



**АСК**

РЕПУБЛИКА СРБИЈА  
АГЕНЦИЈА ЗА  
СПРЕЧАВАЊЕ  
КОРУПЦИЈЕ

# WORK REPORT

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for 2023







Republic of Serbia



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АГЕНЦИЈА ЗА  
СПРЕЧАВАЊЕ  
КОРУПЦИЈЕ

# **WORK REPORT**

## **for 2023**

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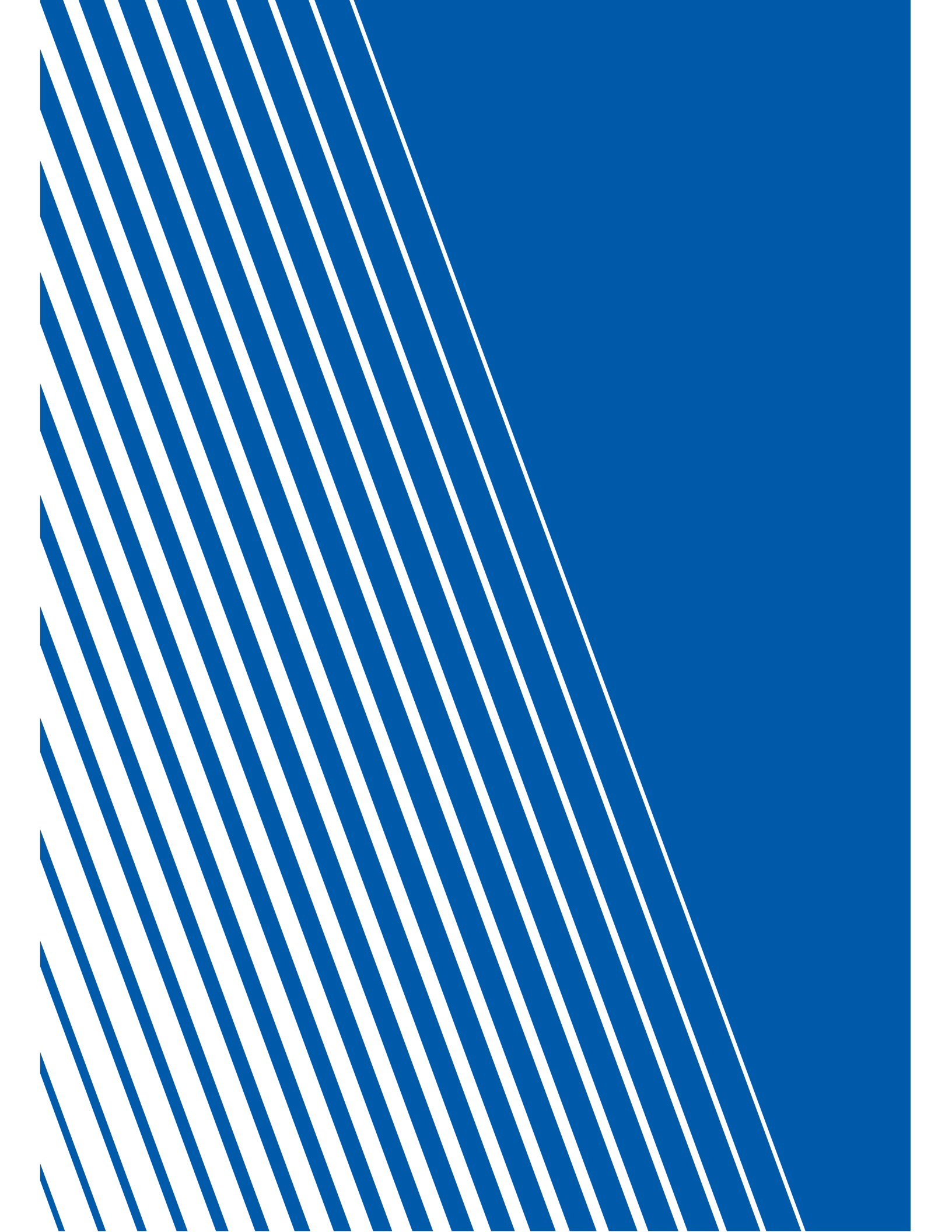
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# INTRODUCTORY REMARKS

„Corruption is the worst form of violence against people and society.”

*Mahatma Gandhi*

In light of the increasing challenges posed by corruption in the circumstances of significant social developments in the country and the world, and in accordance with the Law on Prevention of Corruption, which obliges the Agency to submit an annual work report to the National Assembly of the Republic of Serbia, we present the activities and achievements in 2023, the first in the mandate of the Agency's new leadership. We are convinced that this report will provide a clear insight into the efforts made and the results achieved, and at the very beginning, we would like to thank all collaborators who contributed and supported the realization of the set goals.

Essentially, the report represents an objective assessment of to what extent and in what way the Agency fulfilled the foreseen strategic goals and undertook appropriate measures within its competences in the previous year.

We consider the implementation of the Agency's competence as a type of moral imperative in efforts to make a healthy society the foundation of the overall stability of the country. We understand corruption prevention not only as our job but also as a social mission and responsibility. We improve our fourteen-year experience every day in direct communication with a wide circle of collaborators, both from domestic institutions and public authorities, as well as with representatives of international organizations in Serbia. We advocate that through positive legal instruments, we stigmatize corruption to the greatest extent possible, and that we act preventively through trainings and lectures so that the ultimate outcome is that the public official is a professional with full personal and business integrity.


We are of the opinion that the prevention of corruption begins at the earliest age of an individual's life. In other words, it is a problem of the educational system, at least as much as of the Agency in its institutional framework. As such, we recognized the importance of introducing this topic at all levels of education for young people in our country.

The Agency made its contribution to strengthening cooperation with relevant international participants through the exchange of information, experiences, and best practices. The results of the work were regularly reported to the European Commission, the Council of Europe, and the United Nations, and we especially emphasize the work on fulfilling the recommendations of GRECO in order to successfully complete the Fifth Evaluation Round.

Guided by the idea that transparency and principles are key in the fight against corruption, we hope that this report will serve as a useful tool in our joint fight for a just and prosperous society. This is precisely why we do everything to make the results of our work and the meaning of our struggle more visible in the public eye.

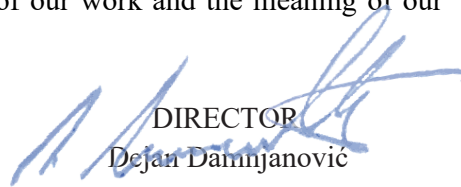
PRESIDENT OF THE COUNCIL

Steve Bajic



DIRECTOR

Dejan Damjanović



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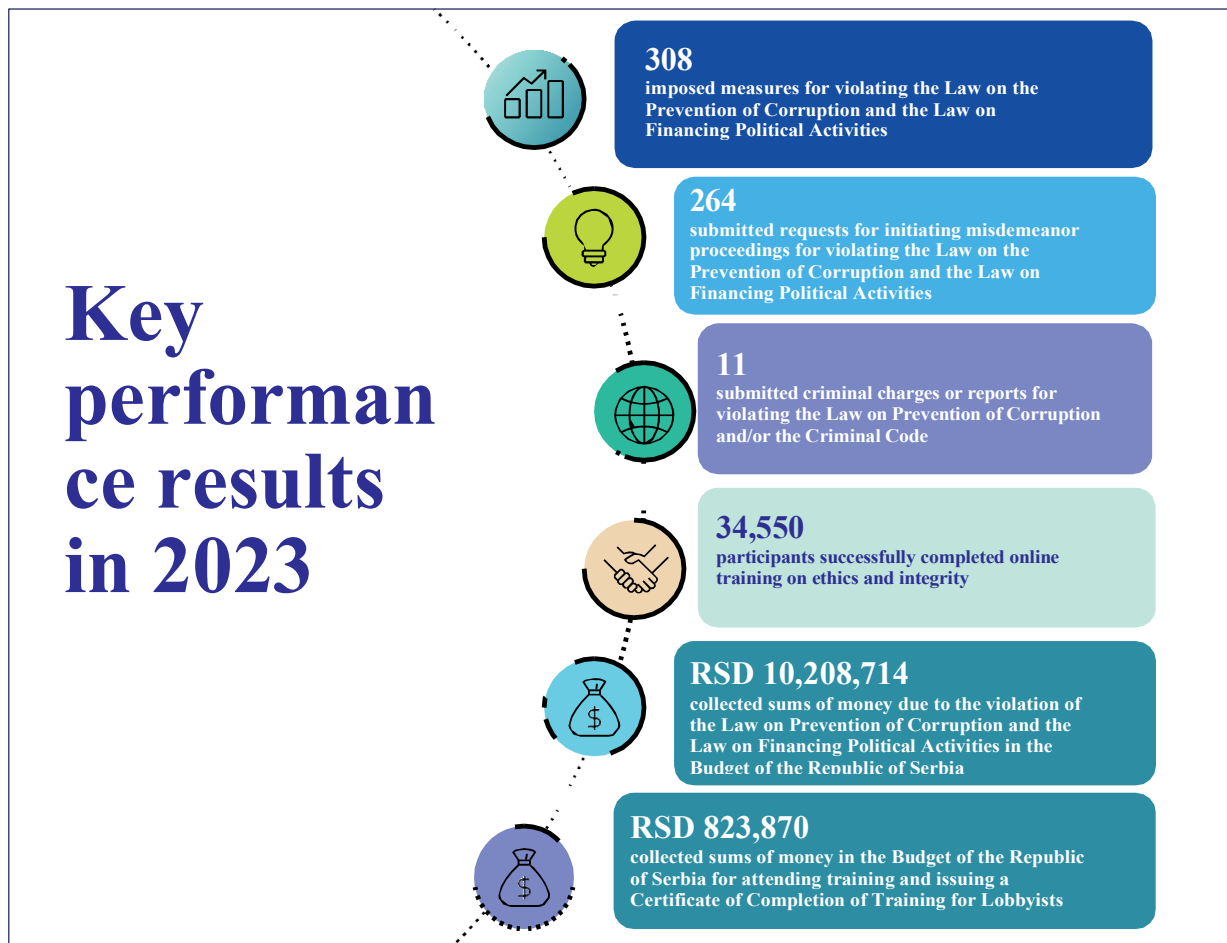
# BRIEF OVERVIEW

During 2023, the Agency for Prevention of Corruption of the Republic of Serbia (hereinafter: the Agency), as an independent state institution with numerous preventive, control, and supervisory powers, completed the following:

- Due to violations of the Law on Prevention of Corruption, in connection with the resolution of conflicts of interest, the Agency issued 91 reprimands, seven measures of public announcement of the decision on the violation of the Law, and five measures of public announcement of the recommendation for dismissal from public office. In addition, the Agency has issued four decisions on termination of public office by force of law.
- During the election campaign, after the scheduled local elections (for councilors of city assemblies and municipal assemblies in the Republic of Serbia) and parliamentary elections (for the election of MPs), as well as the elections for deputies of the Assembly of the Autonomous Province of Vojvodina scheduled for December 17, 2023, the Agency received 28 charges against public officials due to suspected violations of the provisions of Article 50 of the Law on Prevention of Corruption. In 10 cases, the Agency determined violations of the Law on Prevention of Corruption and issued reprimands.
- In the very field of registration, as well as verification of reports on assets and income, the Agency issued 178 reprimands, as well as eight measures of public disclosure of the decision on the violation of the Law on Prevention of Corruption.
- The Agency submitted 9 criminal charges and 2 reports to the competent prosecutor's offices due to the existence of reasonable doubt that public official, in order to conceal assets and income, did not declare assets and income to the Agency or provided false information on assets and income.
- The Agency issued 11 reprimands, submitted 94 requests for initiating misdemeanor proceedings, and issued 62 decisions on loss of the right to receive funds from public sources intended for financing the regular work of a political entity in the next year were made on the basis of final judgments;
- The Agency published the Catalog of Gifts for 2022, which includes 431 protocol and occasional gifts that public officials received during 2022 from 35 bodies of all levels of public government, in connection with the performance of a public function.
- Based on the request of the authorized proposers of the law for giving opinions, the Agency drafted eight opinions on regulations from areas particularly risky for the emergence of corruption and regulations governing issues covered by confirmed international agreements in the field of prevention and fight against corruption.
- The Agency organized three trainings for lobbyists, after which 17 candidates obtained the Certificate of Completion of Training for Lobbyists.



- The Agency opened 38,061 user accounts for ethics and integrity trainees employed in 337 public authorities. Out of the stated number, 34,550 of them successfully completed the distance training by taking a knowledge test.
- As part of the monitoring of the implementation of the Revised Action Plan for Chapter 23 - Sub-Chapter: Fight against Corruption, the Agency prepared the Third Implementation Report for 2022, which was submitted to the National Assembly on March 27, 2023.
- Under the slogan "For Serbia without Corruption", with series of events in several cities in the Republic of Serbia, from December 9 to 16, 2023, the Agency organized the Anti-Corruption Week.
- The Agency cooperated intensively with the Prime Minister's Office and the Ministry of Justice, as well as other relevant institutions, in order to achieve compliance with the recommendations of the Group of States against Corruption of the Council of Europe (GRECO) and thereby contribute to the completion of the Fourth Round of Evaluation, which includes the prevention of corruption in relation to deputies, judges and prosecutors.





# RECOMMENDATIONS

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- It is necessary to carry out activities aimed at fulfilling the recommendations of the Group of States against Corruption (GRECO) in the Fifth Evaluation Round, including the adoption of the Law on Amendments to the Law on Prevention of Corruption and the Law on Amendments to the Law on Lobbying.
- It is necessary to adopt the Law on Amendments and Additions to the Law on the Financing of Political Activities in order to regulate the actions of third parties (legal and natural persons who are not contributors within the meaning of the Law) with the aim of influencing the election result or the activity of a political entity.
- In the strategic documents for prevention of corruption (the national anti-corruption strategy and the accompanying action plan, etc.), it is necessary to include an activity on the research of the requisites and capacities of units of local self-government in the prevention and fight against corruption, which precedes the activity of introducing an anti-corruption mechanisms in the local community - so that the mechanism itself has more potential for application.
- The competent ministry must regulate the field of professional training with general acts, including the section on ethics and integrity in public companies and other companies whose founder or member is the Republic of Serbia, an autonomous province, a local self-government unit, or a city municipality.
- Authorized proposers of laws should consistently and timely fulfill their obligation to submit draft laws to the Agency, which issues an opinion on the assessment of the risk of corruption in laws from areas particularly at risk for the emergence of corruption.

## THE AGENCY

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The Agency is an independent state body which reports to the National Assembly of the Republic of Serbia. Funds for the work of the Agency are provided in the budget of the Republic of Serbia, in a special budget section, and from other sources, in accordance with the law. The annual funds for the work of the Agency in 2023 provided in the budget amounted to RSD 331,749,000.

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

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

- Law on Prevention of Corruption ("Official Gazette of RS", no. 35/2019, 88/2019, 11/2021 - authentic interpretation, 94/2021 and 14/2022);
- Law on Financing of Political Activities ("Official Gazette of RS", no. 14/2022);
- Law on Lobbying ("Official Gazette of RS", no. 86/2018 and 86/2019);



- Law on Referendum and People's Initiative ("Official Gazette of RS", no. 111/2021 and 119/2021).

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

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

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

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

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

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

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

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

Competences of the Agency established by the Lobbying Act are:

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



# BODIES OF THE AGENCY

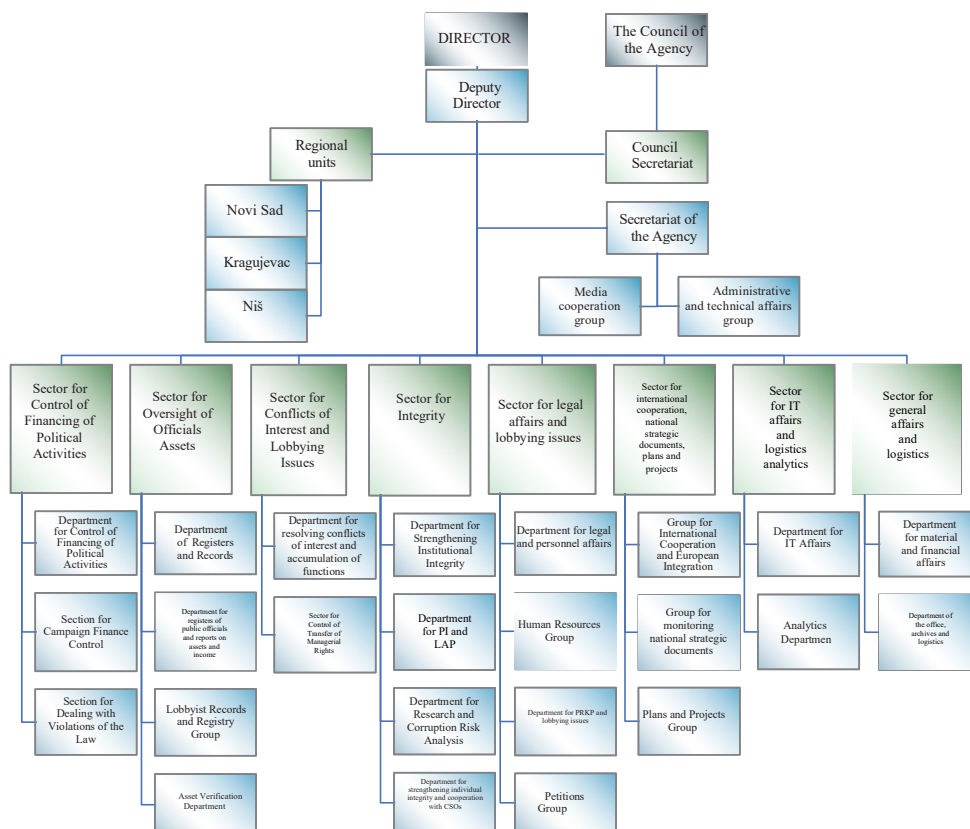
The bodies of the Agency are the Director and the Council of the Agency (hereinafter: the Council).

