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РЕПУБЛИКА СРБИЈА
АГЕНЦИЈА ЗА
СПРЕЧАВАЊЕ
КОРУПЦИЈЕ

WORK REPORT

for 2021



Republic of Serbia



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for 2021

Belgrade, March 2022

Publication title:
WORK REPORT FOR 2021

Publisher:
**Anti-Corruption Agency,
Carice Milice 1
11000 Belgrade
Phone: 0114149100
www.acas.rs**

For the publisher:
Dragan Sikimić, Director

Print:
Birograf comp

Proofreading:
Marijana Bajin

Year:
2022

City:
Belgrade

ISBN:
978-86-82340-00-3

Circulation:
15

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1.

INTRODUCTION

This document represents the 12th Report of the Anti-Corruption Agency, which is, in accordance with the Law on Prevention of Corruption, submitted annually to the National Assembly of the Republic of Serbia.

In 2021, the implementation of the new Law on Prevention of Corruption gained full momentum, both in the formal and in the essential sense. This is also the year when the National Assembly adopted the Law on Amendments to the Law on Prevention of Corruption, among other things, with the aim of further harmonization with the recommendations of the Group of States against Corruption of the Council of Europe (*GRECO*). In addition, the Agency is ready to welcome the significant powers entrusted to the new Law on Referendum and the People's Initiative in the field of controlling the costs of the referendum campaign.

The Agency also received significant support from the competent state institutions, as well as international partners for the improvement of human and technical capacities, which also contributed to achieving a higher degree of efficiency and effectiveness in its work.


Although the previous year was marked by epidemiological challenges, for us it was an incentive to further emphasize the importance of consistent application of anti-corruption mechanisms, as well as to create new approaches in accordance with the powers entrusted to the law in order to reduce the possibility of corrupt behavior or some other type of irregularity occurs at all.

During this period, guided by the Agency's Mission, i.e. protection of public interest through prevention of corruption and ensuring legal and purposeful disposal of public resources, we especially strengthened cooperation with key partners at the national level, citizens, state bodies, media, and civil society.

We have completed the one-year chairmanship of the Global Network of Institutions for the Prevention of Corruption with great success. In addition, we have initiated and achieved membership in the European Network of Institutions, which has a register of lobbyists, which has further strengthened international credibility.

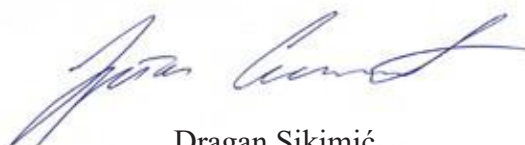
We remain committed to the rule of law and building integrity in the public sector.

PRESIDENT OF THE COUNCIL



Danica Marinković

AGENCY DIRECTOR



Dragan Sikimić

2.

ABOUT THE AGENCY

The Anti-Corruption Agency is an individual and independent state body which reports to the National Assembly of the Republic of Serbia, for the performance of activities within its competence. 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 2021 provided in the budget amounted to RSD **299,897,000.00**

The head of the agency is in Belgrade.

- The normative framework of the Agency's actions consists of:
- Law on Prevention of Corruption
- Law on Financing of Political Activities
- Law on Referendum and People's Initiative
- Law on Lobbying

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 warning measures 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;
6. gives opinions and instructions on the implementation of this Law.

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

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

Competences of the Agency established by the Lobbying Act are as follows:

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.

In order to implement the law in the reporting period, the following bylaws of the Agency were adopted or harmonized:

1. Rulebook on Amendments to the Rulebook on the Register of Public Officials and the Register of Property and Revenues of Public Officials;
2. Rulebook on amendments to the Rulebook on the manner of submitting a notice of participation in a public procurement, privatization, or other procedure the outcome of which is the conclusion of a contract with a public authority;
3. Rulebook on the appearance and content of application forms, reports, notifications and records and the manner of keeping registers and special records in the lobbying procedure;
4. Rulebook on the training program for lobbyists;

5. Instructions for the development and implementation of the integrity plan;
6. Professional training program of employees in the public sector in the field of corruption prevention for 2021.

Bylaws regulating the work of the bodies and professional services of the Agency have been adopted or harmonized:

1. Rules of Procedure of the Council of the Agency;
2. Rulebook on Stamp and Seal of the Anti-Corruption Agency;
3. Rulebook on handling classified information;
4. Rulebook on office operations and archives;
5. Rulebook on professional training and additional education of employees in the Agency for the Prevention of Corruption;
6. Rulebook on Amendments to the Rulebook on Budget Accounting in the Professional Service of the Agency for the Prevention of Corruption;
7. Rulebook on the manner of using official vehicles;
8. Rulebook on the use of official mobile phones and *SIM* cards;
9. Rulebook on the use of financial resources intended for representation expenses;
10. Instructions on office operations with classified information in the Agency for the Prevention of Corruption.

Ten basic and two special internal units have been established in the Agency, which ensure efficient and independent work. On December 31, 2021, in the professional service of the Agency, 91 people are employed.

In accordance with the Program of Professional Development and Additional Education for 2021, in order to improve their knowledge and skills, employees attended 38 trainings organized by the National Academy of Public Administration and 22 trainings organized by domestic and international partners.

The bodies of the Agency are the Director and the Council of the Agency. 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, 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.

The Council decides on appeals against decisions made by the Director, 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.

3.

THE COUNCIL OF THE AGENCY

The members of the Council were elected by the National Assembly at the session held on March 11, 2021, 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 President and Deputy President of the Council were elected, and the Rules of Procedure of the Council were adopted, was held on March 24, 2021.

The members of the Council are:

- Danica Marinković, President, Judge of the Court of Appeal in Kragujevac, retired
- Tamara Mišić, Deputy President of the Council, 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
- Prof. dr Miloš Stanković, Associate professor at the Faculty of Law, University of Belgrade
- Stevo Bajić, employed by the Agency as a member of the Council

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, made decisions on legal issues, as well as other decisions within its competence.

The members of the Council, between the sessions, analyzed the draft decisions in the cases in which the rapporteurs are. In complex legal issues, and in order to take principled legal positions, they studied the regulations that regulate a certain controversial legal issue. They considered written and oral monthly reports submitted by the Director, or submitted directly at the sessions of the Council. The members of the Council participated in various activities of the Agency and actively contributed to the implementation of its competencies.

4.

KEY RESULTS IN THE AGENCY'S ACTIVITIES DURING 2021

UNDER THE LAW ON PREVENTION OF CORRUPTION

- **1937** procedures were completed by resolving situations of conflict of interest in the performance of public functions. **333** proceedings were initiated ex officio. **347** measures were imposed on public officials for violating the law in the area of conflict of interest;
- **284** procedures were initiated to verify the timeliness of submission, accuracy, and completeness of data from the Report on Assets and Incomes (hereinafter: The Report). **219** warning measures were issued against public officials at the republican, provincial, and local levels of government;
- **134** requests for initiating misdemeanor proceedings were submitted due to non-submission of the Report or notification of non-existence of changes in assets and incomes within the prescribed deadline, i.e. submission of incorrect or incomplete Report;
- **Seven** criminal charges and reports were submitted to the competent prosecutor's offices due to suspicion that public officials did not report assets and income to the Agency or provided false information, in order to conceal data on assets and income, or due to suspicion that they committed another a criminal offense for which prosecution is undertaken ex officio.

UNDER THE LAW ON FINANCING POLITICAL ACTIVITIES

- **20** ex officio proceedings were initiated and **23** warning measures were issued;
- **209** requests for initiating misdemeanor proceedings were submitted and **13** 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;
- **One** report was submitted to the competent prosecutor's office due to the suspicion that the responsible person in the political entity committed a criminal offense.

5.

PUBLIC
OFFICIALS

“Public official” is any person who was elected, appointed, or nominated to a public authority, with the exception of persons who are representatives of private capital in managing bodies of companies that are public authorities”.

This provision should be understood as referring to and applying to persons directly elected by citizens and persons elected, appointed or appointed by the National Assembly, the President of the Republic, the Supreme Court of Cassation, the High Judicial Council, the State Prosecutors' Council, the Serbian Government, the Assembly autonomous provinces, the government of the autonomous province and the bodies of local self-government units.

AUTHENTIC INTERPRETATION

provisions of Article 2, paragraph 1, item 3) of the Law on Prevention of Corruption (*Official Gazette of RS*, No. 35/19, 88/19, 11/21, 94/21 and 14/22)

Establishing accurate, precise, and complete registers and records and regularly updating the data in them is a basic precondition in the procedure of controlling the legality of performing a public function.

