available, which confirms the maturity and reliability of the established IT security system.

FINANCIAL AND TECHNICAL CAPACITIES

All public procurement procedures were carried out in a timely manner and the necessary procurement contracts were concluded. Contracts have been executed or are being executed in accordance with the agreed dynamics.

1. Funding of the Agency's activities

The total budget of the Agency in 2025 was 429,932,000 RSD, of which 391,932,000 RSD were for regular activities, i.e. 38,000,000 RSD for the project of creating a unique information system of the Agency.

Planned funds for salaries, benefits and social benefits for employees amounted to **298,725,000 RSD**, which represents **69.48%** of the total amount.

In the previous year, the Agency's budget also had a development component, given that the project "Creation of a unified information system for the needs of the Agency" was financed with **38,000,000 RSD**, i.e. **64.96%** of the total value of the Project (the Project is planned for the period 2024-2026, while the total value is 58,500,000 RSD).

The total execution of the budget was **422,917,151 RSD**, which is **98.37%** of the approved funds in 2025.

PLANNED FUNDS

Attachment 1: Program structure of the Agency's budget for 2025

No.	Program activity	Project	Budget	Source of fi-nancing
1.	Implementation of corruption prevention mechanisms		391,932,000	01 – budget funds
2		Creation of a unified in-formation system	38,000,000	01 – budget funds
		Total:	429,932,000	

EXECUTION OF THE BUDGET FOR 2025

The total execution of the Agency's budget in 2025 was 422,917,151 RSD, which is 98.37% 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	255,720,000	255,005,466	714,534	99.72
412	Salaries, allowances and employee benefits	38,575,000	38,416,157	158,843	99.57
413	Social contributions borne by the employer	1,100,000	929,082	170,918	84.46
414	Benefits in kind	2,350,000	2,225,943	124,057	94.72
415	Social benefits to employees	3,007,000	2,865,240	141,760	95.28
416	Employee expenses compensation (transportation to work)	2,080,000	2,010,475	69,525	96.66
421	Employee benefits and other special expenses	8,000,000	7,592,398	407,602	94.90
422	Fixed costs	1,300,000	990,211	309,789	76.17
423	Travel expenses	53,500,000	52,400,980	1,099,020	97.94
424	Contractual services	400,000	322,569	77,431	80.64
425	Specialized services	4,540,000	3,208,878	1,331,122	70.68
426	Current repairs and maintenance	3,000,000	2,715,777	284,223	90.53
482	Materials	150,000	20,868	129,132	13.91
483	Taxes, mandatory fees and penalties	100,000	0,00	100,000	0.00
485	Fine and court-ordered penalties	700,000	474,690	225,310	67.81
512	Compensation for injuries or damage caused by state authorities	16,760,000	15,104,114	1,655,886	90.12
515	Machinery and equipment	650,000	635,904	14,096	97.83
Total:		Intangible assets	384,918,751	7,013,249	98.21

Project 1: 5001 – Creation of a unified information system

Economic classification	Budget item	Planned	Executed	Residual	% of execution
423	Contractual services	38,000,000	37,998,400	1,600	99.99
	Total:	38,000,000	37,998,400	1,600	99.99

AMOUNTS OF FINES IMPOSED AND COLLECTED IN MINOR PROCEEDINGS AND AMOUNTS FOR ATTENDING TRAINING FOR LOBBYISTS FOR THE BENEFIT OF THE RS BUDGET

According to the requests of the Agency for the initiation of misdemeanor proceedings, the Misdemeanor Court in Belgrade imposed a total of 10,955,000.00 RSD, and a total of 4,366,800.00 RSD was collected, while the Misdemeanor Appellate Court imposed 14,670,000.00 RSD, and a total of 6,827,806.00 RSD was collected.

During 2025, 231,320 dinars were charged to the Budget of the Republic of Serbia for attending training and issuing a certificate of completed training for a lobbyist.