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

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

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

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



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

The members of the Council are:

- Stevo Bajić, President of the Council, employed by the Agency as a member of the Council;
- Danica Marinković, Deputy President of the Council, Judge of the Court of Appeal in Kragujevac, retired;
- Tamara Mišić, employed by the Agency as a member of the Council;
- Biljana Pavlović, Head of the Cabinet of the President of the Commission for Protection of Competition and Head of Protocol in the Commission for Protection of Competition; and
- Vesna Lazarević, Judge of the Administrative Court in Belgrade, retired (elected to the position of member of the Council by the decision of the National Assembly on October 26, 2023).

Until his resignation on May 30, 2023, the function of a member of the Council (as of March 22, 2023, and the function of President of the Council) was held by the prof. dr. Miloš Stanković, Associate professor at the Faculty of Law, University of Belgrade.

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

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







# OVERVIEW OF ACTIVITIES AND RESULTS

## CONFLICT OF INTEREST

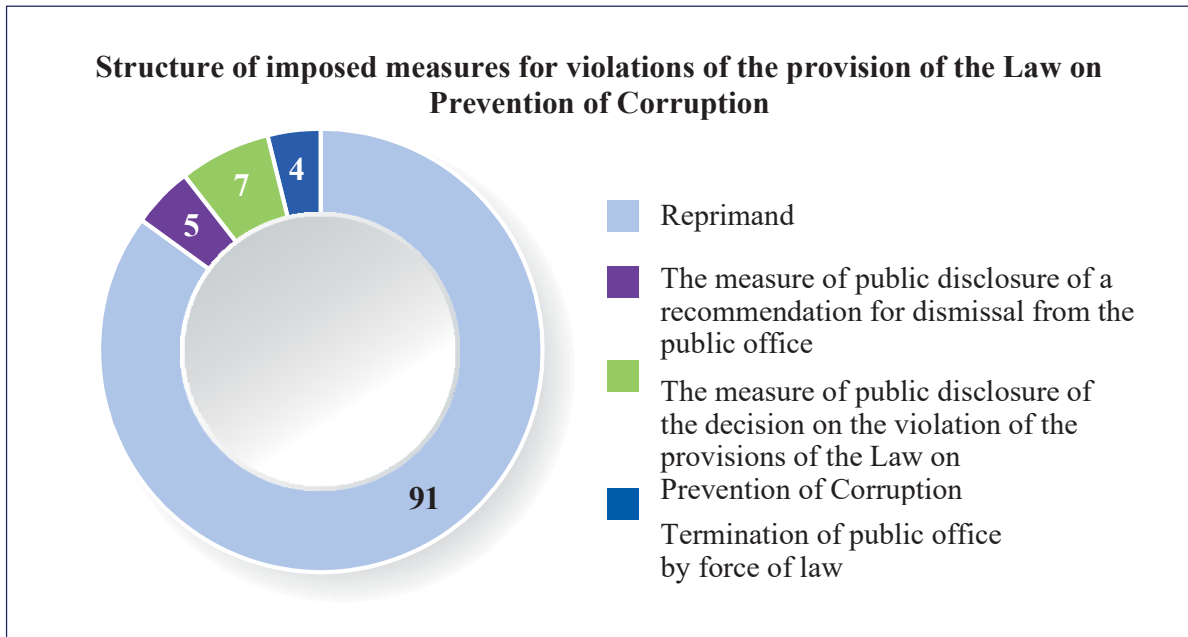
The Agency has the authority to prevent and resolve situations of conflict of interest in the performance of public functions. The purpose of preventing and resolving conflicts of interest and the unauthorized cumulating of public functions is to uphold integrity, minimize the risk of abuse, and establish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



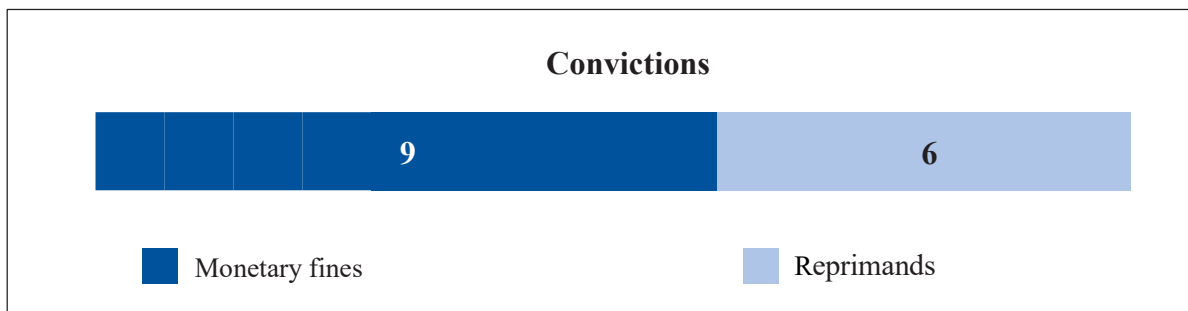
During the year 2023, 634 requests of public officials for giving consent for performing another public function, i.e., for performing another job or activity, for membership in the bodies of the association, for establishing an employment relationship or business cooperation after the termination of the public function - pantouflage – have been resolved in the following way:

- in 502 cases, the Agency has given its consent for the performance of another public office, that is, for the performance of another work or activity;
- 46 decisions were adopted rejecting the request of a public official for consent of the performance of another public function, that is, the performance of another work or activity;
- in 32 cases, the Agency informed the public official about the situation of conflict of interest;
- 54 procedures were completed in another way (by adopting a decision rejecting the request as untimely or non-qualifying, i.e. by adopting a decision on the suspension of the procedure, giving notice that the Agency is not competent and by means of an official note).

Determining the violation of the provisions of the Law on the Prevention of Corruption, the Agency imposed 103 measures and made four decisions on the termination of public office by force of law. In addition, the Agency submitted two requests to the competent misdemeanor court for initiating misdemeanor proceedings.



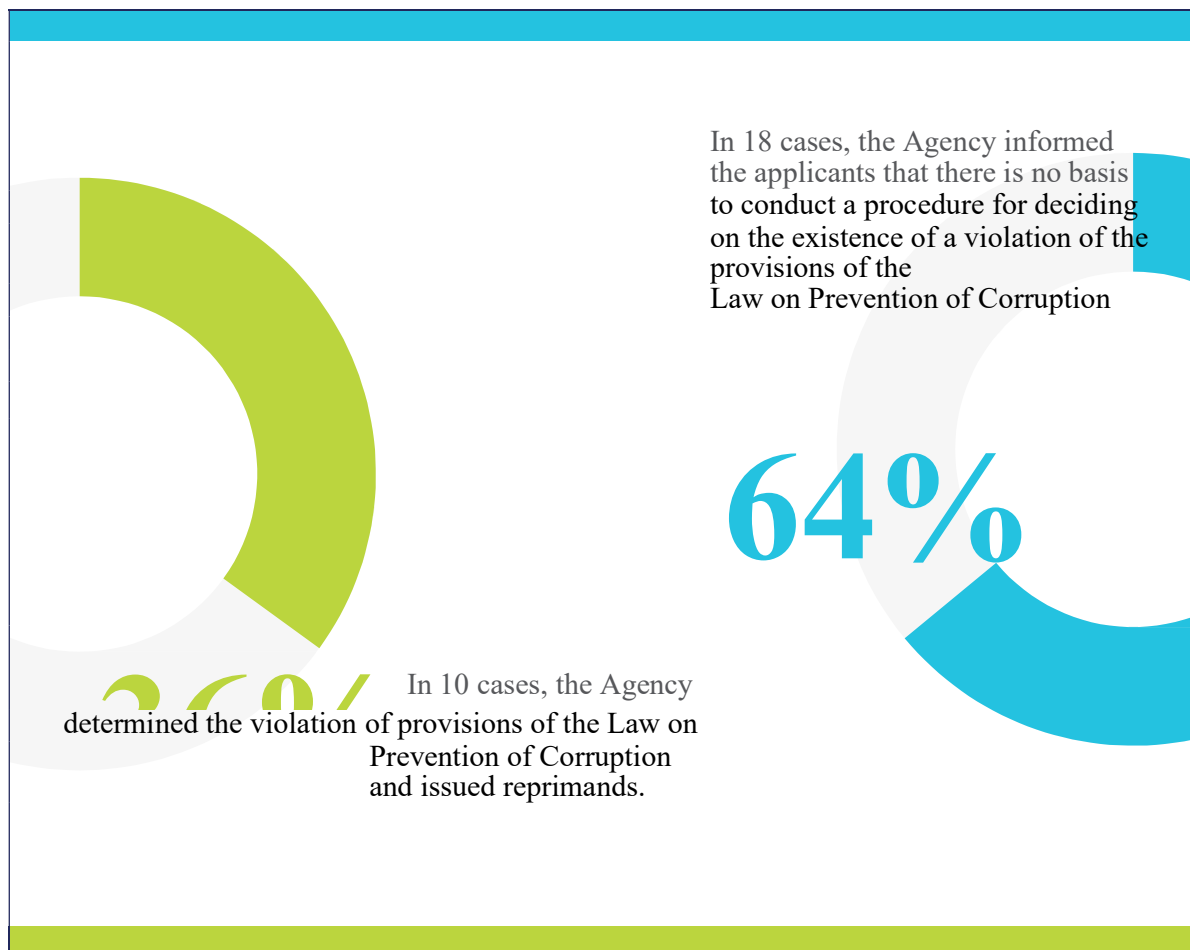
Misdemeanor courts issued a total of 15 decisions, based on requests for initiating misdemeanor proceedings against public officials submitted before and during 2023.



## ACTIONS OF THE AGENCY DURING THE ELECTION CAMPAIGN

In the course of the election campaign, after the scheduled local elections (for councilors of city assemblies and municipal assemblies in the Republic of Serbia) and parliamentary elections (for the election of deputies), as well as elections for deputies of the Assembly of the Autonomous Province of Vojvodina, announced for December 17, 2023, the Agency received 28 reports against public officials due to suspected violations of the provisions 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 the Prevention of Corruption (paragraphs 2, 4, and 5), measures were imposed on public officials in situations where they used public resources for the purpose of public representation of participants in the elections, used meetings that were in the capacity of a public official, and used public resources for the promotion of a political party, and they did not unequivocally present to the interlocutors and the public whether they were presenting the position of the body in which they perform their public function or the position of the political party.

In 10 cases, the Agency found violations of the Law on Prevention of Corruption and issued reprimands.



# REGISTERS AND SPECIAL RECORDS

The Law on Prevention of Corruption and the Law on Lobbying envisage that the Agency conducts:

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

The aforementioned records represent the basis of preventive and control mechanisms in the fight against corruption, which enable transparency in the work of public authorities and public officials, as well as establishing the responsibility of public officials in accordance with the obligations defined by the Law on Prevention of Corruption. The establishment of the aforementioned records enables the determination of which persons are subject to the obligations, prohibitions, and restrictions prescribed by law, and the accurate, correct, and efficient keeping of the registers is the basis for the implementation of some of the Agency's competences and the further determination of violations of the law.

## VERIFICATION OF REPORTS ON ASSETS AND INCOME OF PUBLIC OFFICIALS

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

Furthermore, the audit plan on assets and income enable the Agency to obtain data that is important for the work of other state bodies in combating corruption, as well as, in situations where the Agency determines irregularities, which may be important for the work, actions and cooperation with other state bodies, acts repressive - which represents a special and additional contribution in the field of fighting corruption.

During 2023, the accuracy, completeness and timeliness in the petition of reports for a total of 358 public officials were checked, of which 270 were according to the Annual Verification Plan for 2023.

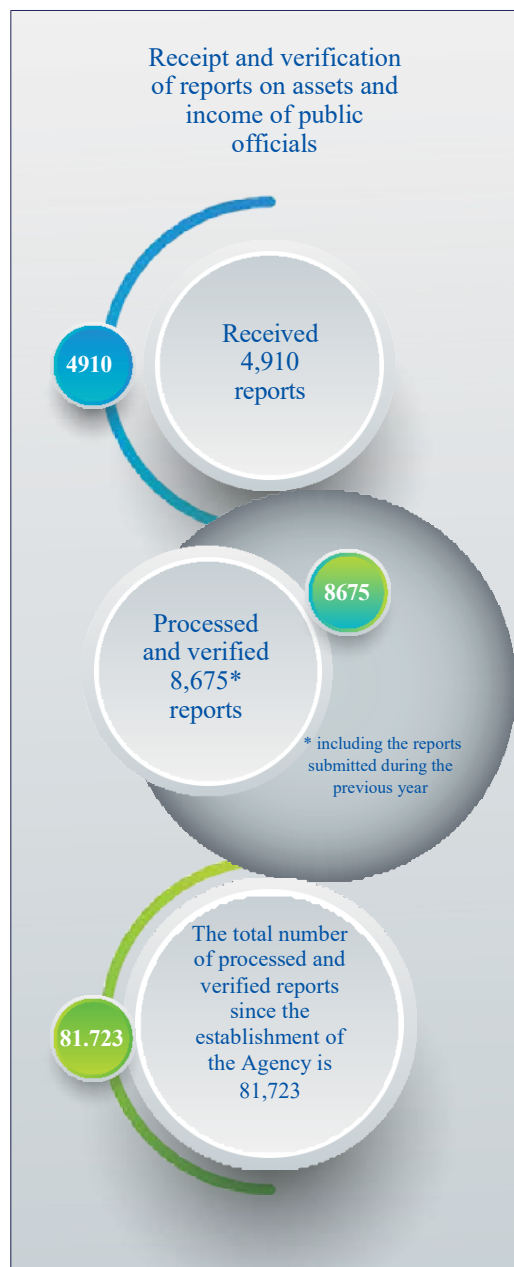
The Annual Verification Plan includes state secretaries in the ministries of the Republic of Serbia, heads of administrative districts, representatives of the Provincial Government, the president, vice president, secretaries and their assistants, as well as directors and deputy directors of health institutions.

In 2023, the verification of the property and income reports of 277 public officials was completed.

A total of 8 extraordinary verifications of the Reports of Public Officials were initiated due to the suspicion that accurate and complete data were not reported in the Reports

A total of 175 proceedings were initiated against public officials at the republican, provincial, and local levels of government for violating the Law on the Prevention of Corruption i.e. the delay in submitting reports on assets and income, as well as the failure to report important changes during the exercise of public office.

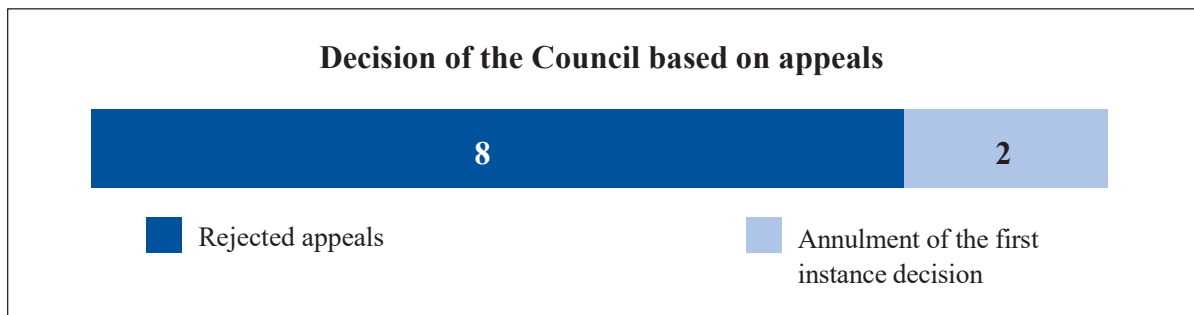
In the proceedings initiated during 2023, including the proceedings initiated in the previous year, the Agency imposed a total of 186 measures, of which 178 were reprimands and 8 were measures of public disclosure of the decision on the violation of the Law on Prevention of Corruption.



Structure of issued reprimands:

- due to untimely petition of a Report and due to the petition of an incorrect or incomplete Report after election or appointment to public office - 85 measures;
- due to untimely petition of the Report and due to petition of incorrect or incomplete Report upon termination of public office - 38 measures;
- due to untimely petition of the Report on significant changes in assets and incomes during the public office - 23 measures;
- due to cumulative violation of provisions committed by the same public official - 22 measures;
- due to untimely petition of the Notice on the absence of changes in property and income after re-election or appointment to public office - 10 measures.

The Agency Council received 10 appeals against the decisions of the Agency's Director, which issued reprimands to public officials.



A total of 157 requests for initiating misdemeanor proceedings were submitted due to non- petition of the Report or Notice within the prescribed deadline, i.e. petition of an incorrect or incomplete Report.

Year	Number of initiated proceedings	Number of reprimands filed	Number of submitted requests for initiating of misdemeanor proceedings	Number of criminal charges filed
2023	175	186	157	11
2022	356	365	201	6
2021	284	219	134	7

Misdemeanor courts issued a total of 178 decisions based on requests for initiating misdemeanor proceedings submitted before and during 2023.

At the proposal of public officials against whom the Agency submitted requests for the initiation of misdemeanor proceedings for untimely petition of the Report, based on Articles 233 and 234 of the Law on Misdemeanors, Article 108 of the Law on the Prevention of Corruption and the Instruction on the Procedure for Concluding Plea Agreements in Misdemeanor Cases the Agency concluded 6 such agreements with the defendants in 2022, setting fines.