In 2021, **2,151** public authorities informed the Agency that a public official had entered a public office, i.e. that his public office had ceased.

In 2021, **4,766** Reports were received in the Register of Assets and Incomes of Public Officials, while **5,615** Reports were processed and verified.

Responsible performance of public office is reflected, among other things, in the declaration of assets and income to the Agency upon entering, during the performance, as well as after the termination of public office. According to the annual plan, the Agency checks the timeliness of submission of reports, as well as the accuracy and completeness of data in them. During the procedure of verification of the Report, the property status is monitored, i.e. whether there is a discrepancy between the data stated in the Report and the actual situation, as well as a discrepancy between the increased value of assets and reported income. Verification of reports and monitoring of property status during and after the termination of public office is a strong anti-corruption mechanism that contributes to strengthening the personal integrity of public officials and leads to the strengthening of the institutions in which they hold public office. Moreover, by reviewing the Report of Public Officials, the Agency makes a significant contribution to the work of repressive bodies in resolving cases in which there is a suspicion of corruption or other irregularities.

In addition to the registers, the Agency also keeps a Register of legal entities in which a public official or family member has shares or stocks. During 2021, eight legal entities submitted to the Agency **375** notifications on participation in public procurement, privatization, or other procedures.

Keeping, controlling, and publishing records of legal entities in which a public official or family member owns shares or stocks contributes to preventing the abuse of public office to gain any benefit, for himself or a family member.

The Agency maintains a Catalogue of Gifts for Public Officials. The Catalogue of Gifts for 2020 was published within the legally prescribed deadline of June 1, 2021, and includes **210** protocol and occasional gifts.

Most gifts were reported by: The General Secretariat of the President of the Republic, the Ministry of Defense, the Ministry of Foreign Affairs, and the City Assembly of Novi Sad.

PROCEDURE OF THE AGENCY WHEN CHECKING THE TIMELINESS OF SUBMISSION AND CONTENT OF THE REPORT

During 2021, the Agency checked the timeliness of submitting the Report by comparing the Register of Public Officials and the Register of Assets and Incomes of Public Officials.

In addition, the accuracy, completeness, and timeliness in the submission of the Report for a total of **395** public officials were checked, according to the Annual Verification Plan for 2021 and earlier.

The annual audit plan of the Report for 2021 includes **200** public officials: directors and members of management boards of agencies, commissions, and other regulatory bodies, independent organizations and bodies exercising public authority, governor, vice governor, council members and members of the Assembly of the Autonomous Province of Vojvodina.

Moreover, during 2021, a total of **11** extraordinary checks 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 **284** proceedings were initiated against public officials at the republican, provincial, and local levels of government for violating the Law on the Prevention of Corruption.

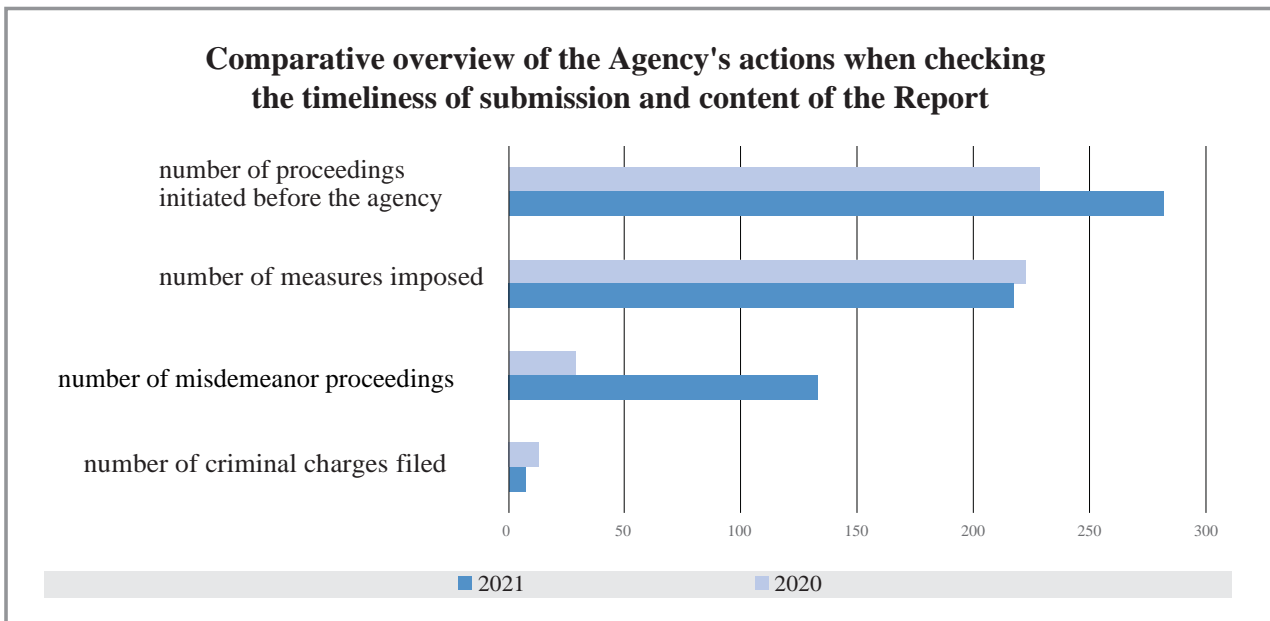
Proceedings have been initiated:

- due to untimely submission of the Report and due to submission of incorrect or incomplete Report after election or appointment to public office - 136
- due to untimely submission of the Notice on the absence of changes in property and income after re-election or appointment to public office - 16
- due to untimely submission of the Report and due to submission of inaccurate or incomplete Report upon termination of public office - 58
- due to cumulative violation of the provisions of the law - 29
- due to untimely submission of the Report on significant changes in assets and incomes during the public office - 42
- due to untimely submission of the Report on significant changes in assets and incomes after the termination of public office - three

A total of **219** warning measures were issued for violating the Law on Prevention of Corruption.

Structure of issued warning measures:

- due to untimely submission of the Report and due to submission of incorrect or incomplete Report after election or appointment to public office - 87
- due to untimely submission of the Notice on the absence of changes in property and income after re-election or appointment to public office - 23
- due to untimely submission of the Report and due to submission of inaccurate or incomplete Report upon termination of public office - 49
- due to untimely submission of the Report on significant changes in assets and incomes during the public office - 25
- due to cumulative violation of the provisions - 35



Year	Number of initiated proceedings	Number of warning measures filed	Number of misdemeanor proceedings filed	Number of criminal charges/reports filed
2021	284	219	134	7
2020	230	224	29	13

During 2021, the Agency Council received two appeals against the decisions of the Agency's Director, which issued warning measures to public officials.

- A total of **134** requests for initiating misdemeanor proceedings were submitted due to non-submission of the Report or Notice on non-existence of changes in assets and income within the prescribed deadline, i.e., submission of incorrect or incomplete Report.

The Misdemeanor Court in Belgrade issued a total of **52** decisions based on requests for initiating misdemeanor proceedings submitted before and during 2021.

Comparative overview of the decisions of the Misdemeanor Court		
	2020.	2021.
Convictions	52	31
Acquittals	2	1
Decision on suspending / terminating the procedure	32	20

Seven criminal charges and reports were submitted 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.

Outcomes of the criminal charges filed by the Agency with competent prosecutors' offices before and during 2021.

Comparative overview of actions according to criminal reports and reports of the Agency submitted before and during 2021		
	2020	2021
Convictions - paroles	2	3
Conduct of evidentiary actions in progress	24	24
Criminal charges dismissed, applying the principle of opportunity	4	2
Criminal charges dismissed	8	10
An acquittal decision	1	1
Suspension of criminal proceedings	*	1

Eight reports were submitted to other competent state bodies (three to the Tax Administration, five to the Administration 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 offence within the competence of that authority.

ACTION OF THE AGENCY IN THE FIELD OF CONFLICT OF INTEREST

In the reporting period, in connection with the resolution of conflicts of interest, a total of 1937 proceedings were completed, as follows:

375 opinions were given on the implementation of the Law on Prevention of Corruption.

906 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 public office - "revolving doors" have been resolved.