2. Improvement of working conditions and safety at work for employees

- The fire alarm system in the Agency building was improved.
- Amended internal acts in the field of safety and health at work, in accordance with the Law on Safety and Health at Work. Realized training in the field of safety and health at work for all employees and engaged persons in the Agency.
- Inspection of electrical installations carried out.
- Part of obsolete equipment replaced.
- Improved video surveillance system in the Agency building in Belgrade, by installing new cameras and integrating them into the existing system.

3. Logistics

4. As part of the "Energy efficiency in central government buildings" program, the Agency secured the status of the beneficiary, i.e. the energy reconstruction of the building in Carice Milice street no. 1, the headquarters of the Agency in Belgrade. The participants of the Program are the Ministry of Mining and Energy (the Program holder), the Directorate for Joint Affairs of the Republic's Bodies (the Program participant) and UNDP (the Program implementer). Reconstruction of the building will include: installation of thermal insulation on part of the facade; partial replacement of roof insulation; replacement of the existing cooling unit; placing films with solar protection on glass surfaces; replacement of existing lighting with LED lighting.

By applying the mentioned measures, it is expected that the consumption of final energy will be reduced by more than 20%..

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 refer to gender statistics and provides an overview of the most important data classified by gender.



Sector for the Control of Political Activities	Total	Women	Men
Number of submitted annual reports on the financing of political entities	150	36	114
The number of verified (formal correctness control) annual reports on the financing of political entities	148	36	112
Number of content controls of annual reports on the financing of political entities	36	9	27
Number of content controls of final reports on election campaign expenses	40	21	19
The number of submitted requests for the initiation of misdemeanor proceedings against the political entity and the responsible person in the political entity due to violation of the LFPA, in connection with the submission of the annual financing report, namely:	83	12	71
Due to non-submission of the annual financing report	79	10	69
Due to non-use of 5% of funds from public sources for professional development and work with membership	2	1	1
Due to failure to submit the opinion of the authorized auditor	1	0	1
Other violations	1	1	0
The number of submitted requests to initiate 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 reports on election campaign expenses, namely:	61	11	50
Due to non-delivery of preliminary reports on the costs of the election campaign	10	0	10
Due to failure to submit final reports on election campaign expenses	26	3	23

Due to the submission of incomplete final reports on the expenses of the election campaign	13	3	10
Due to the use of public resources contrary to the Law, during the election campaign	2	1	1
Other violations of the Law	10	4	6
The number of submitted requests for the initiation of misdemeanor proceedings against a legal entity, an entrepreneur, a responsible person in a legal entity and a natural person for violation of the LFPA	6	2	4
Failure to provide data at the Agency's request	1	1	0
Other violations of the Law	5	1	4
The number of participants in training for political entities in the reporting period	42	15	27
Sector for Legal and Human Resources Affairs	Total	Women	Men
The number of submitted requests to initiate misdemeanor proceedings against public officials due to violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME	118	39	79
The number of submitted requests to initiate misdemeanor proceedings against judges for violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME	6	6	0
The number of submitted requests for the initiation of misdemeanor proceedings, in the reporting period, against prosecutors for violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME	14	6	8
The number of submitted requests for initiation of misdemeanor proceedings, in the reporting period, against persons on the top executive functions due to violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME	15	7	8
The number of misdemeanor court decisions, delivered in the reporting period, based on requests to initiate misdemeanor proceedings against public officials due to violations of the Law on Prevention of Corruption related to Chapter VI GIFTS and Chapter VII REPORTING OF ASSETS AND INCOME namely:	146	56	90
Agreement on recognition of violations	3	1	2
Convictions (reprimands and fines in total)	141	55	86
Measures of reprimand	44	19	25
Fines	97	36	61
Acquittals	2	0	2