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

Nine criminal charges and two reports were submitted to the competent prosecutor's offices on grounds for suspicion that the public official, with the intention of concealing assets and income, did not report them to the Agency or provided false information about them.

During 2023, the Agency was informed in 14 cases about the outcome of proceedings based on criminal reports and reports of the Agency, before and during the year 2023.

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
2023	1	0	8	2	3	0	0
2021	1	2	12	1	3	2	1
2021	3	0	24	2	10	1	1

Two reports were submitted to the Directorate for the Prevention of Money Laundering due to the existence of reasonable suspicion that officials, whose assets and incomes were subject to investigations, committed some other criminal offenses within the competence of that authority.



## Example

In accordance with the powers contained in the provisions of Articles 36 and 75 of the Law, the Agency requested from the competent authorities data on the recorded property status of the public official, his wife and minor children living in the same family household.

Upon reviewing the submitted reports on the assets and income of public officials, it was determined that the public official stated in the Report from 2020 that, according to the 2017 probate decree, he inherited a monetary claim of EUR 200,000 against the debtor A.B. Moreover, he reported that in 2019, he acquired an apartment and a garage through inheritance, while in the 2021 Report, he reported that in 2020, he acquired through inheritance another garage at the same address as well as a cottage.

After the analysis of the data of the state authorities and the data from the report, the public official was requested to declare the discrepancies that were established during the verification procedure, as well as to submit documentation on the legal basis for the acquisition of immovable property and movable property that is subject to registration in his ownership and owned by the wife.

The public official submitted a statement, with attached documentation, on the basis of which it was determined that, based on the 2019 Real Estate Purchase and Sale Agreement, he acquired ownership rights to an apartment with an area of 170 m<sup>2</sup> and a garage, for a purchase price of EUR 300,000. On the basis of the 2020 Real Estate Purchase and Sale Agreement, which he concluded with the company, he acquired the right of ownership in the garage space, with an area of 12 m<sup>2</sup>, at a price of EUR 10,000. Furthermore, in the same year, on the basis of a sales contract, he acquired the right of ownership of a family residential building with an area of 300 m<sup>2</sup>, and a plot of land (cottage) at a price of EUR 65,000.

According to the statement, the public official paid for the purchase of the real estate in question from the money he received based on the probate decision, that is, on behalf of a monetary claim based on the assumption of debt in the amount of EUR 200,000.

Having in mind the above, in a letter the public official was asked to submit the documentation on the basis of which the claim arose between the decedent and the debtor, a statement on the assumption of the debt as well as proof of the receipt of money from the debt acceptor.

In his reply to the letter, he stated that he does not have written documentation on the basis of which the claim arose, and submitted a certified statement of the debt collector on the assumption of the debt, as well as receipts on the return of the debt, in the period from 2018 to the end of 2021, in total in the amount of EUR 100,000.



Having in mind the above, the Agency sent the competent state body an initiative to start the procedure of collecting data, information and documentation for public officials and related persons.

By analyzing the obtained data and documentation, it was determined that the public official paid the amount of EUR 105,000 into foreign currency accounts from which he paid for real estate; that in 2022, a related person of a public official paid RSD 9,000,000 in cash and soon another RSD 1,000,000 as well as about EUR 50,000 into foreign currency accounts; that gifts in the amount of EUR 100,000 were made for the purchase of real estate by a public official, as well as monetary gifts made by a person who, according to reports, did not have any cash savings.

Moreover, it was determined that the debt collector, who returned a total of EUR 100,000 to the public official by the end of 2021, does not have significant funds in his bank accounts.

Based on the documentation collected during the verification process, it was established that the public official and related persons, in the period from 2019 to 2023, allocated about EUR 375,000 for the purchase of real estate and passenger vehicles, which exceeds the amount of EUR 200,000 of claims that allegedly inherited by a public official, which is why there is doubt about the origin of the mentioned funds, and the report was submitted to the competent public prosecutor's office for further jurisdiction and action.



## GIFTS

A public official and a family member are not allowed to receive gifts in connection with public office, with the exception of protocol and occasional gifts. Received occasional and protocol gifts become public property, in accordance with the law governing public property. The law stipulates the conditions under which a public official may keep a gift.

Public authorities maintain a Record of Gifts received by public officials and members of their families, and are obliged to submit a copy of the Record to the Agency by March 1<sup>st</sup> of the current year for gifts received in the previous year.

Based on the Records it receives, the Agency maintains a Catalog of Gifts that were given to public officials. The Catalog of Gifts for the year 2022 was published within the legally prescribed time period, by June 1, 2023, and includes 431 protocol and occasional gifts, which public officials from 35 bodies of all levels of government, during 2022, received in connection with public office.

In the reporting period, the most gifts were reported by: the General Secretariat of the President of the Republic, the Ministry of Internal Affairs, the Ministry of Defense and the Ministry of Foreign Affairs.

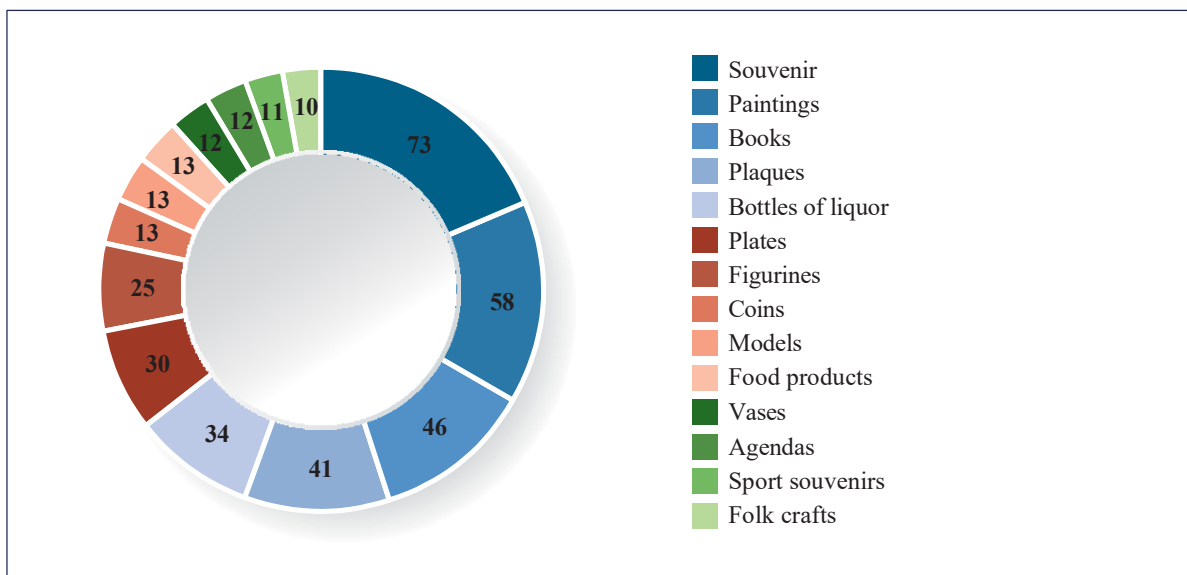
The Agency also prepared an Analysis of the Catalog of Gifts received in 2022, which includes statistical processing of data from the Catalog of Gifts, taking into account their most important elements, as well as their comparison with previous years.

The statistical analysis of the Catalog of Gifts for 2022 shows: the number of gifts by year, the number of gifts by type, the ownership of gifts, the division of gifts by level of government, the division of gifts by regime of ownership, the relationship between the office and ownership, a list of countries that gave the gifts and a list of public officials who received them

Out of the total number (431) of gifts received in connection with public office, there are more protocol gifts (316) than occasional gifts (115). The majority of public officials, 23 of them, transferred all received gifts into public property. Five public officials kept certain gifts in their personal property, and transferred some to public property. Fourteen public officials kept all gifts in their personal possessions. In terms of the number of gifts transferred into public property, the largest numbers were transferred by ministers - a total of 147, while the President of the Republic of Serbia holds the second place with 111. When it comes to gifts kept in personal property, the largest number of gifts were kept by directors, a total of 21, followed by ministers with 20 gifts.

The value of the gifts ranges from RSD 200.00 to RSD 250,000, while the estimated monetary value of the largest number of gifts ranges from RSD 3,000 to RSD 10,000. For 45 gifts, the monetary value assessment was not carried out until the analysis was made.

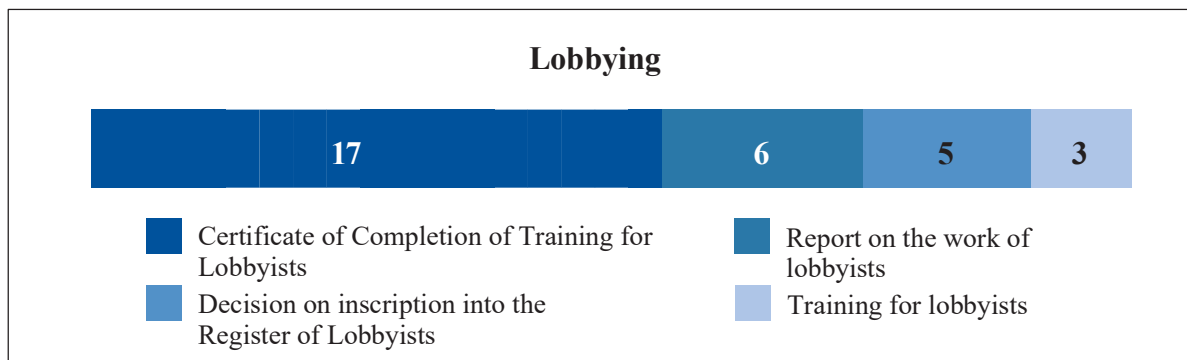
You can see the characteristic conclusions contained in this analysis on the Agency's internet presentation: [https://www.acas.rs/cyr/page\\_with\\_sidebar/istrzivanja#](https://www.acas.rs/cyr/page_with_sidebar/istrzivanja#)



## LOBBYING

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

Lobbying is a legally regulated activity and the Agency is entrusted with significant powers in this area.



In 2023, the Agency held three training sessions for lobbyists, which were attended by 18 candidates. After checking the knowledge of the training program, the participants received a Certificate of Completion of Training for Lobbyist. Five decisions on entry in the Register of Lobbyists were made and one decision on deletion from the register of legal entities that carry out lobbying. Six Reports on the work of lobbyists and one report of a legal entity carrying out lobbying. The agency received one notification from lobbyists about lobbying contacts.

## **ANALYSIS OF THE RISK OF CORRUPTION IN REGULATIONS**

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

In 2023, the Agency, by applying the Methodology on Corruption Risk Assessment in regulations based on the request of the authorized proposers of the law for giving opinions, drafted eight opinions on regulations in the fields of particularly risk of corruption and regulations governing issues covered by confirmed international agreements in the field of prevention and fight against corruption on:

- Draft Law on the High Judicial Council - Ministry of Justice,
- Draft Law on Public Prosecution - Ministry of Justice,
- Draft Law on Judges - Ministry of Justice,
- Draft Law on High Prosecutor's Council - Ministry of Justice,
- Draft Law on Organization of Courts - Ministry of Justice,
- Draft Law on the Management of Companies Owned by the Republic of Serbia - Ministry of Economy,
- Draft Law on Amendments to the Law on Prevention of Corruption - Ministry of Justice and,
- Proposal for a Regulation on Central Personnel Records - Ministry of Public Administration and Local Self-Government

From the given opinions, the Agency informed the applicant in one case that there were no objections to the draft in relation to which it assessed the risk of corruption, while in seven opinions, it pointed out the risk factors and risks of corruption in the provisions of the regulations and gave recommendations for their elimination.

The Agency gave its opinion on the Proposal for a Regulation on Central Personnel Records, although it is not a draft law, in accordance with Article 47 of the Rules of Procedure of the Government.

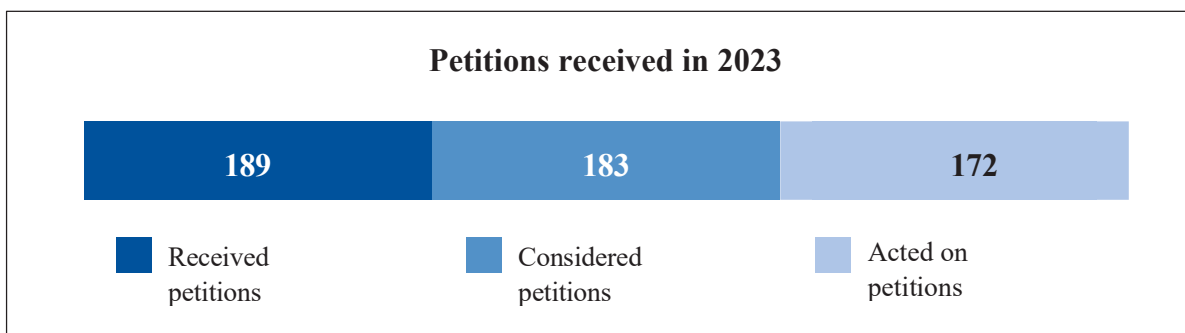
In order to implement the Strategic Plan for the Fight against Fraud and Management of Irregularities in the Disbursement of European Union Funds in the Republic of Serbia for the period between 2021 and 2023, which are under the competence of the Agency, the Agency

implemented the Operational Plan of the Agency for the year 2023. Also, the Agency held five trainings for authorized proposers of regulations on the application of the Methodology on Corruption Risk Assessment in regulations based on the request of the authorized proposers and they also included a segment protection of EU financial interests:

- local self-government units in Užice and Novi Pazar, and
- authorized proposers of laws for employees in the Ministry of Construction, Transport and Infrastructure, the Ministry of Public Administration and Local Self-Government, and the Ministry of Education.

## PROCEEDING ON PETITIONS

Submitting a petition to the Agency is a way for natural and legal persons to present facts that cause suspicion of corruption and inform the Agency of certain irregularities in the work of public authorities. When acting on petitions, the Agency evaluates them, forwards them to the competent authority, collects the necessary information and evidence, examines the merits of the petition independently or through the competent authorities, submits a criminal complaint or a request to initiate misdemeanor proceedings, analyzes the petition, and informs other organizational units about the completed analysis. Agencies and public authorities inform the applicant about the outcome of the procedure.

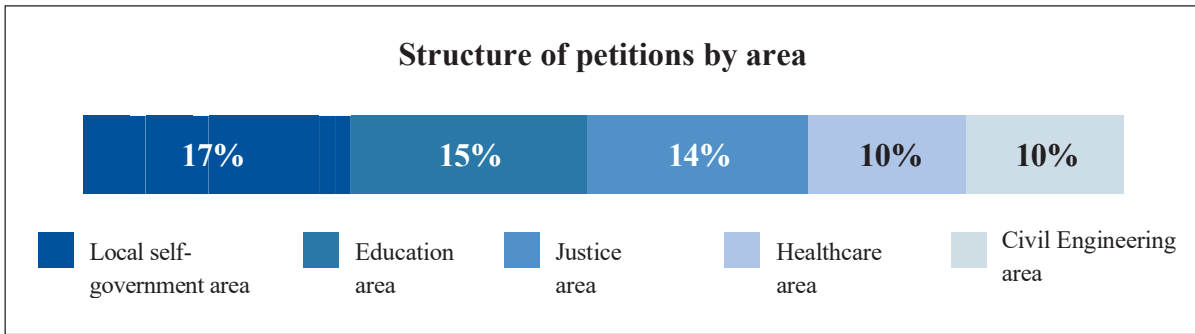


Out of all petitions received, as many as 56, or 29.63%, were submitted by unidentified persons.

The largest numbers of petitions were related to the competence of inspection bodies and prosecutor's offices, to which the Agency forwarded petitions for processing, with the protection of the identity of petitioners, as prescribed by the Law on Prevention of Corruption.

The proceedings of 93 cases, or the total number of petitions received during the reporting period, were terminated on the grounds of insufficient evidence to support the allegations.





In the structure of new petitions, most of them are from the fields of local self-government, education (14.81%), justice, health, and civil engineering. The fewest applications are from the fields of mining and energy, sports, and agriculture. Considering that the records of applications by sectors are kept on the basis of the predominant content of the application, as well as the fact that the largest number of applications refer to more than one sector, it should certainly be pointed out that, as the second mentioned sector in the content of the applications, the sector of public procurement most often appears.

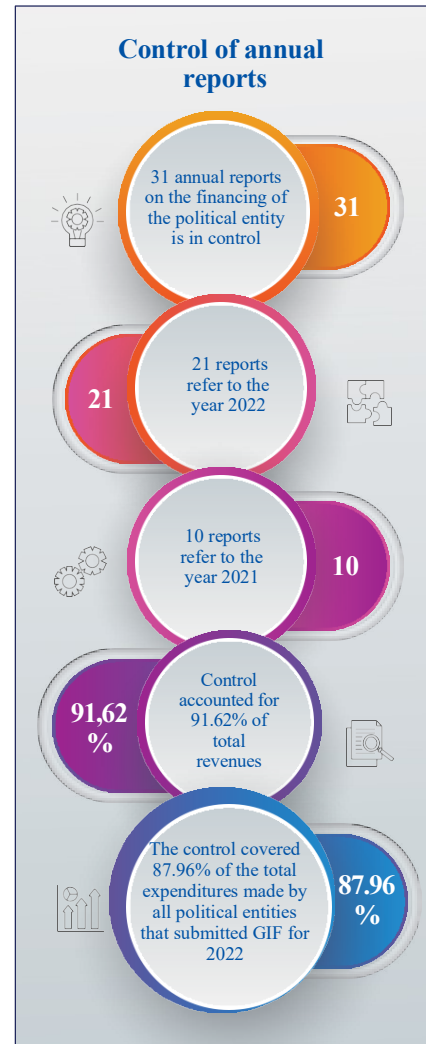
## CONTROL OF THE FINANCING OF POLITICAL ACTIVITIES

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

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

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

In the previous year, the Agency controlled annual reports on the financing of political entities, which all registered political parties and citizen groups that have representatives submitted to the Agency by April 30<sup>th</sup>



of the current year for the previous year. These reports contain data on contributions and assets, that is, data on the origin, amount, and structure of all funds collected and spent from public and private sources, credits, and loans.