- in 722 cases, the Agency has given its approval for the performance of another public office i.e. for the performance of another work or activity;
- 37 decisions were adopted rejecting the request of a public official for approval of the performance of another public office i.e. for the performance of another work or activity (of which nine are determinative);
- in 35 cases the Agency informed the public official about the situation of conflict of interest;
- 107 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

347 decisions determining the violation of the provisions of the Law were adopted, as follows

- 280 decisions imposing a warning measure;
- ten decisions imposing a measure of public disclosure of a recommendation for dismissal from the public office;
- 39 decisions determining the violation of the law and the imposed measure of public disclosure of the decision on the violation of the law;
- 18 decisions which established a violation of the provisions of Art. 56 of the Law on Prevention of Corruption and the termination of public office by force of law, of which in one case a warning measure was imposed.

In **309** procedures initiated ex officio and on the basis of the report, no violation of the law was established and they were resolved in another way (by means of a decision on suspension of procedure, informing the parties that there are no grounds for conducting the procedure for deciding on the existence of a violation of the provisions of the Law on Prevention of Corruption, informing the parties that the Agency is not competence, by means of an official note, etc.).

Public officials have shown a high level of personal integrity by addressing the Agency in large numbers, respecting their obligations under the Law on Prevention of Corruption, or simply seeking an opinion.

During 2021, the Agency received a total of 1213 requests from public officials, of which 813 were

requests for consent to perform other public functions, i.e. other work or activities, for membership in association bodies, for employment or business cooperation after termination of public office – “revolving doors” and 400 requests for opinions on the implementation of the Law on Prevention of Corruption, regarding the matter of conflict of interest.

Regarding the requests for consent of public officials, there is a continuous increase in execution, i.e. acting on the final decisions of the Director of the Agency, which rejected their requests, which indicates that public officials show increasing responsibility and integrity in performing public office. Expressed in percentages, the enforceability of the mentioned decisions is 100%.

30 public officials stopped performing incompatible public functions at the same time, i.e. performing work, activities, which according to the total number of executive decisions (30) which expired the deadline for action amounts to 100% of execution. In this way, the Agency acted preventively and prevented illegal incompatibility of public functions, or public functions and jobs, i.e. prevented conflicts of interest, which could turn into corruption, because conflicts of interest are considered a prelude to corruption.

The agency made **347** decisions due to the violation of the Law on Prevention of Corruption in the area of conflict of interest.

In the reporting period, the largest number of decisions determining the violation of the Law on Prevention of Corruption, a total of **126**, were imposed on public officials due to the cumulating of public functions¹, while the other measures, **63** of them, were imposed on public officials in situations that represent conflict of interest and nepotism².

By applying the provisions of Art. 56 of the Law on Prevention of Corruption, **126** decisions were issued, by which the Agency issued **104** warning measures, **four** measures of public announcement of the decision on violation of the law and **18** decisions determining the termination of another public function by force of law.

In situations that represent a conflict of interest and nepotism, by applying the provisions of Art. 40 and 42 of the Law on Prevention of Corruption, the Agency imposed **63** measures, **18** warning measures, **35** measures of public announcement of the decision on violation of the law and **ten** measures of public announcement of the recommendation for dismissal from public office.

Due to the non-transfer of management rights in the company³, the Agency issued **29** warning measures by applying the provisions of Article 51 of the Law on Prevention of Corruption.

1 Violation of the Article 56 of the Law on Prevention of Corruption

2 Violation of Articles 40 and 42 of the Law on Prevention of Corruption

3 Violation of the provisions of the Article 51 of the Law on Prevention of Corruption

Of the imposed warning measures, **48** were warning measures with an order to a public official for certain actions, of which in **28** proceedings the public official acted in moderation, in **two** cases the public official did not act, **which represents 93.33% of the number of executive decisions in which the deadline of action has expired (30)**. In **four** procedures, the deadline for action is in progress, while in **14** procedures the decision is not final (in eight procedures the deadline for appeal has not expired, and in six procedures the procedure on appeal is in progress).

Regarding the issued measures of public announcement of recommendations for dismissal from public office, in situations of conflict of interest, out of **ten** decisions imposing the said measure, **six** were enforceable and in those procedures initiatives (memos) were sent to decision-making bodies, of which in **one** case a public official was dismissed (acted on the initiative), in **one** case the public authority did not accept the initiative and did not dismiss the public official, in **one** case the public office ceased before the initiative was submitted, in **three** cases the deadline for acting on the initiative. In **four** procedures, the decisions are not final (in **two** procedures, the decision is being delivered to a public official, in **two**, the appeal procedure is in progress).

Out of **ten** measures of public announcement of recommendations for dismissal from public office, seven measures were imposed on public officials who perform public functions in local self-government units (**one** to the mayor, **one** to the deputy mayor, **two** to the municipal council, **one** to the director of a public company, **two** to the director of the center of culture), **two** measures were imposed on public officials who perform public functions in the bodies of health institutions (director of the health center and director of the public health institute) and **one** measure was imposed on a public official who performs public function in the institutions of the education system (Faculty).

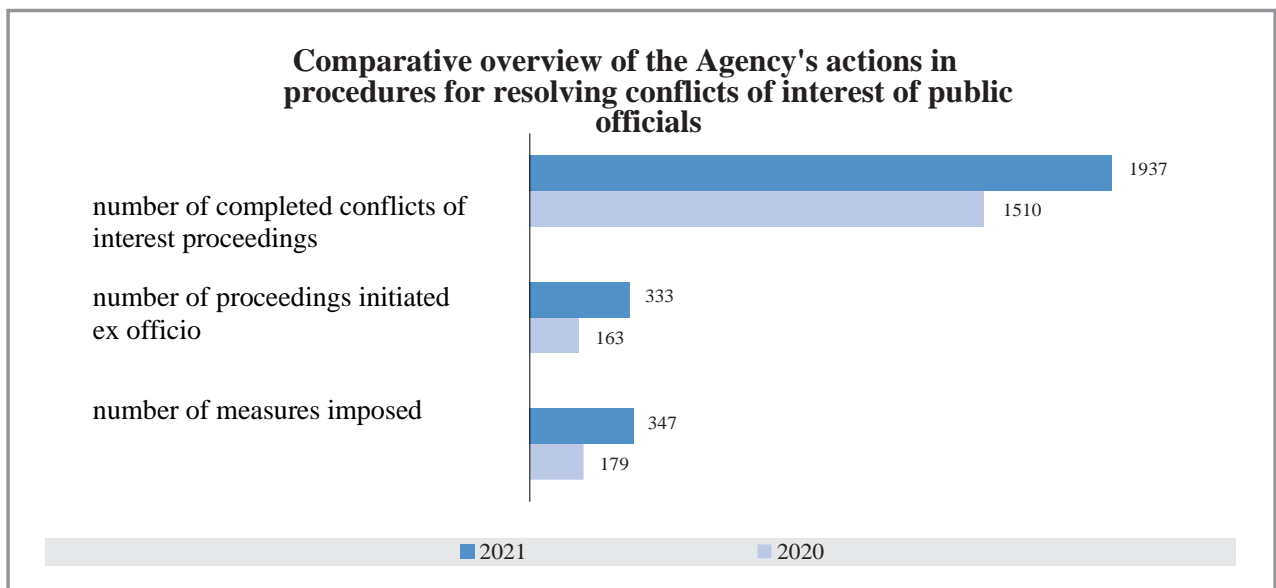
The work of the Agency, especially in the area of conflict of interest, was also influenced by the Authentic Interpretation of the Term "Public Official", which was adopted by the National Assembly in February 2021. Therefore, 129 procedures related to conflicts of interest were resolved in a different way, and not possibly by imposing an appropriate measure. Thus, 38 proceedings were resolved by making a decision to suspend the proceedings, because the person against whom the proceedings were conducted is no longer a public official; 74 proceedings were resolved by notifying the applicant of the outcome of the proceedings that there were no grounds, because no proceedings were conducted against the person against whom the complaint was filed due to the fact that he was not a public official based on an authentic interpretation; 17 proceedings were terminated by an official note, as they were filed by anonymous applicants against persons who are no longer considered public officials.

Due to the stated authentic interpretation, the number of submitted reports submitted by natural and legal persons was reduced, and thus the measures imposed due to violation of the law, considering that in the previous period citizens most often reported violations of the law to the Agency, which may have been caused by nepotism by management bodies in educational institutions, which are no longer public officials.