The number of decisions of the misdemeanor court, delivered in the reporting period, made on the basis of a request to initiate misdemeanor proceedings against judges for violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME namely:	2	2	0
Convictions (reprimands and fines in total)	2	2	0
Measures of reprimand	2	2	0
The number of misdemeanor court decisions, submitted in the reporting period, based on requests to initiate misdemeanor proceedings against prosecutors due to violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME namely	18	8	10
Convictions (reprimands and fines in total)	17	8	9
Measures of reprimand	12	5	7
Fines	5	3	2
Acquittals	1	0	1
The number of decisions of the misdemeanor court, delivered in the reporting period, based on requests to initiate misdemeanor proceedings against persons on the top executive positions due to violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII REPORTING OF ASSETS AND INCOME namely:	3	2	1
Agreement on recognition of violations	1	1	0
Convictions (reprimands and fines in total)	2	1	1
Fines	2	1	1
Number of submitted requests to initiate misdemeanor proceedings against public officials due to violations of the Law on Prevention of Corruption related to conflict of interest	10	6	4
The number of misdemeanor court decisions, submitted in the reporting period, made based on 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, as follows:	25	16	9
Agreement on recognition of violations	1	0	1
Convictions (reprimands and fines in total)	24	16	8
Measures of reprimand	9	6	3
Fines	15	10	5

The number of submitted requests for initiation of 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 the integrity plan.	3	1	2
The number of misdemeanor court decisions, submitted in the reporting period, made based on a request 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, namely:	3	0	3
Convictions (reprimands and fines in total)	3	0	3
Fines	3	0	3
The number of submitted requests for initiation of misdemeanor proceedings against a responsible person in a public authority for violations of the Law on Prevention of Corruption related to training in the field of prevention of corruption and strengthening of integrity	1	0	1
The number of misdemeanor court decisions, delivered in the reporting period, made based on a request to initiate misdemeanor proceedings 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, namely	5	2	3
Convictions (reprimands and fines in total)	4	1	3
Measures of reprimand	1	0	1
Fines	3	1	2
Acquittals	1	1	0
The number of submitted requests for initiation of misdemeanor proceedings, in the reporting period, against other persons due to failure to respond to the Agency's summons, failure to provide direct access to data and documents, and failure to submit documents and information within the prescribed period or after processing the complaint	1	1	0
The number of criminal complaints filed against public officials for failure to declare assets and income in order to conceal them in the reporting period	6	0	6
The number of criminal complaints filed against judges for not declaring assets and income in order to conceal them in the reporting period	1	0	1
The number of received decisions / notifications on the outcomes of the actions of the competent authorities on criminal complaints against public officials in the reporting period	2	1	1

Dismissed criminal complaints with the application of the principle of opportunity	2	1	1
Number of training participants in the reporting period	188	122	66
Number of participants in trainings organized by the Agency	14	10	4
Number of participants in trainings organized by international organizations	58	32	26
The number of participants in trainings organized by NAJU	55	41	14
Number of participants in trainings organized by other authorities and organizations	61	39	22
Sector for resolving conflicts of interest and controlling the transfer of management rights	Total	Women	Men
The number of requests received for performing another function, notifications about performing another job or activity (refers to membership in associations in this section and in all other sections that follow) and for establishing a working relationship or business cooperation after the termination of public office (pantoflage) in the reporting period	725	326	399
Number of requests to perform another function	265	117	148
Number of requests / notifications for performing other work	447	201	246
The number of requests for the establishment of an employment relationship or business cooperation after the termination of office (pantoflage)	13	8	5
The total number of resolved requests of public officials to perform another function, to perform another job or activity and to establish a working relationship or business cooperation after the termination of the public function in the reporting period	550	243	307
For another function	218	92	126
For performing another job or activity	317	144	173
A pantoflage	15	7	8
The number of decisions made, in the reporting period, rejecting the public official's request or informing the official that the simultaneous performance of public office and work endangers the impartial performance of the public office and obligates the official to stop performing that work.	49	12	37
For another function	28	11	17
For performing another job or activity	19	1	18
A pantoflage	2	0	2