The legal obligation to submit the Annual Financial Statement for 2022 was fulfilled by 179 political entities, of which 80 are political parties and 99 groups of citizens.

The results of the control of the annual financing reports are published on the Agency's website [https://www.acas.rs/cyr/page\\_with\\_sidebar/politicki\\_subjekti#](https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#), in the form of the Report on the Control of the Annual Reports on the Financing of Political Entities for 2022.

Elections for members of Parliaments, councilors for the Assembly of the City of Belgrade, deputies for the Assembly of the Autonomous Province Vojvodina and 64 cities and municipalities in Serbia were carried in 2023.

The Agency organized and implemented the monitoring of the election activities of political entities that participated in the above elections. The selection and training of election campaign observers was carried out, and 144 field observers were engaged in several cities throughout the Republic of Serbia. Ten central coordinators from among the employees of the Agency were engaged to monitor and control the work of observers in the field.

In the aforementioned elections, political entities with declared electoral lists had the obligation to submit to the Agency, seven days before the voting, a preliminary report on the expenses of the election campaign, referring to the period from the day the election was announced to 15 days before the day designated for voting. They were also obliged to submit the final Report on the expenses of the election campaign within 30 days from the date of publication of the comprehensive Report on the election results.

The statutory obligation to submit the final Report on the expenses of the election campaign was fulfilled by 312 political subjects, or 75%, while the deadline for submitting final reports on election campaign expenses expired in January, or February 2024.

The Agency will control submitted reports on election campaign expenses in accordance with the 2023 Election Campaign Expense Control Plan, which was published on the Agency's website. [https://www.acas.rs/cyr/page\\_with\\_sidebar/izbori#](https://www.acas.rs/cyr/page_with_sidebar/izbori#).



In the reporting period, 67 procedures were initiated due to suspected violations of the provisions of the Law on Financing of Political Activities, of which 57 related to the election campaign;

- 11 reprimands were issued due to violation of the Law in regular work;
- During the election campaign, on the basis of the submitted applications, a total of 29 decisions were made, of which a reprimand was issued in eight cases, in one case a violation of the law was established and is the basis for submitting a request for initiating misdemeanor proceedings, while in 20 cases the violation of the Law was not found. All of these decisions were published on the Agency's website within the appointed period;
- On the basis of legally binding judgments that imposed fines, 62 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 a political party, that is, a group of citizens, has representatives in the representative bodies).

Due to the violation of the provisions of the Law on the Financing of Political Activities, the Agency submitted a total of 94 requests for initiating misdemeanor proceedings, namely:

- 77 requests were submitted due to non-petition of the annual financing report;
- 6 requests were submitted due to non-use of at least 5% of funds received for regular work from public sources for professional development and work with membership;
- 3 requests were submitted due to an illegal loan;
- 2 requests were submitted due to misuse of funds, while the remaining six requests were submitted due to other violations of the Law.

Acting on the requests of political subjects, the Agency provided 16 responses, that is, opinions on the application of the provisions of the Law on Financing Political Activities.

In accordance with the provisions, the Agency informed the Tax Administration of the Republic of Serbia about the ones who donated to political entities in 2022, which are listed in the annual Reports on the financing of political entities, as well as the Reports on the expenses of the election campaign of political subjects, and were subjected to control.

**Trainings for representatives of political entities and observers**

12 trainings were held for representatives of political entities on Implementation of the Law the topic " on the Financing of Political Activities and Petition of Annual Reports on Financing and Reports on Election Campaign Expenses"

The selection procedure and training for election campaign observers was carried out for 144 field observers

In cooperation with the international organization International Foundation for Electoral Systems (*IFES*), an online training module was developed for the application of the Law on Financing of Political Activities



# INTEGRITY PLAN

To ensure the efficient and effective functioning of public sector institutions, it is crucial to develop and implement an integrity plan that systematically introduces good management mechanisms into institutions and eliminates all potential and real risks of corruption. The integrity plan is a document that is created, adopted, and implemented in cycles. Each cycle lasts for three years. The third cycle of drafting, implementing, and reporting on the implementation of integrity plans in the Republic of Serbia is underway. In the third cycle, 2,969 institutions are required to develop and implement an integrity plan, and 2,965 have adopted their integrity plan, which represents 99.87% of the total number of institutions. Bearing in mind that a large number of institutions in the public sector simultaneously adopt and implement this mechanism, the Agency is in charge of coordinating the development and adoption of integrity plans. The integrity plan is both a process and a document that serves public authorities to analyze the risks of corruption and determine priorities and adequate measures for their prevention.

In the area of implementation of this competence, the Agency carried out the following activities in 2023:

- Monitoring the quality and objectivity of integrity plans was completed in the third cycle, and reports with recommendations were prepared;
- The "Report on monitoring the quality and objectivity of prepared integrity plans" was prepared for the process "Handling financial resources received from the EU and other international funds";
- The report "Effects of developing and implementing the integrity plan in the second cycle" was prepared<sup>1</sup>;
- Six trainings called "The importance of the integrity plan and the method of its preparation in the third cycle" organized by the Agency were held;
- In cooperation with the Ministry of Internal Affairs, the Republic Pension and Disability Insurance Fund, and the Institute for European Affairs, three trainings were held on the integrity plan - assessment of the risk of corruption in the institution.

## Supervision of the development of integrity plans

After the expiration of the deadline for the preparation of the integrity plan in the third cycle, the Agency began monitoring the quality and objectivity of their adoption. Bearing in mind the number of prepared integrity plans, direct supervision was carried out in accordance with the supervision plan on a sample of 16 selected institutions from six different systems in seven cities: Belgrade, Vranje, Arandjelovac, Negotin, Vrnjačka Banja, Ivanjica, Loznica. The supervision covered the quality of the integrity plan development procedure, as well as the quality and objectivity of the assessment of the risk of corruption in the work process.

Many institutions have objectively concluded that there is need for improvement in the areas of ethics and personal integrity, particularly in the area of manager and employee education.

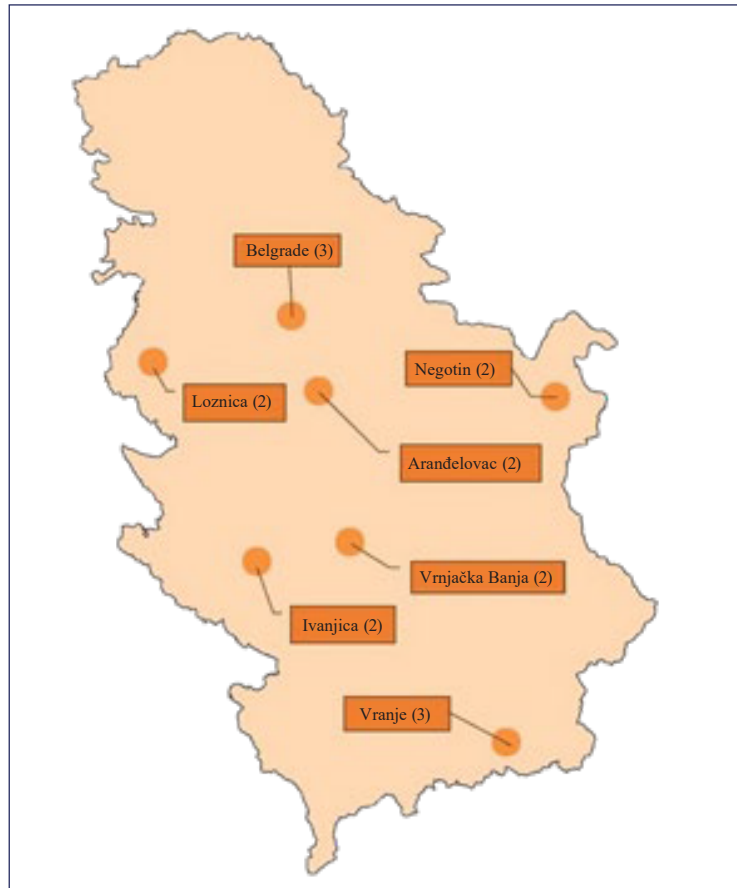
<sup>1</sup> The report "Effects of developing and implementing the integrity plan in the second cycle " is available on the Agency's website [https://www.acas.rs/cyr/page\\_with\\_sidebar/plan\\_integriteta](https://www.acas.rs/cyr/page_with_sidebar/plan_integriteta)



In the context of the implementation of the Strategic Plan for the Fight against Fraud and Management of Irregularities in the Disbursement of European Union Funds in the Republic of Serbia for the period 2021-2023. Based on the conducted supervision, the Agency prepared a special report in relation to the process called "Handling financial resources received from the EU and other international funds".

Based on the statistical and content analysis of the data, it was observed that the institutions in the above-mentioned process identified that they lack internal acts (procedures) that regulate the method of reporting and the procedure for reporting irregularities and suspicions of fraud that may

arise in the handling of the received financial resources, internal acts that regulate the procedure for recognizing (identifying) irregularities and suspicions of fraud that may arise in the handling of received financial resources, as well as acts that regulate the management of received financial resources from international funds.



## Report on the effects of the integrity plan in the second cycle

In order to consider the effects of the preparation and implementation of the integrity plan and to improve the methodology, the Agency examined the perceptions of public institutions who reported on the implementation of integrity plans in the second cycle on the effects of the preparation and implementation of the integrity plan. Public institutions had the opportunity to assess whether, and to what extent, the integrity plans contributed to the improvement of the value and functioning of the institutions, as well as to provide specific examples from the practice of the aforementioned contribution, in the online questionnaire "Effects of developing and implementing the integrity plan in the second cycle", on which the Agency prepared a report.

The perception survey was conducted on a sample of 1,727 institutions that, according to the Agency's records, submitted a report on the implementation of the integrity plan in the second cycle. The questionnaire was answered by 456 institutions (26%). Based on the analysis of the data obtained from the questionnaire, 97% of the institutions assessed that the preparation and implementation of the integrity plan contributed to a certain extent to the improvement of the work and functioning of the institution.

## Integrity plan trainings

For the quality and objective preparation of the integrity plan, it is essential to understand the purpose of the preparation and implementation of this preventive mechanism and its impact on strengthening institutional integrity.

In 2023, six trainings were organized by the Agency for representatives of persons liable to prepare an integrity plan, and three trainings were organized and invited by other legal entities (the Ministry of the Interior, the Republic Pension and Disability Insurance Fund, and the Institute for European Affairs).

A total of 340 participants were trained on the concept, importance, and essence of adopting an integrity plan, identifying and assessing the risk of corruption and other irregularities in institutions, and the application of adequate measures to influence the reduction of corruption in work processes. In addition to training, the Agency has also produced educational materials (manuals, technical instructions, video material, etc.) in order to provide support to public authorities in the process of developing and implementing an integrity plan.

### Examples of good practice

Despite not being legally required, 27 institutions from various systems prepared an integrity plan in the third cycle. Among them are three newly formed ministries: the Ministry of Information and Telecommunications, the Ministry of Science, Technological Development, and Innovation, and the Ministry of Tourism and Youth.

The institutions where more than a third of the employees answered the questionnaire are Elementary School "Vuk Stefanović Karadžić" from Negotin (83%), the Ministry of Sports (64%), the Municipality of Ivanjica (42%) and Elementary School "Jovan Jovanović Zmaj" from Vranje (33%). The questionnaire for employees is an important segment of the preparation of the integrity plan because it gives them the opportunity to indicate the effects of the application of regulations and procedures in practice. That is why it is important that the working group, when assessing the risk of corruption and determining adequate measures, consider the collected answers of the employees.

The internal audit of the City of Loznica is an example of the organized, systematic, and comprehensive establishment of this mechanism, starting from the internal acts that regulate its work (the Charter of Internal Audit, Code of Ethics, Strategic Plan, Annual Plan, etc.) to the implementation of multiple internal audits, the preparation of reports with recommendations, and the training attended by the internal auditor.



## LOCAL ANTI-CORRUPTION PLAN (LAP)

The local anti-corruption plan (hereinafter: LAP)<sup>2</sup> 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 the activity 2.2.10.31 of the Revised Action Plan for Chapter 23, the Agency collects data and reports on the monitoring and implementation of LAP, as well as the formation of bodies for their monitoring. During 2023, the Agency carried out the following activities within this area:

- Prepared and published on the Agency's website four reports 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 2023, three local self-government units (hereinafter: LGUs) reported to the Agency on the adoption of the LAP. Analysis of the submitted data determined that the City of Bor developed its anti-corruption plan as early as 2019, and the municipalities of Golubac and Kula did so in 2022. For the preparation of LAP, the City of Bor and the Municipality of Golubac had expert assistance obtained through project financing;
- From April 2017 to the end of 2023, a total of 114 (78%) LGUs adopted LAP, of which 98 (86%) were created according to the model developed by the Agency. The majority, 89% of the LAP, was adopted before 2020 and the deadlines for implementing the activities expired several years ago.

In 2023, only one LGU formed a body to monitor the implementation of LAP, which indicates that the trend of slowing down continues and that the total number of LGUs that formed this body (since the beginning of the application of this mechanism) is small - only 39 (27%) LGUs.

The majority, 27 bodies, were formed mainly in accordance with the Agency's model, with two partially and seven with significant deviations, while for three bodies there is not enough data to give an assessment of compliance. Obligation from Activity 2.2.10.31. A total of 27 (19%) local governments completed the Revised Action Plan for Chapter 23, which includes the adoption of the LAP and the formation of a body to monitor its implementation, mostly in accordance with the Agency's model.

### Examples of good practice

The city of Kikinda, the municipality of Beočin, and the municipality of Sokobanja revised the existing anti-corruption plans in 2023 so that the activities are carried out until 2026.

The municipality of Kladovo is the only local self-government that in 2023 formed a body to monitor the implementation of the LAP, in accordance with the addition of the LAP model and with expert assistance.

<sup>2</sup> You can see more details about LAP on the Agency's website: [https://www.acas.rs/cyr/page\\_with\\_sidebar/lap](https://www.acas.rs/cyr/page_with_sidebar/lap)

# INDIVIDUAL INTEGRITY STRENGTHENING

## Education on ethics and integrity as a mechanism for preventing corruption

Educating employees on ethics and integrity is an important factor in professional socialization because it creates a uniform understanding of ethical standards and an organizational culture that does not tolerate unprofessional behavior. Education of this type primarily aims to improve the competencies of employees but consequently also affects the strengthening of institutional integrity, thereby manifesting its full potential as a preventive anti-corruption mechanism.

In the field of education on ethics and integrity, the Agency implemented the following activities in 2023:

- Created educational material/training on the impact of corruption on particularly sensitive categories of the population and placed it on a distance learning platform;
- Created 38,061 user accounts for remote training participants;
- Trained a new group of 15 trained implementers of training on ethics and integrity; Conducted two "Ethics and Integrity" trainings for civil servants and one "Solving ethical dilemmas" training for civil servants in positions at the National Academy for Public Administration;
- Accredited special professional training program in the field of corruption prevention for 2023;
- Prepared Report on the implementation of the "Ethics and Integrity" training in public authorities in 2022.

## Distance training

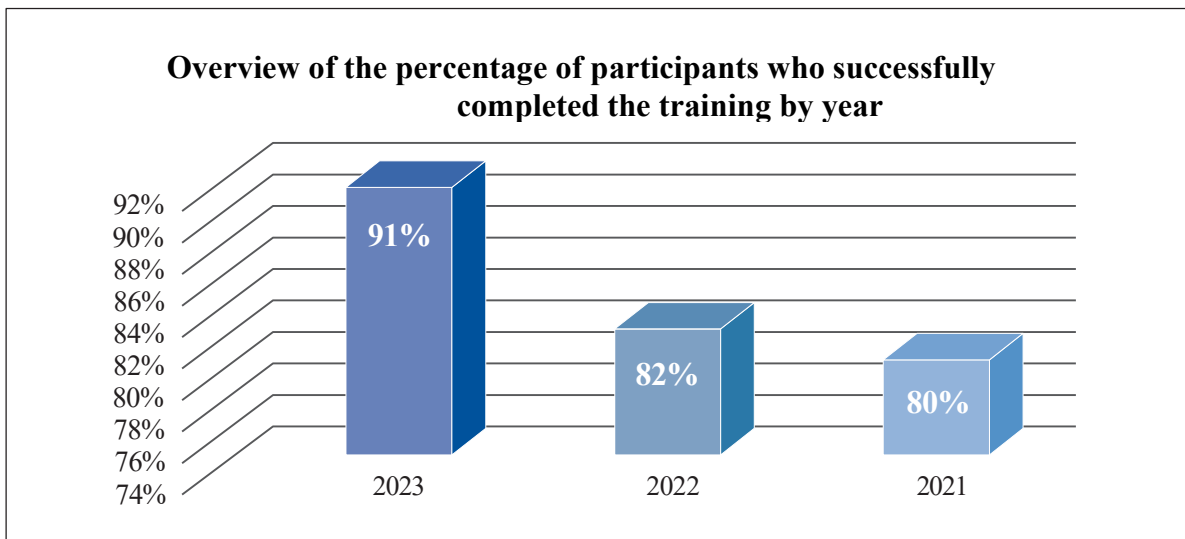
In accordance with the instructions for conducting training in the field of preventing corruption and strengthening integrity, public companies and other legal entities, whose founder or member is the Republic of Serbia, an autonomous province, a local self-government unit, or a city municipality, during 2023 had the obligation to conduct "Ethics and Integrity" training.