The initiative of the Agency for initiating the procedure for adopting an authentic interpretation of Art. 46 of the Law on Prevention of Corruption was adopted by the National Assembly through the Amendments to the above mentioned Law, as well as the proposals of the Agency regarding the entire amendment of the said Article. In this way, the issue of incompatibility of public office, which requires permanent or full-time work, with the simultaneous performance of other work or activities, is regulated even more precisely.

The Agency resolved the requests of public officials, who were waiting for the adoption of the said initiative, immediately, within the legal deadline, after the adoption of the Amendments to the Law on Prevention of Corruption, in accordance with the new amendment to Art. 46. of th Law on Prevention of Corruption.

Year	Number of completed conflicts of interest proceedings	Number of proceedings initiated ex officio	Number of measures imposed
2021	1937	333	347
2020	1510	163	179



6.

DECISIONS OF THE AGENCY'S COUNCIL

After ten sessions held, the Council decided on **82** appeals. Out of that, **60** appeals were rejected as unfounded, and according to **22** appeals, the first instance decisions were annulled.

Regarding annulled decisions, it should be noted that in 16 cases the Council ex officio annulled first instance decisions due to the application of the provisions of the new Law on Prevention of Corruption⁴, so in four cases where first instance decisions were made during the previous Law on the Anti-Corruption Agency, the Council, after the annulment of the first instance decision, determined violations of the law and imposed measures by applying the provisions of the Law on Prevention of Corruption. In addition, the Law on Prevention of Corruption and the adopted authentic interpretation regulated certain issues in a different way, and therefore, in two cases, the Council ex officio, after annulling the first instance decisions, suspended the proceedings due to the obsolescence of administrative proceedings⁵; in one case it suspended the procedure because the public official did not have the obligation prescribed in the previously valid law; in six cases it suspended proceedings because public officials, who had that status under the previously valid law, are no longer public officials under the Law on Prevention of Corruption and Authentic Interpretation, and in three cases it returned the case to the first instance body for retrial at the request of a public official for giving consent for performing another public function because one of the public functions does not represent a public function in the sense of the Law on Prevention of Corruption and Authentic Interpretation.

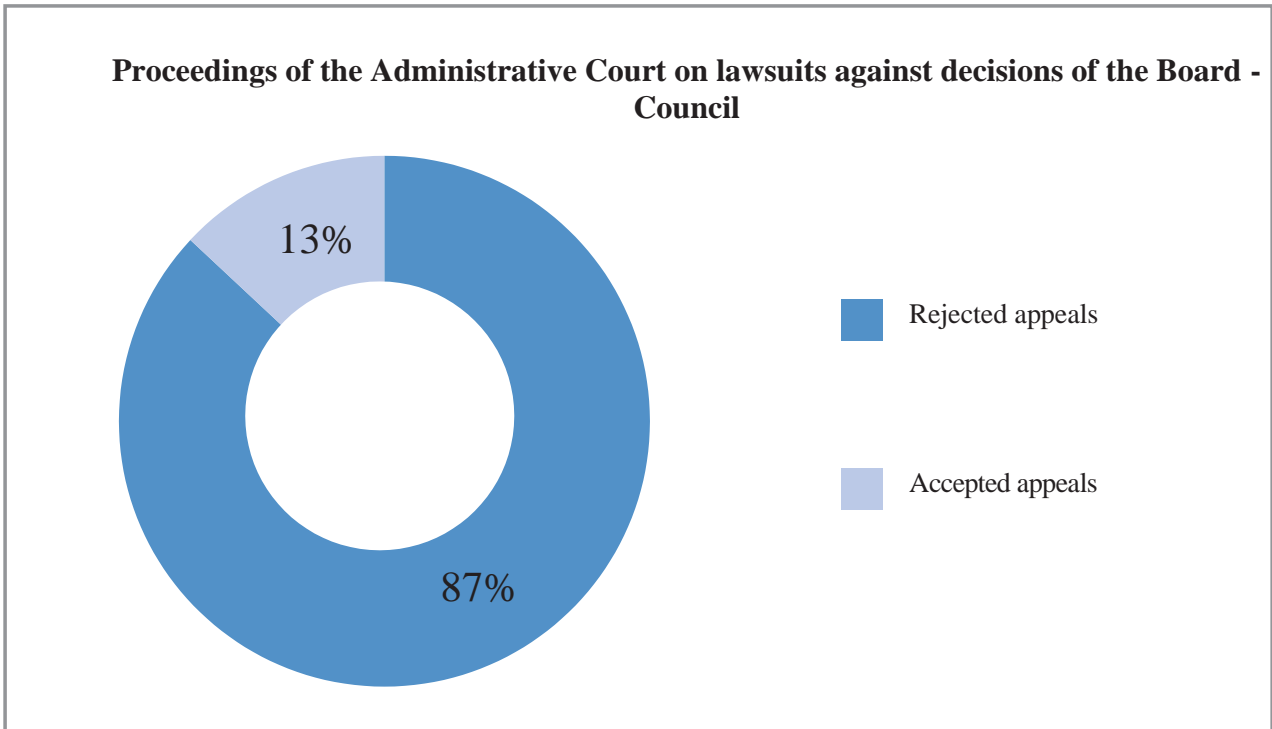
In the remaining **six** cases, the Council accepted the appeal, annulled the first-instance decisions and resolved the administrative matter, or returned the case to the first-instance body for retrial.

During 2021, the Administrative Council responded to **29** lawsuits filed for annulment of the Board's decisions⁶ made in the appeal procedure, and **54** more administrative disputes are pending against lawsuits from previous years.

During 2021, the Administrative Court delivered **23** judgments. **20** lawsuits were rejected, and three lawsuits were accepted

-
- 4 The provision of Art. 109 of the Law on Prevention of Corruption, it is prescribed that the proceedings will be initiated according to the provisions of the Law on the Anti-Corruption Agency, which are not completed by the day of application of this law, will be completed according to the provisions of this law.
 - 5 This is due to the fact that, unlike the previously valid law, the Law on Prevention of Corruption, and the provisions of Art. 43, Paragraph 1 and 2, as well as the provision of Art. 77, Paragraph 2, which is applied from October 5, 2021 when the Law on Amendments to the Law on Prevention of Corruption ("Official Gazette of RS", No. 94/21) came into force, prescribed statutes of limitations for initiating and terminating proceedings before the Agency.
 - 6 Until the day of the beginning of the application of the Law on Prevention of Corruption on September 1, 2020, the Board as the second instance body of the Agency decided on appeals filed against the decisions of the Director of the Anti-Corruption Agency.

Structure of first instance decisions issued by the Council, acting on appeals	Number
Decision establishing violation of the law and issuing a warning / warning measure to the official with an order for certain actions	26
Decision establishing violation of the law and issuing a warning / warning measure of public announcement of the decision on the violation of the Law of the Agency	16
Decision on rejection of the request for giving consent for performing another public function	12
Decision on rejection of the request for approval of another public office, rejected as untimely	9
Decision determining violation of the law and imposing on the official the measure of public announcement of the recommendation for dismissal from public office	8
Decision on rejection of requests for approval of performing another job apart from the public office	4
Decision on the notification for the official performing another work or activity which was established as a conflict of interest, obliging the official to stop performing that work or activity	3
Decision rejecting the request for approval for performing another work or activity, rejected as untimely	1
Decision on rejection of the request for reimbursement of the costs of the procedure	1
Decision to correct the error in the decision	1
Decision rejecting the submission - declaration of a public official as untidy	1
Total	82



7.

POLITICAL ENTITIES

“political party” is an organization of citizens recorded in the Register of Political Parties with the competent authority, in accordance with law;

“coalition” is a form of association of political entities for joint participation in elections, which regulate their mutual relations by contract, attested in accordance with law governing attestation of signatures;

“citizen’s group” is a form of association of political entities for joint participation in elections, which regulate their mutual relations by contract, attested in accordance with law governing attestation of signatures;

LAW ON FINANCING POLITICAL ACTIVITIES

("Official Gazette of RS" No. 14/22)

ACTION OF THE AGENCY IN THE FIELD OF CONTROL OF FINANCING OF POLITICAL ACTIVITIES

In 2021, the Agency controlled the report on election campaign expenses for the election of parliament members and councilors of the cities of Šabac and Zaječar, the assemblies of the municipalities of Kosjerić, Preševo, Majdanpek and Negotin. The results of controls were published on the Agency's website, in the form of the Report of Political Entity Financing Oversight for the election of councilors to the Assembly of the City of Šabac for 2020, The Report of Political Entity Financing Oversight for the election of councilors to the Assembly of Zaječar and Preševo for 2021, the Report of Political Entity Financing Oversight for the election of councilors in the Municipal Assemblies of Mionica and Negotin for 2021. The control covered 100% of the total funds collected and spent by all political entities that submitted reports. The control related to the activities of political entities from the date of calling the elections to the date of announcing the results.