The number of decisions made, in the reporting period, by which the request was rejected or 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).	165	62	103
For another function	55	19	36
For performing another job or activity	108	41	67
A pantouflage	2	2	0
The number of resolutions adopted, in the reporting period, approving the public official's request	496	229	267
For another function	195	83	112
For performing another job or activity	289	140	149
A pantouflage	12	6	6
The number of officials who acted according to the Agency's decisions rejecting the request for consent and stopped performing another incompatible office, performing another job or activity	34	6	28
The number of notifications received about suspected conflicts of interest of public officials in the reporting period	32	14	18
The number of given opinions (notifications) on suspected conflicts of interest of public officials in the reporting period	33	11	22
Number of notifications given , in the period for which is reported, by which the Agency established that the suspicion of a conflict of interest of a public official is justified and by which it is recommended that the public official refrain from acting or making decisions in a specific situation, i.e., another proposal was made to eliminate the conflict	20	8	12
Sector for assets and income control	Total	Women	Men
The number of lobbyists registered in the Register of Lobbyists	2	0	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 Chapter VI. GIFTS and head VII. REPORTING OF ASSETS AND INCOME AND THAT:	222	77	145
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	66	17	49
Due to the delay in submitting the report (notification of unchanged status) in assets and income after resuming public office	41	10	31
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	65	32	33

Due to non-reporting of important changes in assets and receipts during the exercise of public office	29	14	15
Due to several violations of the law related to the obligation to declare assets and income by the same public official	21	4	17
The number of reprimands issued to public officials in the reporting period due to violations of the Law on Prevention of Corruption related to chapter VI GIFTS and chapter VII. REPORTING OF ASSETS AND INCOME AND THAT:	211	73	138
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	55	14	41
Due to the delay in submitting the report (notification of unchanged status) in assets and income after resuming public office	45	11	34
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	59	29	30
Due to non-reporting of important changes in assets and receipts during the exercise of public office	30	15	15
Due to non-reporting of significant changes in assets and income after termination of public office	1	0	1
Due to several violations of the law related to the obligation to declare assets and income by the same public official	21	4	17
The number of pronounced measures of public announcement of the decision on violation of the law in the reporting period due to violations of the Law on Prevention of Corruption related to Chapter VII. REPORTING OF ASSETS AND INCOME	7	2	5
The number of reported appeals against the decisions of the Agency's first-instance body related to chapter VI GIFTS and chapter VII. REPORTING OF ASSETS AND INCOME	2	1	1
The number of proposals for the submission of a request for initiation of misdemeanor proceedings for violations of the Law on Prevention of Corruption related to Chapter VI GIFTS and Chapter VII REPORTING OF ASSETS AND INCOME in the period the reporting entity	181	64	117
The number of received decisions on the outcomes of misdemeanor courts' actions on requests to initiate misdemeanor proceedings against public officials in the reporting period (for requests submitted until November 2023)	4	2	2
Convictions (reprimands and fines in total)	4	2	2
Measures of reprimand	1	1	0
Fines	3	1	2

Number of proposals for filing criminal complaints against public officials for failure to declare assets and income in order to conceal them in the reporting period	5	0	5
The number of criminal reports/reports against public officials due to non-reporting or providing false data on assets and income for the purpose of concealing them in the reporting period or suspicion of committing another criminal offense for which they are being prosecuted ex officio	3	1	2
The number of received decisions / notifications on the outcomes of actions of competent authorities on criminal complaints / reports against public officials in the reporting period	22	8	14
Convicted conditional sentences	1	0	1
Acquittals / decisions	1	0	1
Dismissed criminal complaints with the application of the principle of opportunity	4	1	3
Indictment filed	2	2	0
Evidentiary actions in progress	9	3	6
Dismissed criminal complaints	5	2	3
Sector for integrity and anti-corruption education	Total	Women	Men
Number of participants who completed distance training on ethics and integrity during the reporting period	26167	17394	8773
Number of ToT participants in the reporting period	8	7	1
Number of participants who completed distance training on the impact of corruption on particularly vulnerable groups in the reporting period	17	8	9
Number of training participants in the field of integrity plans in the reporting period	82	59	23
Number of participants in trainings in the field of integrity plans organized by the Agency	82	59	23
Number of training participants for managers in the reporting period	61	33	28
Number of participants in trainings for managers organized by the Agency	61	33	28



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