The dominant way of conducting the training was through distance training (online), which is quite expected, taking into account its many advantages that were demonstrated in the previous period: enabling participants to adjust the time and dynamics of attendance to their business obligations and access the training content at every moment.

In the reporting period, 38,061 user accounts were created for employees of 337 public authorities. Out of the total number of participants mentioned, 34,550 of them successfully completed the distance training by passing the knowledge test.

It is noticeable that this year the percentage of training participants who successfully completed it increased significantly compared to the previous two years (82% in 2022 and 80.3% in 2021). All users who have successfully completed distance training are able to download an electronic certificate from their user account.





### **Training for lecturers (educated trainers of ethics and integrity training)**

The Agency also conducted training for lecturers (training for trainers) in the field of ethics and integrity, which was attended by 15 employees from public enterprises, institutions and administrations of the City of Novi Pazar and the Municipality of Raška. The aim of the five-day training for trainers was to strengthen the competencies of the participants to independently implement the “Ethics and Integrity” training in the authorities in which they are employed.

### **"Ethics and Integrity" trainings at the National Academy for Public Administration**

At the National Academy for Public Administration, the Agency’s accredited implementer held two trainings, "Ethics and Integrity" which was attended by 23 participants, of which 17 were women and 6 were men, as well as the training "Solving Ethical Dilemmas" for appointed civil servants in positions within the project "Strengthening the Professional Capacities of Appointed Civil Servants in Serbia". At the latter training, 9 appointed civil servants (three women and six men) had the opportunity to improve their knowledge and decision-making skills in ethically challenging situations.

### **Special Professional Training Program in the field of corruption prevention for 2023**

As in previous years, the Agency developed a special professional training program in the field of corruption prevention for the year 2023, which was accredited by the National Academy for Public Administration. The program includes six trainings that the Agency conducts, in accordance with its competences: "Obligations of public officials according to the Law on Prevention of Corruption and the Law on Lobbying", "Assessment of the risk of corruption in regulations as a mechanism for preventing corruption", "Integrity Plan (assessment of the risk of corruption in the institution)", "Director as the driver of building institutional integrity", "Ethics and integrity" and "Training for lecturers on ethics and integrity".

## Report on the implementation of the "Ethics and Integrity" training in public authorities

Based on data on the implementation of training during 2022 and reports submitted by institutions founded by the Republic of Serbia, an autonomous province, a local self-government unit, or a city municipality, analyses were made and a report was written that contains a statistical overview of all training implementation modalities, reporting information, identified challenges, and recommendations that institutions should implement in the next cycle.

### A characteristic example

In the last year of the first cycle of conducting the "Ethics and Integrity" training, it is possible to make comparisons between individual categories of public authorities when it comes to the professional training of employees. Professional development is mostly controlled by general acts in the Republic of Serbia, Autonomous Province of Vojvodina, local self-government units, and most institutions (like schools and hospitals), public businesses, and other legal entities whose founder or member is the Republic of Serbia, an autonomous province. However, this is not controlled in a structured way by the local self-government unit or the city municipality. This fact is directly reflected in the number of public authorities that register employees for remote training. During 2023, slightly more than one third (33.90%) of the authorities that had the obligation to conduct training registered participants, which is significantly less compared to the previous two years (62% in 2022 and 75% in 2021).

Examples of good practice are authorities that have elaborate employee education procedures, a developed human resource management policy, an internal audit, or a person in charge of ethics and compliance issues. In this category, the following stand out: "Telekom" a. d. Belgrade, "Dunav osiguranje" a. d. o, JKP "Beogradski vodovod i kanalizacija", Infrastruktura železnice Srbije a. d, "Srbijavoz" a. d, Akcionarsko društvo "Elektroprivreda Srbije", JP "Pošta Srbije", JKP "Parking servis" Belgrade, the Republic Fund of Health Insurance and the Republic Pension and Disability Insurance Fund, because they worked systematically, motivated, and committed to the implementation of the training, which resulted in a great number of employees who attended and successfully completed the training.

Monitoring the number of registered participants, which rapidly increased during the last months of the year, it has been revealed that the observed trend of lacking planning for training implementation and a campaign approach to professional development continued in the previous year. Employed in the bodies required to conduct training in 2023, half of the training participants (50.62%) registered in the last four months of the year.



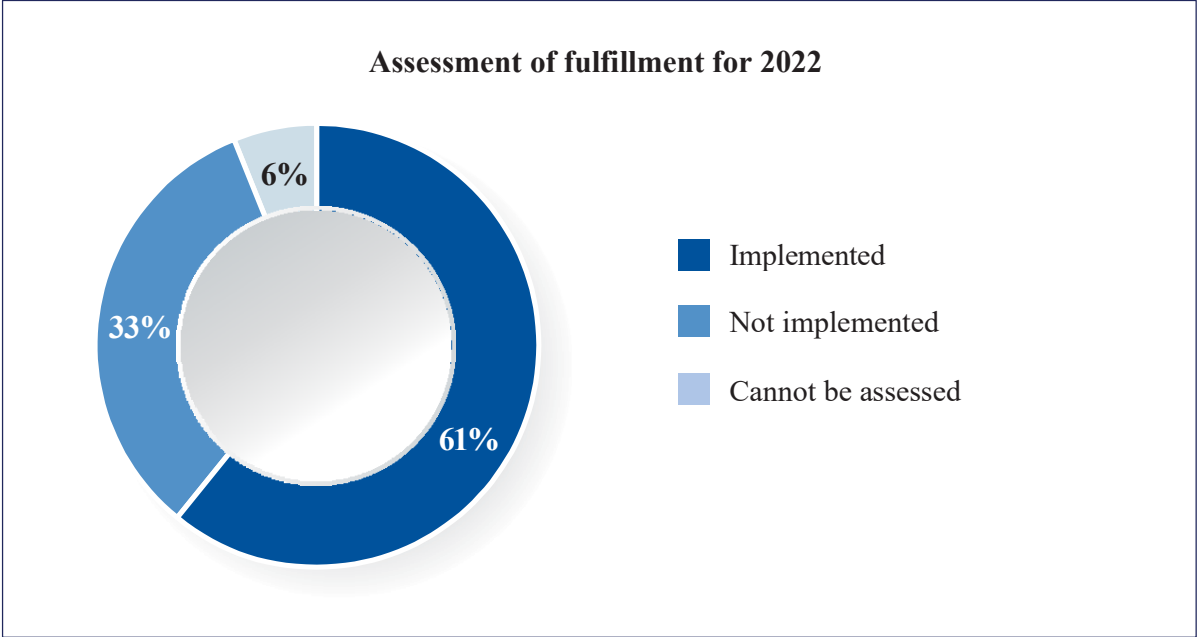


# SUPERVISION ON THE IMPLEMENTATION OF NATIONAL STRATEGIC DOCUMENTS AND PARTICIPATION IN THEIR DRAFTING

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

As part of the supervision of the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Fight against Corruption, the Agency prepared the Third Implementation Report for 2022<sup>3</sup>, and it was submitted to the National Assembly on March 27, 2023.

In the reporting period, the Agency assessed 87 activities, that is, those that are continuous in nature, those that were due in 2022, and those that were assessed as not implemented in the First and Second Implementation Reports; as those that the Agency was not able to assess in the Second Implementation Report. According to the Agency's assessment, of the 87 activities, the majority, or 61% were implemented.



<sup>3</sup> Report on the implementation of the Revised Action Plan for Chapter 23 – Subchapter: Fight against Corruption for the year 2022



## **Preparation of the Final Report on monitoring the implementation of the Operational Plan for the Prevention of Corruption in Areas of Special Risk**

The Government of the Republic of Serbia adopted the Operational Plan on September 30, 2021, and it was scheduled to last until the end of 2022. With the Revised Action Plan for Chapter 23, the supervision of the implementation of anti-corruption measures, provided for in the Operational Plan, is entrusted to the Agency for the Prevention of Corruption. After the end of the last quarter of 2022 and the termination of the validity of the Operational Plan, the Agency collected data from the persons responsible for reporting on the implementation of activities and the fulfillment of the measures defined in the Operational Plan and produced the third, Final Report showing the status of fulfillment of all measures, implementation of all activities, and recommendations for further action in connection with future strategic documents in this area<sup>4</sup>. The Operational Plan defines 15 measures and 46 activities. The Agency assessed the fulfillment of 15 measures defined in the Operational Plan, of which 3 (20%) measures were implemented; 11 (73.3%) measures were not implemented; 1 (6.7%) measure could not be assessed. The Agency assessed the fulfillment of 46 activities defined by the Operational Plan, of which 35 (76.1%) activities were implemented in accordance with the indicator, (mostly in the described manner, but not always within the time frame provided by the Operational Plan), 11 (23.9%) activities were not implemented or were not implemented in accordance with the indicator. All of the activities could be assessed. The Ministry of Justice and the working group received five recommendations in the report for the creation of future strategic documents in the fight against corruption.

## **Preparations for the development and adoption of the new National Strategy for the fight against corruption and the accompanying action plan for its implementation**

As part of the preparation process for the development of the future National Strategy for the fight against corruption and the accompanying Action Plan for its implementation, on March 24 and 28, 2023, the Agency held trainings for the implementation of the common Methodology for assessing the risk of corruption for the representatives of public authorities who participated in developing a corruption risk assessment for each particularly risky area of the future National Strategy and accompanying Action Plan. 32 representatives from state bodies and other organizations attended the trainings. After the trainings, five subgroups were formed, whose task was to prepare risk assessment reports in each of the areas that were assessed as particularly risky for the emergence of corruption, using the Methodology. In 2023, the working subgroups convened a total of 48 meetings, following which they prepared risk assessment reports. These reports served as the foundation for ex ante analysis, which shaped future strategic documents. Although the Agency, as a body responsible for supervising the implementation of strategic documents in the field of fighting corruption, had observer status in the working group for the preparation of national strategic documents for fighting and preventing corruption, its representatives participated in almost all meetings of the working subgroups and contributed to all stages of drafting the National Strategy for the Fight against Corruption for the period 2024–2028 and the Action Plan for its implementation for the period 2023–2024.

<sup>4</sup> A final report on monitoring the implementation of the Operational Plan for the Prevention of Corruption in Areas of Special Risk with a presentation of the status of fulfillment of all measures, implementation of all activities, and recommendations for further action in connection with future strategic documents in this area is available at [https://www.acas.rs/cyr/page\\_with\\_sidebar/nadzor\\_pracenje#](https://www.acas.rs/cyr/page_with_sidebar/nadzor_pracenje#)



In 2023, the Agency actively contributed to the work of the Network for the Suppression of Irregularities and Frauds in the Handling of European Union Funds, headed by the Ministry of Finance. In accordance with the Strategic Plan for the Fight against Fraud and Management of Irregularities in the Disbursement of European Union Funds in the Republic of Serbia for the period 2021-2023. It also implemented all other activities that were envisaged in this plan for the year 2023.

In the process of its own strategic planning, the Agency relies on priorities in the field of European integration, so in 2023 it created a new Strategic Plan of the Agency for the period from 2023 to 2027, which was adopted in July 2023, as well as an Operational Plan for the implementation of the Agency's Strategic Plan for the period from 2023 to 2027 and monitored its implementation on the quarterly level. Besides the Agency's key competences, the Operational Plan also included a segment on gender equality.

## INTERNATIONAL COOPERATION

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

The Agency has continued to submit reports on the results and challenges it encounters in its work, and for the purpose of the preparation of 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 the public administration reform; on the implementation of the Stabilization and Association Agreement (SAA) through the implementation body - the SAA Committee, the Subcommittee for Justice, Freedom and Security and the Special Group for Public Administration Reform.

A contributing paper on the evaluation of the results of judicial reform in the Western Balkans (Dashboard Western Balkans) was prepared for the European Commission for the Efficiency of Justice (CEPEJ) within the Council of Europe for the year 2022.

As part of the Fourth Evaluation Round of the Council of Europe's Group of States against Corruption (GRECO), that is about preventing corruption among parliamentarians, judges, and prosecutors, the Agency worked with the Prime Minister's Office and the Ministry of Justice to ensure that the country's government institutions were following international standards. The 95<sup>th</sup> Plenary Session of the Group of States against Corruption of the Council of Europe (GRECO) in December 2023 adopted and published the Addendum to the Second Compliance Report on December 8, 2023, marking the completion of Serbia's compliance procedure with GRECO's

recommendations for the Fourth Round of Evaluation. The report states that the Republic of Serbia has fully fulfilled ten out of the 13 recommendations, and has partially fulfilled three others. The recommendations related, among others, to the transparency of the legislative process, the code of conduct of deputies, the selection and position of judges and prosecutors, the change in the composition and method of selection of the High Judicial Council and the High Council of the Prosecution, as well as the position and competences of the Agency.

Within the framework of the Fifth Round of Evaluation, which refers to the prevention of corruption and the improvement of integrity in the central bodies of state administration - the highest executive functions and law enforcement agencies, the report was prepared on the implementation of the recommendations from the Fifth Round of Evaluation for the Republic of Serbia, which are under the jurisdiction of the Agency, and submitted to the Ministry of Justice for further jurisdiction.

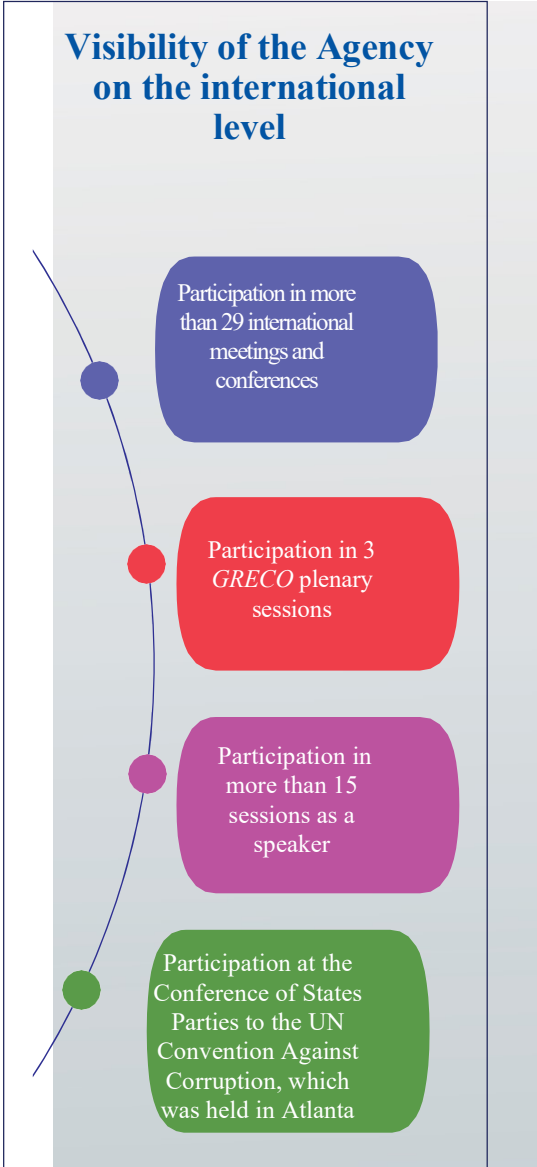
During the past year, the representatives of the Agency participated in all plenary sessions of GRECO, as part of the Delegation of the Republic of Serbia, while the representative of the Agency was a member of the GRECO evaluation team for Azerbaijan in the Fifth Round of Evaluation and a rapporteur for Cyprus and Portugal in the Fourth Round of Evaluation.

In 2023, the Agency participated in two plenary sessions within the Network of Institutions for the Prevention of Corruption (NCPA), which has 32 members, five partner- and two observer-institutions.

After becoming a member of the European network of institutions with registers of lobbyists (ELRN) in 2021, last year the Agency participated in the plenary sessions of this initiative.

When it comes to reporting on the implementation of the UN Convention against Corruption (UNCAC), in addition to the work on the development of annexes for the preparation of the report of the Republic of Serbia on the implementation of this convention, representatives of the Agency participated and made a significant contribution at the meeting as part of the evaluator's visit to the Republic of Serbia, as part of the second review cycle of compliance with the United Nations Convention against Corruption.

Participation at the 10<sup>th</sup> session of the Conference of States Parties to the UN Convention against Corruption, which was held in Atlanta, USA, from November 11 until December 15, 2023



where the representative of the Agency, at the side event "Experiences and challenges in measuring corruption based on a scientific approach," presented the Methodology for evaluating the effects of the Law on Prevention of Corruption.

The Organization for Economic Co-operation and Development (OECD) prepared and submitted a contribution for the Review of Competitiveness of Southeast Europe based on the data collected from competent institutions, designating the Agency as the coordinator of the anti-corruption dimension.

The most significant participation of the Agency's representatives at 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 OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR), Council of Europe, Regional Anti-Corruption Initiative (RAI), Organization for Economic Cooperation and Development (OECD), as well as bilateral partners.

In addition to improving existing collaboration with numerous institutions for preventing and fighting corruption on a bilateral level, the Agency established communication and cooperation with new anti-corruption institutions in 2023. Study visits to the Agency by representatives of the delegation of the State Commission for the Prevention of

Corruption of the Republic of North Macedonia as part of the Mobile Scheme program, the Regional School for Public Administration - ReSPA, and the Special Investigation Service of Lithuania were successfully implemented.

In collaboration with UNODC and RAI, the Agency actively participated in the implementation of the Regional Anti-Corruption and Illicit Finance Roadmap last year, and it presented the results of its work at the international meeting in Budva.

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

The capacities of the Agency were strengthened through international donor assistance, both in the implementation of entrusted competences and in the domain of developing the skills of employees.