In addition to the analysis of sources of financing and costs of election campaigns for a total of **35** political entities, the reports contain an overview of observed irregularities and possible violations of the Law on Financing of Political Activities, as well as data on submitted requests for initiating misdemeanor proceedings before the competent court.

In addition to the **35** political entities for which the findings of control were published in the reports on the control of election campaign costs, **35** annual financial statements of political entities were also controlled, nine of which refer to 2019 and **26** to 2020. The results of the control were published on the Agency's website in the form of the Report on the Control of Financing of Political Activities for 2021 - Report on the Control of the Financing of the Costs of Political Activities for 2020. Due to the violation of the provisions of the Law on Financing of Political Activities, the Agency submitted to the competent misdemeanor court a total of 209 requests for initiating misdemeanor proceedings against political parties and responsible persons in political parties, i.e. responsible persons of citizen groups.

The decision on the loss of the right to obtain funds from public sources intended for financing the regular work of a political entity in the next year s is made on the basis of a final judgment of the misdemeanor court by which a monetary fine was imposed, and if the political party or group of citizens has representatives in representative bodies. The agency made **13** such decisions during 2021.

All registered political parties, as well as groups of citizens who have representatives in representative bodies, were required to submit to the Agency by April 15 of the current year the Annual Financial Statement for the previous year, as well as the report on contributions and assets (hereinafter: AFS), with the previously obtained opinion of the certified auditor.

The legal obligation to submit the AFS was fulfilled by **164** political entities, of which **79** were political parties and **85** groups of citizens.

The control covered 95,97% of total revenues and 95,56% of total expenditures generated by all political entities that submitted AFS for 2020. The agency controlled **26** political entities that submitted AFS for 2020. Criteria to consider when selecting a report for an annual control plan are:

- political entities with the highest declared incomes on duly submitted I1 forms in 2020,
- political entities with the highest declared expenditure in 2020,
- political entities with the highest income/expenditure gap in 2020 and,
- all parliamentary political parties.

In the formal and substantive control procedure, irregularities were observed:

- failure to submit the AFS to the Agency,
- non-regular use of funds,
- submitting an AFR that does not contain all data,
- failure to publish the AFR on the political entity's website,
- failure to publish incomes exceeding the average monthly earnings on the political entity's website.

During 2021, elections were held for councilors in the Assembly of the City of Zaječar and the Municipal Assemblies of Kosjerić, Preševo, Mionica, and Negotin.

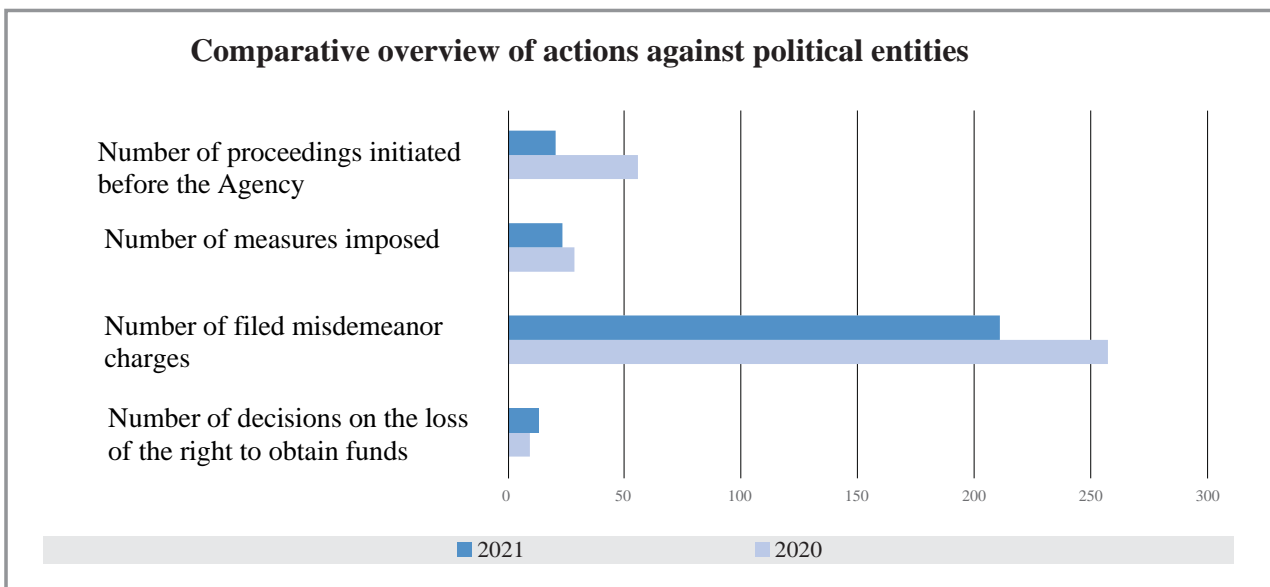
All political entities with declared electoral lists in the elections held in 2021 (**34** entities) were obliged to submit to the Agency, within 30 days from the date of publication of the final results, a Report on election campaign costs (hereinafter: I2 report) with data on the origin, amount, and structure of funds collected and spent, from both public and private sources. **27** political entities fulfilled the legal obligation, i.e. 79,41% of the total number of political entities obliged to submit a report.

In the formal and substantive control procedure, irregularities were observed:

- non-submission of the I2 report to the Agency,
- the report does not contain all data.

Due to the suspicion of a violation of the Law on Financing of Political Activities, the Agency initiated **20** proceedings and issued **23** warning measures in the reporting period. **One report** was submitted to the competent prosecutor's office due to the suspicion that the responsible person in the political entity committed a crime.

The Agency organized and conducted monitoring of election activities of political entities from February 26 to March 28, 2021 for the elections for councilors of the Assembly of the City of Zaječar. For the purpose of performing data collection activities from the field and their unification, the Agency hired one field observer.



Year	Number of proceedings initiated before the Agency	Number of measures imposed	Number of filed misdemeanor charges	Number of decisions on the loss of the right to obtain funds
2021	20	23	209	13
2020	55	28	255	9

Note: Consider the comparative presentation in the context of the reporting period. In 2020, elections were held at all levels.

A gender perspective is included in the processing of data based on the submitted reports of political entities. The analysis of 149 political entities established that 21 authorized persons are female or 14.09%, while 128 authorized persons are male - 85.91%.

Additionally, the analysis of the submitted requests for initiating misdemeanor proceedings established that out of the total number of submitted requests, in 25 cases the authorized person is in a female political entity.

After the review of actions in the reporting period, in order to act even more efficiently in the next, the Agency makes new recommendations on the next page of the Work Report.

8.

RECOMMENDATIONS

RECOMMENDATIONS

- Adopt the Law on Amendments to the Law on Lobbying so as to prescribe that the data from the report on the work of lobbyists and notifications on lobbying contacts of lobbied persons, as well as on the records of the authorities, are public as well as to prescribe and specify the obligation of lobbyists persons to report lobbying contacts to authorities in which they either hold public office or are employed or otherwise employed;
- Authorized proposers of laws should consistently and timely fulfill their obligation to submit draft laws to the Agency, which gives its opinion on the assessment of corruption risk in laws in the field of particularly high-risk corruption;
- In order to achieve greater success in the implementation of defined activities in the process of European integration, use the findings and recommendations formulated by the Agency in the first Report on the Supervision of the Implementation of the Revised Action Plan for Chapter 23 - Sub-Chapter: Combat Against Corruption;
- Introduce ethics and integrity in curricula for pre-school, primary, secondary and higher education in order to establish a systemic (holistic) concept of preventing corruption;
- Provide sufficient material and financial resources for regular operation of the Agency.

9.

RESULTS AND OTHER AGENCY ACTIVITIES DURING 2021

THE ROLE OF THE AGENCY IN THE PROCEDURE OF ADOPTING LAWS AND OTHER REGULATIONS

The Agency shall initiate the adoption of regulations to eliminate the risk of corruption or align regulations with ratified international agreements in the field of fight against corruption.

State administration authorities are obliged to submit to the Agency draft laws from fields that are particularly susceptible to risks of corruption and draft laws regulating issues covered by ratified international agreements in the field of fight against corruption, to enable the Agency to provide opinions on the assessment of the risk of corruption.