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

Within 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 being implemented by a consortium composed of the German Organization for International Cooperation (GIZ), the Austrian Development Agency (ADA), the Central Agency for Project Management of Lithuania (CPMA) and OSCE, cooperation activities started with the Special Investigation Service of Lithuania. A study visit of Agency employees to the Special Investigation Service of Lithuania was carried out, as well as three four-day missions of representatives of the Special Investigation Service of Lithuania were organized - the first on the topic of recommendations for the preparation of the Agency's strategic document, the second on the topic of recommendations for the preparation of a communication strategy, and the third on the topic of youth education and raising awareness of the harmful nature of corruption. An analysis of training needs was carried out in cooperation with the Austrian Development Agency and the International Anti-corruption Academy, and the report "Analysis of training needs of the Agency for the Prevention of Corruption" was prepared. Trainings for Agency employees on "Financial Investigations" and "Corruption Risk Assessment" were carried out.

The OSCE Mission in Serbia provided significant support to the Agency, among other things, in the field of improving the Agency's visibility through translations into English for the Agency's website. Moreover, through support in holding a workshop for the development of the Agency's new Strategic Plan for the period 2023 to 2027, the organization of an international conference on the occasion of December 9, the International Anti-Corruption Day, as well as in the field of employee training for speech writing and support in the preparation of the Second Evaluation Report on the fulfillment of gender-responsive indicators, in accordance with the previously prepared Manual for the introduction of a gender perspective, measuring progress and improving gender equality through the Agency's activities.

Cooperation with the International Foundation for Electoral Systems (IFES) also continued successfully. An online training module on the implementation of the Law on the Financing of Political Activities and the Manual for the Implementation of the Law on the Financing of Political Activities was developed, and training was held for employees of the Sector for the Control of Financing of Political Activities and Campaigns on the topic of monitoring advertising in the digital space.

The Agency is also involved in the Council of Europe Project “Prevention of Money Laundering and Financing of Terrorism in Serbia”, with the support of the Swedish Agency for International Cooperation and Development (SIDA). In 2023, among other things, two events were held: "Training on reporting suspicious transactions" for representatives of the Agency for the



Prevention of Corruption and the workshop "Inter-institutional cooperation between prosecutor's offices and the Agency for the Prevention of Corruption."

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 IPA funds and other development aid for the sectors of justice, internal affairs and public administration reform, as well as in the preparation of accompanying documents

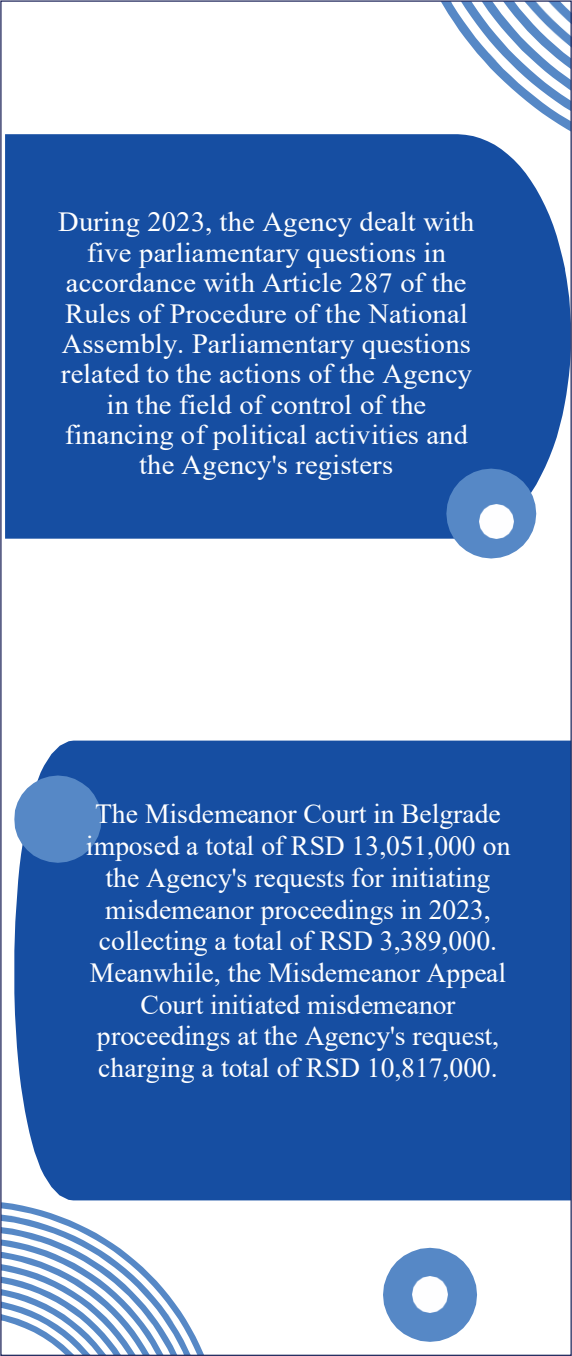
## COOPERATION WITH OTHER STATE AUTHORITIES

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

It is necessary in order to collect and exchange information, ensure verification and analysis of certain data, and also to ensure the timely and efficient prosecution of perpetrators of misdemeanors and criminal acts in the field of corruption. The exchange of knowledge, experiences, and good practices is a pillar of building effective partnerships.

In 2023, the Agency concluded a series of agreements and memoranda on cooperation with other state bodies and public institutions, namely:

- Agreement with the Human resources management service - Memorandum on Cooperation with the aim of establishing long-term cooperation that will contribute to the development and improvement of the work of both institutions. The goals of cooperation will be achieved, first of all, through the analysis of the application of positive regulations in areas particularly risky for the emergence of corruption, which relate to employment in the public sector, as well as pointing out the potential risks of corruption in that area, then through the organization of trainings for the employees of the Agency, newly appointed public officials in public authorities, as well as the planning of attracting staff to work in the Agency and other activities.



During 2023, 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 the field of control of the financing of political activities and the Agency's registers

The Misdemeanor Court in Belgrade imposed a total of RSD 13,051,000 on the Agency's requests for initiating misdemeanor proceedings in 2023, collecting a total of RSD 3,389,000. Meanwhile, the Misdemeanor Appeal Court initiated misdemeanor proceedings at the Agency's request, charging a total of RSD 10,817,000.



## Signed agreements and memoranda with:

- National Bank of Serbia
- Republic Geodetic Authority
- Serbian Business Registers Agency
- Faculty of Law, University of Belgrade
- Ministry of Foreign Affairs
- Administration for the Prevention of Money Laundering
- Council for the fight against corruption
- Belgrade Institute of Comparative Law
- Human resources management service
- Innovative center of the Faculty of Security in Belgrade



- Agreement with the Institute of Comparative Law for the purpose of establishing scientific and professional cooperation in connection with the study and analytical work of finding the best solutions in the field of corruption prevention in order to consistently respect the principles of the rule of law.
- Memorandum with the Anti-Corruption Council, which, among other things, is aimed at building a system of permanent mutual cooperation through the establishment of a proactive approach to preventing corruption in areas of special risk for the emergence of corruption, provided for in the strategic documents of the Republic of Serbia, for the purpose of effective implementation and control implementation of positive regulations in the mentioned areas according to the highest international standards and in accordance with the regulations. The Group of States against Corruption of the Council of Europe (GRECO) recommended it during the Fifth Round of Evaluation for the Republic of Serbia, which led to its signing on October 13, 2023.
- Agreement on cooperation with the Administration for the Prevention of Money Laundering, aimed at strengthening professional and business-technical cooperation in the fields of corruption prevention, money mapping, and terrorist financing. The previous cooperation has already been assessed as extremely successful, and the new Agreement will open opportunities for its deepening.
- Memorandum of Understanding between the Ministry of Foreign Affairs and the Agency for the Prevention of Corruption, which, among other things, aims to improve the efficiency of the procedure for declaring the assets and income of ambassadors and consuls general.
- Agreement on downloading data with the Serbian Business Registers Agency, which in the coming period will enable regular download of data on business entities, related parties, and real owners from the Serbian Business Registers Agency, for the purposes of performing tasks in the field of corruption prevention.



- Agreement on cooperation with the Republic Geodetic Authority for the more efficient implementation of tasks under their jurisdiction established by law as a simplification and facilitation of the process of reporting real estate to the Agency.
- Agreement on cooperation with the Faculty of Law in Belgrade, taking into account the competences of the Agency for the Prevention of Corruption, prescribed by the Laws on the Prevention of Corruption, on the Financing of Political Activities, and on Lobbying, and, at the same time, taking into account the social importance of the Faculty of Law of the University of Belgrade.
- Agreement on cooperation between the Agency for the Prevention of Corruption and the Innovation Center of the Faculty of Security, University of Belgrade. The agreement establishes scientific and professional cooperation in the field of corruption research and the fight against corruption and ensures the support of the Innovation Center to the Agency, through the analysis of research results and the development of innovative solutions, methods, techniques, software, products, processes, and services in security systems.
- Agreement on cooperation with the National Bank of Serbia for the purpose of electronic exchange of data from the registers maintained by the National Bank of Serbia. The Agency will be able to download data from the Single Register of Accounts, the Single Register of Safe-deposit Boxes, the Single Register of Money Remittance Beneficiaries, and the Register of Virtual Currency Service Providers, which it needs for the investigations it carries out in accordance with the Law on Prevention of Corruption.

## COOPERATION WITH CIVIL SOCIETY ORGANIZATIONS

The role of civil society in modern democracies is to supervise and control public authorities and public officials, which contributes to increasing the responsibility and transparency of their work. By participating in public life in this way, by giving initiatives and recommendations, and by implementing project activities, civil society represents one of the most important actors in the prevention of corruption and allies of the Agency in its activities in this field.

In 2023, the project "Analysis of the risk of corruption in the regulations of local self-government units" received financial support in the amount of RSD 2,000,000.

For the first time since the beginning of the implementation of the Law on Prevention of Corruption, the specific goal of the public competition for the allocation of funds to civil society organizations focused on the analysis of corruption risks in regulations and general acts adopted by local self-government units.

At the 15<sup>th</sup> public competition, according to pre-established criteria and standards, a Decision was made on the allocation of funds to the Transparency Serbia project. The importance of this project is reflected in the fact that analyses of several of the most important categories of acts in 28 cities will be made, among them the Rules of Procedure of the Assembly and acts on public hearings, based on which recommendations will be formulated to eliminate the risk of corruption. The aforementioned recommendations will not only be useful to the cities whose acts are analyzed but also to all other local self-government units that will be able to implement the recommendations



themselves.



## Consultative meetings with civil society organizations

During 2023, two consultative meetings with civil society organizations were held. An educational meeting was held in Užice on the topic of financing political activities and assessing the risk of corruption in regulations adopted by local self-government units. In addition to representatives of the civil sector and the media, employees of the city administration and members of political parties from the Užice district also attended.

The second meeting, entitled "Incompatibility of Functions and Conflict of Interests - action of the Agency for the Prevention of Corruption in cases of violation of the law" was held in a digital format for representatives of the media and civil society, and legal practice in this area was presented at it.

## Two monitoring visits were carried out

In accordance with the Rulebook on conducting a public competition for the allocation of CSO funds for the implementation of projects in the field of corruption prevention, the Agency also conducted two monitoring visits in order to supervise the implementation of projects financed by it.

The first visit was the supervision of the project "Citizens in action for the integration of gender-responsive and non-discrimination measures into the mechanisms for preventing corruption at the local level," carried out by the Užice Center for Human Rights and Democracy.

The second monitoring visit was held with representatives of the Bečej Youth Association, which implemented the project "Decisions tailored to citizens." The findings of the monitoring of both visits and recommendations were submitted to the associations so that they could implement the project activities more efficiently.

## Performed supervision over the implementation of project activities

The agency regularly monitored the implementation of three projects that were allocated financial



resources and that implemented their activities during 2023: "Support to local self-government units in drafting local anti-corruption policies and increasing transparency" implemented by Transparency Serbia, "Citizens in action for the integration of gender-responsive and non-discrimination measures into the mechanisms for preventing corruption at the local level" of the Užice Center for Human Rights and Democracy, and the project "Decisions tailored to citizens" of the Bečej Youth Association. Upon completion of each of the mentioned projects, and based on the submitted narrative, financial, and audit reports of CSOs, final reports on the realized financial support for the projects were prepared and posted on the Agency's website to be available to the public.

## **Conducted research on the possibilities of improving cooperation**

In order to maintain the continuity of communication with CSOs, a questionnaire was created with the aim of collecting proposals from CSOs on the possibilities of deepening and improving cooperation in the coming period. The questionnaire was distributed electronically to the addresses of 32 CSOs active in the field of corruption prevention. Based on the answers received and analyzed, a report was written, and recommendations were formulated that will be implemented in the following period (see recommendations).

### **A characteristic example**

The projects that the Agency financially supported in the previous year were mainly aimed at providing support to local self-government units in the implementation of anti-corruption mechanisms in order to improve the transparency and responsibility of their work. Civil society organizations were mainly involved in providing assistance to local self-government units during the preparation of the local anti-corruption plan (LAP), the formation of bodies to monitor the implementation of the LAP, or the preparation of acts of the local self-government units provided for by the LAP. This form of assistance undeniably enabled many cities and municipalities to improve their work; however, at the same time, it raised several questions, among others, about whether there are administrative capacities of local self-government units to absorb knowledge related to the creation and implementation of public policies and how much sustainable knowledge transfer occurs.

# RAISING PUBLIC AWARENESS

(CONFERENCES, DEBATES, MEDIA PERFORMANCES)



## The week marking the International Anti-Corruption Day

Under the slogan "For Serbia without Corruption", with series of events in several cities in the Republic of Serbia, from December 9 to 16, 2023, the Agency organized the Anti-Corruption Week.

In this way, the Agency celebrated December 9, the International Anti-Corruption Day, which was established by the United Nations Convention against Corruption.

Moreover, the manifestation with which the Agency marked this significant date was dedicated to young people and their education, as a prerequisite for strengthening general social integrity.





The week of the fight against corruption began with the Formal Academy, which was held on December 9 in the House of the National Assembly, and continued with the International Conference entitled "Education of young people in the function of preventing corruption: the path to strengthening social integrity", which was held on December 11 in the hotel "Metropol" in Belgrade.

We continued the week in the dialogue with young people at forums entitled "Education of young people in the function of preventing corruption" at the Faculty of Law in Belgrade, the University of Niš, the Faculty of Economics in Kragujevac and the Faculty of Law in Novi Sad.

In a symbolic way, on December 16, the event program ended with the chess tournament "CHECKMATE to corruption" organized by the Agency and the Belgrade Chess Association. The Director of the Agency Dejan Damnjanović and President of the Belgrade Chess Association Andrija Jorgić opened the tournament and played the first move.

### Public Relations

On March 21, 2023, a forum was held in the premises of the Užice City Assembly on the competences of the Agency for representatives of local self-governments, civil society organizations and the media. The training was devoted to the implementation of the Law on the Financing of Political Activities and Obligations of Political Entities, addressed issues of possible sources

## Media activities



23

Statements and interviews in print media



Tanjug, Novosti, Politika, Kurir, Blic, Informer and others regularly published the Agency's announcements

5<sup>↑</sup>

Guest appearances on television



92

Posts on the Agency's social networks

and ways of financing political activities, and presented the Agency's actions in cases of violations of the law, and in the second part of the training, entitled "Risk Assessment from corruption in local self-government regulations", were present with the presentation of the part of the Methodology for the Corruption Proofing in the Regulations, familiar with the competences of the Agency in this area. The training was also attended by representatives of the local media and the civil sector.



On June 15, 2023, the Agency held an online workshop with representatives of civil society and the media, where it introduced the participants to the legal competences, powers, and practices in determining the incompatibility of functions and conflicts of interest of public officials. They discussed the course of the procedure that, upon application or ex officio, the Agency conducts in order to determine the existence of a conflict of interest. The goal was to additionally clarify the key legal provisions in this area to representatives of civil society and journalists, who are extremely important in revealing the performance of several public functions for which the Agency's consent was not sought. This workshop was monitored and actively participated in by representatives of civil society organizations Transparency Serbia from Belgrade, the Bečej Youth Association, the Užice Center for Human Rights and Democracy, the Citizens' Association DOMMBIG from Medveđa, CINS, as well as a journalist from Večernje Novosti.

### **Journalistic questions**

During 2023, 85 journalistic questions 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 public functions were answered. During the 2023 election campaign, a large number of questions related to the financing of political entities were also raised.

### **Media activities**

From the media activities, 5 TV appearances were made, 20 statements and 3 interviews with the Agency's Director were given in print media.

All business meetings (35) and signed Cooperation Agreements (11) were regularly published by the media (Tanjug, Novosti, Politika, Kurir, Blic, Informer and others). All activities were published on the Agency's social networks (92 posts), and the Director's business profile was also opened (43 posts).

### **Information Booklet on the Work about the work of the Agency**

Obligations have been consistently monitored, and the informant on the Agency's work has been updated during 2023. The main part of the update for the Information Booklet on the Work was regarding the application of the new Rulebook on the internal organization and systematization of work positions in the Agency.



# WORK REPORT OF THE COUNCIL

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The Council gave a positive opinion that the Director of the Agency can adopt the Rulebook on the internal organization and systematization of work positions in the Service of the Agency, according to the text of the draft of the aforementioned rulebook number 014-110-00-0002/23-01 from July 2023.