LAW ON PREVENTION OF CORRUPTION

("Official Gazette of RS" No. 35/2019, 88/2019, 11/2021 - authentic interpretation, 94/2021, 14/2022).

The Agency developed and adopted the **Methodology on Corruption Risk Assessment** (hereinafter: the Methodology). The methodology is the result of cooperation with the OSCE Mission to Serbia and was developed in order to implement the Agency's responsibilities in the field of risk assessment of corruption in regulations, as well as to adopt rules aimed at eliminating the risk of corruption in regulations.

Applying the adopted Methodology, the Agency, within the implementation of competencies in the field of corruption risk assessment in regulations, prepared **15** opinions on draft laws, as well as regulations in the field of particularly risky for corruption, as follows:

- Draft Law on Amendments to the Law on Secondary Education;
- Draft Law on Regulation of the Agricultural Products Market (two opinions);
- Proposal of Decree on Amendments to the Decree on Internal and Public Competition for filling vacancies in state bodies;
- Draft Law on Referendum and People's Initiative (three opinions);
- Draft Law on the Protector of Citizens (two opinions);
- Draft Law on Amendments to the Law on Higher Education;
- Draft Law on Student Organization;
- Draft Law on Amendments to the Law on Health Insurance;
- Draft Law on Amendments to the Law on Free Access to Information of Public Importance;
- Draft Law on Amendments to the Law on Education Inspection;
- Proposal for a regulation on determining competencies for the work of civil servants.

From the given opinions, the Agency informed the applicant in four cases that there were no objections to the text of the draft, i.e. the draft regulation in relation to which it assessed the risk of corruption, while in 11 cases it pointed out risk factors and risks of corruption in the provisions of the regulations and gave recommendations for their elimination.

Requests for opinions were sent by:

- Ministry of Public Administration and Local Self-Government – six requests;
- Ministry of Education, Science and Technological Development – four requests;
- Ministry of Agriculture, Forestry and Water Economy – two requests.

One request for an opinion was sent to the Agency by the Ministry of Health and the Government of the RS - Human Resources Management Service, while the Agency gave an opinion ex officio, joining the public debate conducted on the proposal of the Ministry of Public Administration and Local Self-Government regarding the Law on the Protector of Citizens. In addition to the above, the Agency received a request from the Ministry of Education, Science and Technological Development on December 30, 2021 according to which the opinion will be given in 2022.

In the course of 2021, in order to more efficiently implement the legal provisions related to the assessment of corruption risk in regulations, application software for monitoring cases related to the Agency's actions related to draft laws in the field of particularly risky corruption was developed and put into production, and draft laws regulating issues covered by ratified international agreements in the field of anti-corruption.

LOBBYING

Lobbying is an activity through which persuasion is directed at authorities of the Republic of Serbia, an autonomous province or a local government unit, bodies of public agencies, institutions and regulatory bodies founded by the Republic of Serbia, autonomous province, local government unit (hereinafter referred to as: authorities), in the process of adoption of laws, other regulations and general acts that fall under jurisdiction of these authorities, for the purpose of promoting the interests of the Lobbying Client, in accordance with the law.

LAW ON LOBBYING

("Official Gazette of RS" No. 87/2018 and 86/2019 - other law)

Through a series of activities, the Agency influences the application of the Law on Lobbying and respecting the ethical rules from the *Code of Conduct for Lobbying Participants* in the Republic of Serbia to create the best conditions for lobbying to become an important tool in strengthening democracy based on transparency, rule of law, and social responsibility. The legal regulation of lobbying mostly protects the public interest, improves the publicity of the work of state administration bodies, strengthens the integrity and responsibility of lobbyists who perform public functions and raises citizens' trust in the decision-making process.

The public has the right to know how institutions and public officials made decisions, ie who lobbied in favor of current issues. Decision-makers should set an example by their personal behavior when it comes to relations with lobbyists whose role is legitimate and defined by law. Therefore, the recommendation given by the Agency to the National Assembly in the field of lobbying is very important, so that all reports, notifications and records related to lobbying contacts are transparent.

In the reporting period, the Agency held **five** trainings for lobbyists, which were attended by **29** candidates. After checking the knowledge of the training program, the participants received a Certificate of Completed Training for Lobbyists. **13** decisions on entry in the Register of Lobbyists were made, one decision on entry in the Register of Legal Entities Performing Lobbying and one decision on deletion from the Register of Lobbyists.

12 lobbyists were registered in the Register of Lobbyists, one legal entity was entered in the Register of Legal Entities Performing Lobbying, and **one** lobbyist was deleted from the Register of Lobbyists.

The agency received **five** notifications from lobbyists about lobbying contacts.

In 2021, the Agency became a member of the European Network of Institutions with a Register of Lobbyists (*ELRN*) and presented the normative framework and practice in the field of lobbying in the Republic of Serbia at the annual conference of the network.

10.

COOPERATION OF THE AGENCY WITH PUBLIC AUTHORITIES

In performing tasks within its purview the Agency shall cooperate with public authorities and other legal persons.

The Agency shall cooperate with scientific institutions and associations.

The cooperation shall consist of joint actions in the implementation of strategic documents in the field of fight against corruption, implementation of training programmes, research into the state of corruption and other activities important for the prevention of corruption.

LAW ON PREVENTION OF CORRUPTION

("Official Gazette of RS" No. 35/2019, 88/2019, 11/2021 - authentic interpretation, 94/2021 and 14/2022).

THE ROLE OF THE AGENCY IN THE EUROPEAN INTEGRATION PROCESS

- Preconditions for monitoring the implementation of the Revised Action Plan for Chapter 23 – Sub-chapter: Combat Against Corruption have been met and the First Implementation Report for the period from the adoption of the Revised Action Plan on July 10, 2020 to December 31, 2020 has been prepared;
- Quarterly supervision on the implementation of the Revised Action Plan for Chapter 23 – Sub-chapter: Combat Against Corruption was conducted, three quarterly reports for 2021 were prepared and an application for reporting with Instructions for Use⁷ was created;

Since the beginning of the implementation of the Law on Prevention of Corruption on September 1, 2020, the Agency has been monitoring the **implementation of the Revised Action Plan for Chapter 23 – Sub-chapter: Combat Against Corruption** and submitted the First Implementation Report to the National Assembly on March 30, 2021⁸. In addition to assessing the fulfillment for the third and fourth quarters of 2020, as well as ongoing activities, methodological framework and reviews of the implementation monitoring process, the Agency made 15 recommendations in this area in coordination, improving reporting quality and defining certain activities, carriers, and result indicators.

In 2021, three meetings of the **Coordination Body for the Implementation of the Action Plan for Chapter 23: Justice and Fundamental Rights** were held, chaired by the Minister of Justice on April 20, July 23 and November 29, 2021, with the participation of representatives Agency, in the capacity of a member and deputy member of the Coordination Body.

The revised Action Plan for Chapter 23 – Sub-chapter: Combat Against Corruption envisages that the Agency, in cooperation with relevant institutions, assess the **impact of previous measures taken to reduce corruption in risky areas** (public procurement; privatization; health; taxes; education; police; customs and local government). In 2021, preconditions were created for conducting an impact assessment in eight risk areas through the development of the Methodology, the formation of working groups, as well as questionnaires, which were submitted to the competent institutions. Data collection is ongoing, and the Agency will complete the impact assessment in 2022, as envisaged in the Revised Action Plan for Chapter 23.

⁷ The application for reporting was developed in the third quarter of 2021 and is still in the phase of testing with users, which is why the Agency simultaneously collects information from reporting entities via e-mail and correspondence;

⁸ Preview at: https://www.acas.rs/wp-content/uploads/2021/03/ASKpoglavlje_23web1.pdf.

The Agency participates in all activities within the negotiations of the Republic of Serbia for membership in the European Union. During the past year, she presented the results of her work through reporting on the implementation of the **Revised Action Plan for Chapter 23** (sub-chapters Justice, Combat Against Corruption and Fundamental Rights). In order to establish a system for monitoring the results and cases within the scope of the Agency's work, semi-annual reports were prepared on the implementation of **transitional measures for Chapter 23** in the field of conflict of interest, reporting and verification of assets and income of officials, especially judges and prosecutors.