In response to the request of the Director of the Agency for a principled stance on whether the president and members of temporary bodies of local self-government units must submit reports on assets and income to the Agency under the terms of Articles 68 and 69 of the Law, the Council adopted the following stance:

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**„Considering that the temporary body of the local self-government unit, until the constitution of the Assembly and the election of the executive bodies of the local self-government unit, performs current and urgent tasks within the competence of the Assembly and the executive bodies of the local self-government unit in the sense of the provisions of Article 86, paragraph 4 of the Law on Local Self-Government ("Official Gazette of the Republic of Serbia", no. 129/07, 83/14 - other law, 101/16 - other law, 47/18 and 111/21 - other law), and that councilors and members of the municipal council, based on the provisions of Article 70, paragraph 1 of the Law, exempted from the obligation to report assets and income regularly and extraordinary to the president and members of temporary bodies, if they previously held the public office of councilor, i.e. member of the municipal or city council, the obligation of regular and extraordinary reporting of assets and income does not apply."**

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During 2023, the Council held ten regular and three telephone sessions. At the regular sessions, the Council decided on 36 appeals, and of these, 30 appeals were rejected as unfounded, one appeal was dismissed as irregular, and in five cases, the first instance decisions were annulled.

Regarding annulled first instance decisions, in two cases we are talking about appeals proceedings in which the Board<sup>5</sup> has already decided on appeals, but administrative disputes were initiated against the Board's decisions. The Administrative Court accepted the lawsuits of public officials and, in judgments from 2023, annulled the decisions of the Board, and remanded them for repeated procedure upon appeal. In the renewed proceedings, the Council annulled the first-instance decision from 2017 and suspended the proceedings due to the



statute of limitations, while in the second proceeding, it annulled the first-instance decision from 2020 and the proceedings were suspended due to the application of the Authentic Interpretation of the provision of Article 2 paragraph 1 point 3 of the Law on Prevention of Corruption which the National Assembly of the Republic of Serbia adopted on February 11, 2021. In the remaining three cases, the annulment of the first-instance decisions occurred due to incorrectly established facts regarding the timeliness of the public official's complaint, due to a violation of the rules of procedure in connection with personal delivery, and in one case the Council, appreciating all established facts and relevant provisions of the law and others regulations, found that in the specific case there is no obstacle for the public official to perform another job at the same time, for which reason the first-instance decision was annulled, which rejected the public official's request for consent to perform another job.

In 2023, The Administrative Court submitted for response 12 appeals that were filed to annul the Council's decisions made in the appeal procedure, while another 49 administrative disputes are pending based on appeals filed in previous years. In 2023, the Administrative Court issued 25 judgments. 23 appeals were rejected, while two appeals were accepted.

<b>Decisions of the Administrative Court submitted in 2023</b>	<b>Number</b>
Rejected appeals	23
Accepted appeals	2
<b>Total</b>	<b>25</b>

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5 Until the day of the implementation of the Law on the 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 the Agency's second-instance body.

# CORRUPTION RESEARCH

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The importance of researching the nature and manifestations of corruption, as well as the measures that need to be taken to reduce it, is not only to improve our understanding of how it works in different environments but also to provide a basis for improving effectiveness. Research on the nature and manifestations of corruption, along with the necessary measures to reduce it, is crucial for enhancing the effectiveness of anti-corruption public policies and strategies.

The University of Novi Sad conducted a survey in 2023 to gauge students' perceptions of corruption.

With this research, the cycle of surveying the opinions of students at four university centers has been completed. This series of research began with students at the University of Belgrade in 2021, while in 2022, the survey of students at the Universities of Niš and Kragujevac continued.

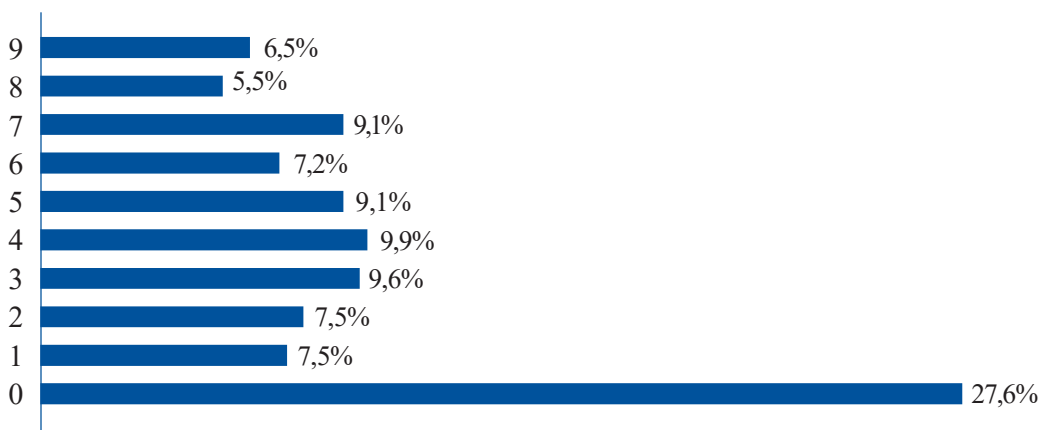
The primary goal of the survey was to measure the level of familiarity of the students of the University of Novi Sad with the phenomenon of corruption in general, the degree and scope of their perception of the existence of corruption at those universities and faculties, and their specific observations about possible directions and aspects of continuous action to prevent corruption in higher education

The survey included 416 students of the Faculty of Medicine, Law, Philosophy, and Technical Sciences, taking into account the need of all scientific fields: social studies and humanities, medical sciences, technical and technological sciences, and natural and mathematical sciences. The original plan, which aimed to include the field of natural and mathematical sciences through the participation of students from the Faculty of Natural Sciences, did not materialize. In December 2023, four presentations of the report on the study of students' perceptions of corruption at state universities in Serbia were held.

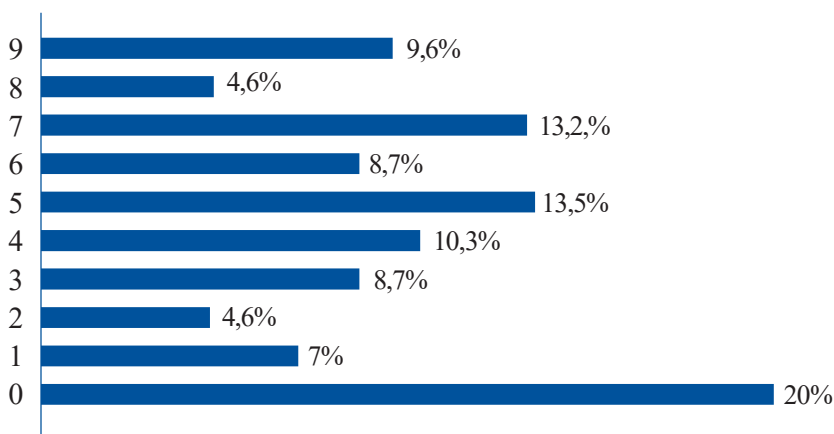
Based on the results on the survey the students of the University of Novi Sad, among other things, showed that the majority of respondents - 27.6% believe that corruption is not present at their Faculty; 25% think that corruption is present to a lesser extent (measured by the range of grades from 1 to 3), and 26.2% that it is present, but not widespread (range of grades from 4 to 6); 21.2% of students (range of grades 7 to 9) believe that corruption at the University is very widespread and expressed. The structure of the distribution of answers shows that the students of the University of Novi Sad are segmented into four almost equal groups, which makes the aggregate attitude regarding this issue value-neutral. On the other hand, when it comes to the existence and prevalence of corruption at the University as a whole, the aggregate attitude shows a slight tendency to "lean" in favor of the existence and prevalence of corruption. Thus, 20% of students believe that there is no corruption at the University at all, and 20.2% that it is present to a small extent (range of grades from 1 to 3); 32.5% think that there is corruption, but it is not widespread to a significant extent (range of grades 4 to 6), while 27.4% think that corruption is widespread and very evident (range of grades 7 to 9).



### Is corruption present at your Faculty and to what extent?



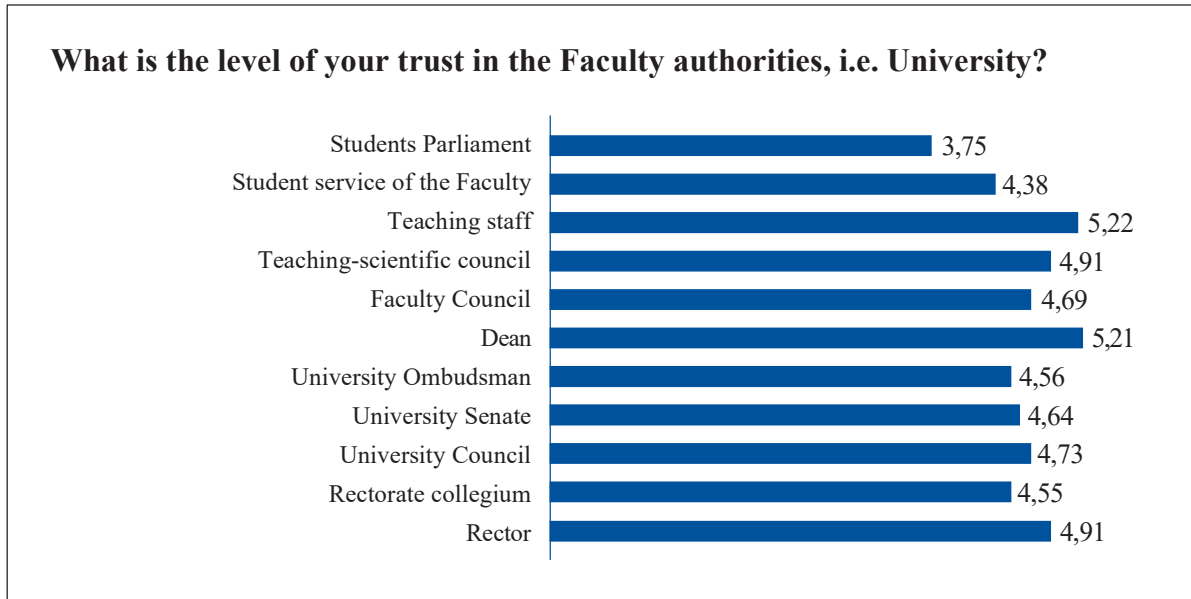
### Is corruption present at your University and to what extent?



The difference in the responses regarding the perception of corruption at the faculties in relation to the University as a whole could be explained by the presence of a certain measure of reticence among the respondents to express their real opinion when it comes to the faculty, because it is an environment whose bodies make decisions from which the direct realization of students' interests depends. On the other hand, given that their rights and obligations do not directly depend on the decisions of the University's authorities, there is no need for restraint in expressing their views.

The level of trust of the students in the authorities of the faculty, i.e. the University, as in previous situations, is mostly uniform, with the most common value of the average grade around 4.5

(the range of grades from 0 to 9). The only deviation refers to the noticeably lower level of students' confidence in their own representative body.



The majority of surveyed students - 51.4% of them would report corrupt behavior at their Faculty in the future, while 25.7% answered that they would not report such behavior in the future either. 61.1% of those who said they would report corrupt practices indicated that they would submit a report to the Agency.

In accordance with the criteria from the Methodology for evaluating the effects of the Law on the Prevention of Corruption, the categories of methodological thematic areas were harmonized and adapted to the competences of the Agency. Data on the results of activities within all thematic areas within the prescribed scope of work of the Agency are organized in the format of a unique electronic table, which is functionally adapted for data entry and automatic processing. According to the defined parameters, data for 2021 and 2022 were collected and entered into the table from all competent sectors of the Agency, while data collection for 2023 began at the end of the year.

Moreover, coordination meetings were held with representatives of the UN Office on Drugs and Crime (UNODC) and public opinion research agencies, which will be engaged to conduct surveys on the topic of the perceptions and attitudes of three target groups (citizens and employees in the public and private sectors) on the gender aspects of the phenomenon of corruption. For the purposes of applying the Methodology, the Agency has developed its own "cluster" of questions that will be incorporated into the questionnaire for the aforementioned survey of perceptions, that is, the attitudes of citizens.



## **Instrument or questionnaire for examining the need for the introduction of a modified anti-corruption mechanism in local self-government**

Measure 3.2.1.2. The Operational Plan for the Prevention of Corruption in Areas of Special Risk of the Government of the Republic of Serbia from September 2021 envisages the creation of an analysis of the content of the integrity plan model for the local self-government system and the local anti-corruption plan model as the two most important preventive mechanisms encountered at the local level. According to the requirements of the Operational Plan, the analysis was supposed to provide clear findings on the risk areas, processes and measures that overlap in these documents and, in the end, to propose ways to optimize and improve the content of planning documents to prevent corruption in local self-government units.

The Operational Plan adopted one of the recommendations for optimizing the content of planning documents, which suggests conducting research to examine whether there are needs and reasons to modify the existing anti-corruption mechanisms at the local level. An assessment of needs should include all relevant stakeholders.

In order to implement the recommendation, two questionnaires intended for employees in local self-government units and civil society organizations were prepared, which will be used to examine the needs related to the modified or additional anti-corruption mechanism.

# STRENGTHENING THE CAPACITY OF THE AGENCY

## Staffing and technical capacities of the Agency

As of December 31, 2023, the Professional Service of the Agency employed 92 persons out of a total of planned 162 for by the Rulebook on Internal Organization and Systematization of Work Positions, which means that 56.79% of the job positions are filled.

Strategic and operational planning of human resources and forecasting of future requirements in the area of knowledge and skills of employees, arising from the competences of the Agency were practically realized through the implementation of training for all employees in accordance with the Program of professional development and additional education for the year 2023, through 53 trainings organized by the National Academy for Public Administration and 12 trainings organized by domestic and international partners. The total number of employees in the Agency who underwent training in connection with the implementation of the Law on Prevention of Corruption in the reporting period is 119, from which it follows that 2/3 of the employees attended training in connection with the implementation of the Law on Prevention of Corruption, noting that in certain trainings the same employees participated, depending on the topic and organizational unit of the Agency, to which the topic refers.

In addition to above mentioned training, the employees of the Agency also participated in various other activities, such as workshops, round tables, but also in the following activities:

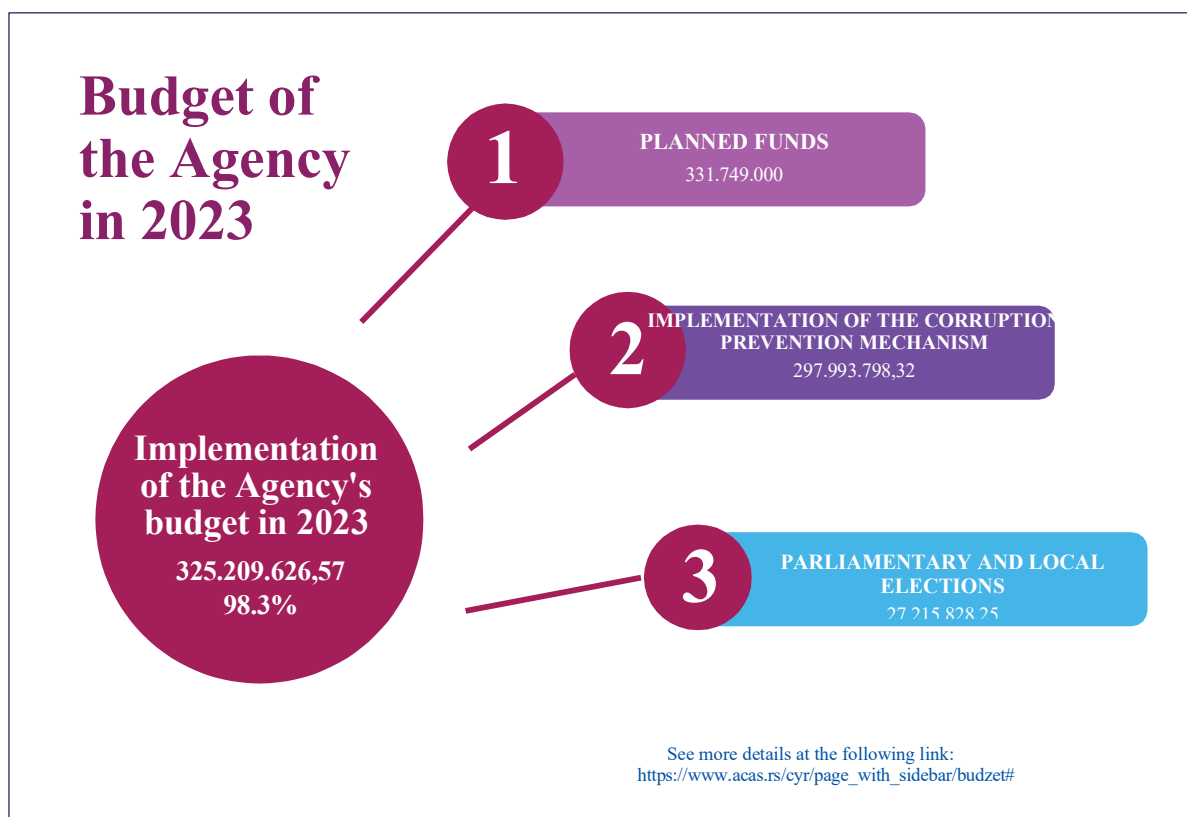
- Nine representatives of the Agency were on a study visit to Lithuania, organized as part of the Project "Support for Strengthening the Rule of Law in the Republic of Serbia" (EU for the Fight against Corruption and Fundamental Rights). The topics discussed related to corruption risk assessment, corruption risk assessment in regulations, integrity, analytical tools, strengthening awareness of the harmfulness of corruption, coordination and monitoring of the implementation of anti-corruption measures, conflict of interest, and lobbying;
- Within the same project, three expert missions of the Special Investigation Service of Lithuania were held, which dealt with the topics of strategic planning, communication, defining recommendations for the development of the Agency's new Strategic Plan, recommendations for the development of the communication segment of the Agency's new Strategic Plan, as well as youth education;
- Within the project "Strengthening the professional capacities of appointed civil servants in Serbia (IPA-19)", in the reporting period, three representatives of the Agency were members of the delegation of the study visit to the institutions of the European Union in Brussels organized by the National Academy for Public Administration (during May and December 2023);
- Thanks to the support of the US Department of Justice, one employee of the Agency became



a certified fraud investigator.



## Material and technical capacities of the Agency



The total budget of the Agency in 2023 was RSD 331,749,000 of which RSD 304,149,000 are for regular activities of the Agency, and RSD 27,600,000 for a project intended to monitor the campaigns of political entities for parliamentary and local elections.<sup>6</sup>

Planned funds for salaries, benefits and social benefits for employees amounted to RSD 232,310,000 which represents 70.02% of the total amount.

The total implementation of the Agency's budget in 2023 was RSD 325,209,626.57, which is 98.03% of the total approved funds. Unspent funds were returned to the budget of the Republic of Serbia.

In 2023, the following was completed:

- The office space was arranged and equipped;
- The offices on the first floor were renovated;
- The conditions for the work of regional offices in Niš, Kragujevac, and Novi Sad have been ensured.

During 2023, all public procurement procedures were carried out in a timely manner, and the necessary procurement contracts were concluded. Contracts are executed in accordance with the agreed-upon dynamics.

<sup>6</sup> You can see more details about the Agency's financial plan and budget execution on the Agency's website: [https://www.acas.rs/cyr/page\\_with\\_sidebar/budzet](https://www.acas.rs/cyr/page_with_sidebar/budzet)



**AGENCY FOR THE PREVENTION OF CORRUPTION  
RECORDS OF PUBLIC PROCUREMENTS FOR 2023**

No.	Subject of public procurement	Type of procedure	Supplier	Contract value without VAT	Contract value with VAT	Realization with VAT
1.	Maintenance of the accounting software <i>NextBIZ</i>	Open public procurement procedure	„Bit Impeks” d.o.o, Belgrade	366.000,00	439.200,00	366.000,00
2.	<i>CheckPoint</i> software licenses	Open public procurement procedure	„Magnetic System” d.o.o, Belgrade	4.155.842,00	4.987.010,40	4.987.010,40
3.	Maintenance of internal portal and server infrastructure	Open public procurement procedure	„Extreme” d.o.o, Belgrade	915.000,00	1.098.000,00	486.681,60
4.	IT system support	Open public procurement procedure	„Magnetic System” d.o.o, Belgrade	2.076.000,00	2.491.200,00	1.426.412,90
5.	<i>eDocumentus</i> system maintenance	Open public procurement procedure	„Prozone” d.o.o, Novi Sad	5.349.600,00	6.419.520,00	1.604.880,00
6.	Service of travel agencies	Open public procurement procedure	„Royal Tours” d.o.o, Belgrade	3.000.000,00	3.600.000,00	0,00
7.	Software Licenses - licenses for <i>Backup</i> and replication	Open public procurement procedure	„Magnetic System” d.o.o, Belgrade	791.620,00	949.944,00	949.944,00
8.	Software licenses - other licenses	Open public procurement procedure	„Extreme” d.o.o, Belgrade	832.352,00	998.822,40	998.822,40
9.	Fuels and lubricants	Centralized public procurement in 2022	„NIS” a.d, Novi Sad	500.000,00	600.000,00	518.982,61
10.	FTO services	Centralized public procurement in 2022	„Dobergard” d.o.o, Belgrade	1.993.968,00	2.392.761,60	2.392.761,60
11.	FTO services	Centralized public procurement in 2023	„Dobergard Plus” d.o.o, Belgrade	5.853.120,00	7.023.744,00	1.177.056,00
12.	Toners for <i>HP</i> devices	Centralized public procurement in 2021	„Perihard Inženjering” d.o.o, Belgrade	268.345,00	322.014,00	84.968,40
13.	Toners for <i>HP</i> devices	Centralized public procurement in 2022	„INTEC” d.o.o, Novi Sad	281.484,00	337.780,80	337.780,80

14.	<i>HP</i> printer maintenance	Centralized public procurement in 2021	„INTEC” d.o.o, Novi Sad	200.000,00	240.000,00	77.055,48
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**AGENCY FOR THE PREVENTION OF CORRUPTION  
RECORDS OF PUBLIC PROCUREMENTS FOR 2023**

No.	Subject of public procurement	Type of procedure	Supplier	Contract value without VAT	Contract value with VAT	Realization with VAT
15.	Toners for CANON devices	Centralized public procurement in 2022	„PROINTER-WEB” d.o.o, Belgrade	50.220,00	60.264,00	60.264,00
16.	Mobile telephony	Centralized public procurement in 2022	Telekom Srbija a.d, Belgrade	857.699,04	1.029.238,85	350.617,66
17.	Property insurance	Centralized public procurement in 2022	DDOR Novi Sad a.d.o, Novi Sad	624.786,00	656.025,30	656.025,30
18.	Employee insurance services - travel health. insurance	Centralized public procurement in 2022	„Generali osiguranje” a.d.o, Belgrade	499.144,80	500.052,30	486.538,80
19.	Vehicle insurance	Centralized public procurement in 2022	„Dunas osiguranje” a.d.o, Belgrade	206.248,00	216.560,40	138.680,10
<b>Σ</b>				<b>28.821.428,84</b>	<b>34.362.138,05</b>	<b>17.100.482,05</b>

## IT capacities of the Agency

In today's digital age, efficient and transparent administration is crucial for building citizens' trust and for the very functioning of the state. Analytics are used to identify areas for improvement and to monitor key performance indicators (KPIs) to ensure resources are used efficiently, to identify trends to better respond to Agency and public needs, to identify areas for improvement, to develop targeted programs and services, as well as to identify savings and optimize the budget.

In 2023, the following was completed:

- The level of IT security has been raised with significant savings;
- Additional application settings were made to prevent data leakage and control the IT system from the aspect of information security;
- Existing equipment has been upgraded and configured, which is now fully functional and able to support all requirements;
- The existing server for local data copy was upgraded and configured;
- The Act on the security of the Agency's ICT system was drafted;
- An "identity card" of the Agency's ICT system was created, which represents the basis for all planned activities on the establishment of a Disaster Recovery Location site, data migration from old to newly acquired data storage devices and migration of certain services to the infrastructure of the Office for Information Technologies and e -right;

- The website was improved both in terms of production and administration;
- Based on the agreement on improving cooperation and data exchange with the National Bank of Serbia and the Central Register of Mandatory Social Insurance concluded by the Director of the Agency, the reception and processing of data from the web services of the aforementioned authorities in the Agency's Unified Information System (eDocumentus) was enabled, which increased the efficiency of the work of organizational units that use this data;
- A connection was established with the newly opened regional units of the Agency in Novi Sad, Kragujevac, and Niš. The prepared, configured equipment at the new locations enables the employees to function in the same way as if they were located at the Agency's headquarters.





# GENDER PERSPECTIVE OF PREVENTING CORRUPTION

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

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

Control of conflicts of public and private interest and accumulation of offices	Total	Women	Men
The number of requests received for the performance of another function, notice about the performance of another job or activity (referring to membership in associations in this section and in all other sections that follow), and the establishment of an employment relationship or business cooperation after the termination of public office (pantouflage) in the reporting period	643	261	382
Number of requests to perform another function	340	120	220
Number of requests or notice for performing other work	291	135	156
Number of requests to establish an employment relationship or business cooperation after termination of office (pantouflage)	12	6	6
The total number of resolved requests of public officials for the performance of another function, the performance of another job or activity, and the establishment of an employment relationship or business cooperation after the termination of the public function in the reporting period	548	226	322
For another function	244	81	163
For performing another job or activity	292	140	152
Pantouflage	12	5	7
The number of decisions made in the reporting period, rejecting the request of a public official or notifying the official that the simultaneous performance of a public function and work endangers the impartial performance of a public function and obliges the official to stop performing that work.	46	17	29
For another function	35	13	22
For performing another job or activity	10	3	7
Pantouflage	1	1	0

The number of decisions made in the reporting period by which the request was rejected, a decision was made to suspend the procedure, or a notification was delivered that the Agency is not competent to make a decision on the request (resolved in another way)	54	29	25
For another function	54	29	25
The number of resolutions passed, in the reporting period, approving the public official's request	212	78	134
For another function	168	54	114
For performing another job or activity	39	22	17
Pantouflage	5	2	3
The number of decisions on the requests of public officials to perform another function, perform another job, or engage in another engage in another activity to establish an employment relationship or business cooperation after the termination of the public function that became final and enforceable in the reporting period	37	0	37
The number of officials who acted according to the Agency's decisions, rejecting the request for consent, and stopped performing another incompatible function, performing another job, or activity	35	0	35
The number of notices received about suspected conflicts among interest of public officials in the reporting period	32	21	11
The number of given opinions (notifications) about suspected conflicts of interest of public officials in the reporting period	32	21	11
The number of notices given in the reporting period by which the Agency established that the suspicion of a conflict of interest of a public official was justified and by which it was recommended that the public official refrain from acting or making decisions in a specific situation, i.e., another proposal was given to eliminate the conflict	25	15	10
<b>Control of the financing of political activities</b>	<b>Total</b>	<b>Women</b>	<b>Men</b>
The number of annual reports that were submitted on the financing of political subjects during the reporting period was	179	30	149
The number of annually verified (formal control of correctness) reports on the financing of political subjects during the reporting period	179	30	149
The number of content controls in annual reports on the financing of political subjects in the reporting period	31	9	22
The number of submitted requests for initiating misdemeanor proceedings against the political entity and the responsible person in the political entity for violation of the ZFPA, in connection with the petition of the annual financing report, in the reporting period is as follows:	88	11	77
Due to non-petition of the annual financing report	77	6	71
Due to non-use of 5% of funds from public sources for professional development and work with membership	6	3	3
Other injuries	5	2	3



The number of submitted requests for initiating misdemeanor proceedings against a political entity and a responsible person in a political entity due to violation of the ZFPA, in connection with the petition of reports on election campaign expenses, in the reporting period is as follows:	5	0	5
Due to the petition of incomplete final reports on the expenses of the election campaign	1	0	1
Other violations of the Law	4	0	4
The number of submitted requests for initiating misdemeanor proceedings against a legal entity, entrepreneur, responsible person in a legal entity and a natural person due to violation of the ZFPA, in the reporting period	1	1	0
Exceeding the allowed amount of contributions to a political entity	1	1	0
The number of received decisions/notifications on the outcomes of actions taken by competent authorities on criminal charges against persons for criminal offenses from the Law on Financing of Political Activities, in the reporting period.	1	0	1
Dismissed criminal charges	1	0	1
The number of distance learning participants in the reporting period	18	8	10
The number of participants in training for political subjects in the reporting period	112	46	66
Number of training participants for field observers in the reporting period	179	92	87
<b>Legal affairs and lobbying</b>	<b>Total</b>	<b>Women</b>	<b>Men</b>
The number of submitted requests for initiating misdemeanor proceedings, in the reporting period, against public officials for violations of the Law on the Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	143	56	87
The number of submitted requests for initiating misdemeanor proceedings, in the reporting period, against judges for violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	6	4	2
The number of submitted requests for initiating misdemeanor proceedings, in the reporting period, against holders of the highest executive functions due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	3	1	2
The number of decisions of the misdemeanor court, 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 the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	159	54	105
Agreement on recognition of violations	6	6	0
Convictions (reprimands and fines in total)	152	48	104
Reprimands	69	21	48



Fines	83	27	56
Suspensions or termination of proceedings	1	0	1
The number of decisions of the misdemeanor court, delivered in the reporting period, based on requests for initiating misdemeanor proceedings against judges due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME namely:	6	3	3
Agreement on recognition of violations	5	3	2
Convictions (reprimands and fines in total)	5	3	2
Reprimands	1	0	1
The number of misdemeanor court decisions, delivered in the reporting period, based on requests for initiating misdemeanor proceedings against holders of the highest executive positions due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	3	0	3
Convictions (reprimands and fines in total)	3	0	3
Fines	3	0	3
The number of submitted requests for initiating misdemeanor proceedings, in the reporting period, against public officials due to violations of the Law on Prevention of Corruption related to conflicts of interest	2	0	2
The number of misdemeanor court decisions, delivered in the reporting period, made based on requests for initiating misdemeanor proceedings against public officials for violations of the Law on Prevention of Corruption related to conflict of interest in the reporting period, namely:	15	5	10
Convictions (reprimands and fines in total)	15	5	10
Reprimands	6	2	4
Fines	9	3	6
The number of submitted requests for initiating 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	2	2	0
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 a responsible person in a public authority for violations of the Law on Prevention of Corruption related to the integrity plan, namely:	2	1	1
Convictions (reprimands and fines in total)	2	1	1
Reprimands	2	1	1
The number of submitted requests for initiating misdemeanor proceedings, in the reporting period, against a responsible person in a public authority for violations of the Law on Prevention of Corruption related to training in the field of prevention of corruption and strengthening of integrity	7	1	6

The number of misdemeanor court decisions, delivered in the reporting period, made based on a request for initiating 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:	2	0	2
Convictions (reprimands and fines in total)	2	0	2
Fines	2	0	2
The number of submitted requests for initiating 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 petition	2	0	2
The number of decisions of the misdemeanor court, delivered in the reporting period, made on the basis of requests to initiate misdemeanor proceedings against other persons due to failure to respond to the Agency's summons, failure to provide direct access to data and documents, failure to submit documents and information within the prescribed period, or after proceeding according to the petition, namely:	1	0	1
Convictions (reprimands and fines in total)	1	0	1
Reprimands	1	0	1
The number of criminal charges filed against public officials due to non-declaration of assets and income in order to conceal them, in the reporting period	9	4	5
The number of criminal charges filed against judges for non-declaration of assets and income in order to conceal them, in the reporting period	2	2	0
The number of received decisions/notices on the outcomes of actions by competent authorities on criminal charges against public officials in the reporting period	1	1	0
Dismissed criminal charges with the application of the principle of opportunity	1	1	0
The number of participants in trainings on the risks of corruption in regulations in the reporting period	61	41	20
Number of participants in trainings organized by the Agency	61	41	20
Number of participants in training sessions for lobbyists in the reporting period	18	8	10
Number of participants in lobbyist training	18	8	10
The number of training participants who obtained a certificate of completed training in the reporting period	17	8	9
The number of participants in training sessions for Agency employees in the reporting period	119	73	46
Number of participants in trainings organized by international organizations	47	29	18
The number of participants in trainings organized by National Academy of Public Administration (NAJU)	62	37	25
Number of participants in trainings organized by other authorities and organizations	10	7	3



<b>Registers, records and verification</b>	<b>Total</b>	<b>Women</b>	<b>Men</b>
The number of lobbyists registered in the Register of Lobbyists	5	2	3
The number of proceedings initiated against public officials, in the reporting period, due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME NAMELY:	175	76	99
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	88	35	53
Due to the delay in submitting the report (notification of unchanged status) in assets and income upon resuming public office	7	3	4
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	36	17	19
Due to non-reporting of significant changes in assets and income during the exercise of public office	31	17	14
Due to multiple violations of the law related to the obligations of the same public official to declare assets and income	13	4	9
The number of proceedings completed in the first instance, in the reporting period, against public officials for violation of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	186	76	110
The number of reprimands issued to public officials in the reporting period due to violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME NAMELY:	178	75	103
Due to the delay in submitting the report upon entering public office and due to the incorrect and incomplete report submitted upon entering public office	85	36	49
Due to the delay in submitting the report (notice of unchanged status) in assets and income upon resuming public office	10	6	4
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	38	17	21
Due to non-reporting of significant changes in assets and income during the exercise of public office	23	11	12
Due to several violations of the law related to the obligation of the same public official to declare assets and income	22	5	17
The number of reported appeals against the decisions of the Agency's first-instance body related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME	10	7	3
The number of proposals for submitting a request to initiate misdemeanor proceedings for violations of the Law on Prevention of Corruption related to the paragraph VI. GIFTS and paragraph VII. REGISTERING ASSETS AND INCOME, in the reporting period	126	47	79

The number of received decisions on the outcomes of misdemeanor court actions on requests to initiate misdemeanor proceedings against public officials, in the reporting period (for requests submitted until November 2023)	19	11	8
Convictions (reprimands and fines in total)	19	11	8
Reprimands	4	3	1
Fines	15	8	7
Number of proposals for filing criminal charges against public officials for failure to declare assets and income in order to conceal them in the reporting period	9	4	5
The number of criminal reports/reports against public officials due to non-reporting or providing false information about assets and income in order to conceal them, in the period for which the report is being made or suspected of committing another criminal offense for which they are prosecuted ex officio	2	0	2
The number of received decisions or notifications about the outcomes of actions by competent authorities on criminal charges or reports against public officials, in the reporting period	14	2	12
Convicted conditional sentences	1	0	1
Dismissed criminal charges with the application of the principle of opportunity	2	0	2
Evidentiary actions in progress	8	1	7
Dismissed criminal charges	3	1	2
<b>Integrity</b>	<b>Total</b>	<b>Women</b>	<b>Men</b>
The number of participants in ethics and integrity trainings in the reporting period	23	17	6
Number of participants in training organized by NAJU or other entities	23	17	6
Number of participants who completed distance training on ethics and integrity during the reporting period	34550	16138	18412
Number of ToT participants, in the reporting period	15	10	5
Number of training participants in the field of integrity plans, in the reporting period	318	174	144
Number of participants in trainings in the field of integrity plans organized by the Agency	29	15	14
Number of participants in trainings in the field of integrity plans organized by NAJU or other entities	289	159	130
Number of participants who completed remote training on integrity plans, during the reporting period	22	10	12



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