Reporting on the results and challenges in the work and for the purpose of drafting the **annual report of the European Commission on Serbia's progress in reforms** continued, in the area of political criteria, fight against corruption, judiciary and public administration reform; on the implementation of the **Stabilization and Association Agreement (SAA)** through implementing bodies - the SAA Committee, the Justice, Freedom and Security Subcommittee and the Special Group on Public Administration Reform, as well as the implementation of the **National Program for the Adoption of the EU Acquis (NPAA)**. In 2021, in addition to the above-mentioned bodies for the implementation of the SAA, the Agency also prepared an article for the Subcommittee on Economic and Financial Affairs and Statistics. An appendix to the CEPEJ-EU questionnaire for 2020 has been prepared within the Council of Europe project on the evaluation of the results of judicial reform in the Western Balkans (*Dashboard Western Balkans*).

The Agency also contributed to the regular assessment of the situation in the field of public administration reform, conducted by **SIGMA** (a joint initiative of the Organization for Economic Cooperation and Development and the European Union), coordinated by the Ministry of Public Administration and Local Self-Government.

In the process of its own strategic planning, the Agency also relies on priorities in the field of European integration, so in 2021 it developed an **Operational Plan for the implementation of the Agency's Strategic Plan for the period 2019-2023**⁹ and monitored its implementation on a quarterly and annual basis.

⁹ The Agency's Strategic Plan was developed with the support of the *USAID* Project for Responsible Government.

SUPPORT TO PUBLIC AUTHORITIES IN DEVELOPING THE INTEGRITY PLAN

- Provided conditions for drafting and reporting on the implementation of integrity plans in the third cycle

The Integrity Plan is a preventive anti-corruption mechanism that public authorities in Republic of Serbia develop periodically, every three years. Preparation for the **third cycle** of integrity plan development required a systematic approach, i.e. the implementation of a large number of related activities¹⁰.

During 2021, the Agency continued its preparatory activities by compiling a questionnaire with a total of **149** questions in accordance with the methodology for each risk area: ethics and personal integrity, human resources management, public financial management, and information technology (IT) security which will be answered anonymously by employees of public authorities. In this way, employees will actively participate in the development of the integrity plan of their institution and point out the shortcomings in the performance of work processes, the effects of the application of regulations and procedures in practice. The application for the development and implementation of the integrity plan was upgraded in accordance with the Law on Prevention of Corruption¹¹, the revised methodology, the content of the draft (model) integrity plan and the questionnaire for employees.

In order to provide support to the coordinator, employees and the working group for the development of the integrity plan, a set of documents and educational material was made. In the same context, a Manual for the development and implementation of an integrity plan with models of decisions required for each phase, instructions for working in the application for the coordinator, employment and working group, video instructions for the working group with instructions on how to identify risky workflow and risks affect corruption and violate the integrity of the institution, as well as how to formulate measures to prevent them. The manual, instructions for work in the application, as well as video instructions are available on the Agency's website.

After all the above preparatory actions were completed, on December 1, 2021, the third cycle of drafting and implementing the integrity plan began by sending all users (**2,977**) a username and password to access the application and draft (model) of the integrity plan. In order for the records of taxpayers, as well as all necessary documents, instructions and information necessary for the development and implementation of the integrity plan to be as visible and easily accessible to those obliged to develop the integrity plan, the Integrity Plan subpage on the Agency's website was redesigned.

¹⁰ During 2020, the methodology for the development and implementation of the integrity plan was revised, by adding a set of questions for each risk process related to checking the functioning of risk processes in practice. The content of 42 drafts (models) of the integrity plan was prepared, covering a total of 84 areas, 116 different risk processes with 619 questions for existing measures, 619 proposals for risk reduction measures and 606 questions for practice. The aim of improving the methodology by adding questions for practice is to check the effects of the application of existing risk management measures, i.e. measures adopted by institutions in previous cycles of plan development and implementation. In addition, practice questions serve as a corrective to the working group in assessing risk intensity and selecting measures.

¹¹ The Law on Prevention of Corruption stipulates that those obliged to draft an integrity plan are public authorities with more than 30 employees, and as a novelty, misdemeanor liability is provided for a responsible person in a public authority if: 1) he fails to submit an integrity plan to the Anti-Corruption Agency; 2) fails to submit a report on the implementation of the integrity plan and 3) fails to designate a person who will perform coordination activities related to the adoption, implementation and reporting on the implementation of the integrity plan.

The gender component was introduced into the model of the integrity plan by supplementing the content of the integrity plan with issues on the topic of gender equality in the part related to the area of Human Resources Management.

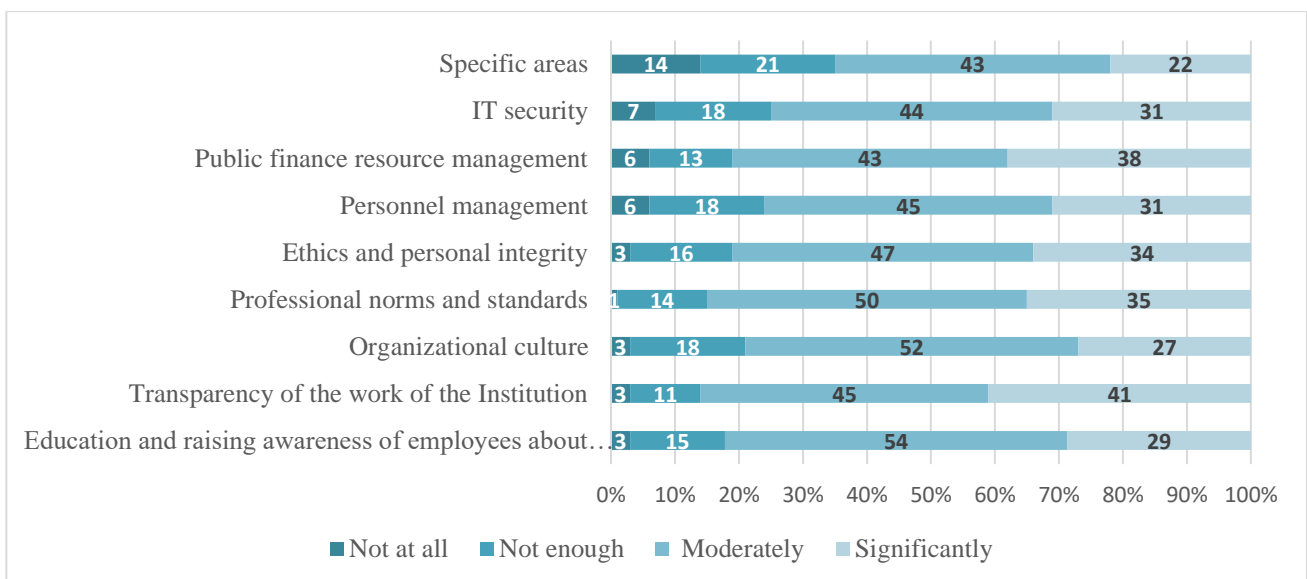
In order to improve the content of the integrity plan model for the third cycle, an online questionnaire was developed and implemented and sent to all institutions (1663) that developed and implemented the integrity plan in the second cycle. A total of 459 institutions responded to the questionnaire. Respondents assessed the extent to which the integrity plan and the whole process of its development and implementation influenced the improvement:

- a) education and raising awareness of employees about corruption and mechanisms for its prevention;
- b) transparency of the work of the institution;
- c) organizational cultures (values, beliefs, attitudes, etc. which define what is good and right in the institution) and;
- d) professional norms and standards (procedures, internal acts for the improvement of planning, monitoring and implementation of work processes, as well as the behavior of employees, etc.), as well as the improvement of common and specific areas.

The questionnaire used a four-point scale (not at all - 1, not enough - 2, moderately - 3, significantly - 4) and the respondents were given the opportunity to give a specific example or briefly describe the way in which the improvement occurred.

According to preliminary data, the majority of respondents stated that the effects of the development and implementation of the integrity plan are significant and moderate. Improving the transparency of the work of the institution was assessed by 41% of respondents as significant, and in terms of risk areas, 38% believe that in the risk area the management of public finances and resources has been significantly improved. The structure of grades according to the areas examined is shown in the graph.

Perception of the effects of the integrity plan and cycle II



As one of the Agency's competencies is to investigate corruption, analyze corruption risks and prepare reports with recommendations for eliminating risks, the Instruction for the application of methodology for assessing the risk of corruption in the work environment¹² and a list of issues for assessing the impact of anti-corruption measures. A table of verification tools for risk factor indicators was prepared with an additional description of funds for the implementation of the Methodology for Risk Assessment in the Work Environment, as well as a procedure for conducting research and preparing reports on the state and risks of corruption. The institution in which the Methodology will be tested was also selected.

In relation to integrity plans, which began with the third cycle of implementation, the methodology is a complementary tool, the purpose of which is to examine how the functioning of the organization looks like in practice when applying various regulations governing its activities. The methodology will try to shed light on a certain segment of organizational culture and examine the process and behavior of employees (mostly in high spheres of management), as well as whether they are based on certain written or unwritten norms.

¹² The methodology for assessing the risk of corruption in the work environment was developed in 2020.

IMPROVING THE ETHICAL CULTURE OF PUBLIC OFFICIALS

- Improved capacities of the National Assembly for the implementation of the Code of Conduct for members of Parliaments (MPs)

At the session held on December 24, 2020, the National Assembly adopted the Code of Conduct for MPs. The adoption of the Code of Conduct is an important step towards building the ethical culture of the National Assembly institution. Taking into account the Agency's experience in the field of public administration ethics, development of training programs, as well as the production of various types of publications, especially those aimed at better understanding and application of standards, the Agency published in 2021 **A Model Code of Conduct for MPs**. The Model Guide emphasizes the values contained in the Code that MPs should nurture in their behavior and their importance, clarifies possible doubts in the application and provides a large number of examples that illustrate situations in which they can potentially find themselves. MPs, with clear instructions on desirable behavior.

In addition to the Model Guide, as a form of assistance to the National Assembly, a training program on the Code of Conduct and obligations of MPs arising from the Law on Prevention of Corruption has been developed. The aim of the training program is to raise awareness of the importance of professional standards of conduct, their adoption and training for the effective implementation of the Law on Prevention of Corruption and the Code of Conduct for MPs.

The Agency gave another contribution to the full implementation of the Code of Conduct for MPs by designing the procedure for electing members of the Ethics Commission and devising a test for candidates from the ranks of civil servants from the National Assembly Service.

In the reporting period, trainings were held for representatives of the Provincial Secretariats on the importance, purpose and manner of drafting and implementing the integrity plan in the third cycle, organized by the Provincial Personnel Management Service.

In cooperation with the Internal Affairs Sector of the Ministry of Interior, the OSCE Mission to the Republic of Serbia and the Geneva Center for the Democratic Control of Armed Forces (DCAF) within the project "Strengthening the Capacity of the Internal Control Sector to Conduct Corruption Risk Analysis" for the members of the Ministry of Interior. Three online workshops were held to present the model of corruption risk management in Serbia. Examples are presented regarding the identification of corruption risks, risk assessment, and determination of adequate measures for corruption risk management..

In order to implement the activities "Training of employees in the Agency for Licensing of Bankruptcy Trustees to apply the Methodology for Risk Assessment of Corruption in Regulations", which is provided by the Operational Plan for Prevention of Corruption in Areas of Special Risk, within the measure "Improving Transparency of Bankruptcy held training for employees of the Agency for Licensing of Bankruptcy Trustees.

Also, in order to implement the activities "Implementation of training of employees in the Ministry of Economy for the application of the Methodology for risk assessment of corruption in regulations", provided by the Operational Plan for Prevention of Corruption in Areas of Special Risk, within the measure "Improving the transparency of the privatization process" held training for employees of the Ministry of Economy.

Organized by the University of Criminal Investigation and Police Studies, Ministry of Interior- Criminal police directorate with the support of the Bureau of International Narcotics and Law Enforcement Affairs (INL) and the International Criminal Investigative Training Assistance Program (ICITAP), a round table was organized on "Improving Institutional Capacities and inter-institutional cooperation in combating corruption". In addition to the representatives of the Agency, the participants of the round table were the Deputy Republic Public Prosecutor, Acting Director of the Directorate for the Prevention of Money Laundering, Chief Inspector of the Tax Police Sector, Deputy Prosecutors of the Special Departments of Higher Public Prosecutor's Offices for the Suppression of Corruption in Niš and Novi Sad.

The Agency actively participated in the working groups formed in the process of drafting the National Risk Assessment of Money Laundering and Risk Assessment of Terrorist Financing. Following the adoption of the RS Government Conclusion adopting the Money Laundering Risk Assessment and the Terrorist Financing Risk Assessment, the Money Laundering and Terrorist Financing Risk Assessment in the Digital Property Sector and the Risk of Financing the Proliferation of Weapons of Mass Destruction Assessment, the Anti-Corruption Agency proposed activities in the process of preparing a draft Action Plan for conducting the National Money Laundering Risk Assessment.

During 2021, the Agency concluded cooperation agreements with The Central Register of The Compulsory Social Insurance (CROSO) and the Republic Public Prosecutor's Office.

The agency independently, but also with the help of international partners, organized online workshops, which were attended by public officials from the highest national, but also provincial and local authorities. During the trainings, the Manual for Recognition and Management of Conflicts of Interest and Incompatibility of Functions was presented to public officials, which was prepared in cooperation with *USAID* in 2020, and in 2021 the entire text was harmonized with the latest amendments to the Law.

In 2021, the Agency participated in the organization and implementation of three online trainings on "Prevention of conflicts of interest, verification of property and income of public officials, registers and lobbying in the Republic of Serbia" for representatives of local governments in administrative districts in Serbia. The trainings were attended by over 250 public officials.

Three online workshops were held in cooperation with the OSCE Mission, dedicated to the implementation of the Law on Lobbying to various participants in lobbying, one of which is of an international nature dedicated to the challenges and experiences related to this matter.

The Agency also held two workshops for all participants in lobbying, which were attended by candidates who have completed lobbying training. The workshops were dedicated to the exchange of experiences, results and challenges in practice, all with the aim of improving transparency in the work of government bodies in decision-making and lobbying in this segment to become a significant activity.

The Agency held three online trainings “Implementation of the Law on Financing of Political Activities and Submission of Annual Financial Reports and Reports on Election Campaign Expenditures” for representatives of political entities.

TRAININGS ON ETHICS AND INTEGRITY FOR EMPLOYEES IN PUBLIC AUTHORITIES

- **40.340** employees and managers in public authorities successfully completed distance learning in ethics and integrity by taking a knowledge test.

The beginning of the implementation of the Law on Prevention of Corruption has introduced a significant novelty when it comes to education in the field of prevention of corruption and strengthening integrity. The law stipulates that public authorities are obliged to conduct training of employees and managers, in accordance with the training program and training instructions, and to inform the Agency in writing about the implementation of the training. During 2021, in accordance with the deadline set by the Instruction for conducting training in the field of preventing corruption and strengthening integrity, the authorities of the Republic of Serbia, the Autonomous Province, local self-government units and city municipalities were obliged to conduct training on ethics and integrity. Due to the current epidemiological situation, most of these bodies have opted for the modality of implementation, which includes attending distance training, which is available on the training portal of the Agency for the Prevention of Corruption. This method of education has many other advantages: it enables the registration of a larger number of employees, self-regulated learning in line with other obligations of students and receiving timely feedback on the learning outcome. In order to bring this process closer to the users, in addition to the Guide for the implementation of the Program and Guidelines for the implementation of training in the field of prevention of corruption and strengthening integrity, the Agency published the most frequently asked questions and answers regarding the implementation of training. This document addresses all user concerns that arose at the very beginning of the training. Moreover, the participants of the training could count on the customer support of the training administrators - employees of the Agency during the work on the training at any time.

During 2021, **50,250 user accounts** were opened based on individual or collective applications from employees (for 27,577 women and 22,673 men) from **686** public authorities. Out of the stated number, 40,340 participants (23,658 women and 16,682 men), i.e. 80.3% of registered participants, successfully completed the distance training by taking a knowledge test. All users who have successfully completed the distance training are enabled to download the electronic certificate from the user account.

In order to respond effectively to the challenges of distance training, all bodies were recommended to develop a training implementation plan. The plan is an internal document and aims to show the projected dynamics of training, taking into account the number of organizational units in the body, i.e. the number of employees and the deadline for implementation of training. Taking into account the fact that in the last quarter of 2021, 36,843 user accounts were opened, ie 73% of all open accounts during the year, the Agency recommends public authorities to plan the implementation of professional training and improve internal coordination regarding training.

The Agency has prepared and published all documents that can be helpful to trainees, as well as persons who should coordinate training at the level of public authorities, and recommends that employees get acquainted with them.

The coronavirus epidemic has brought different types of distance learning to the forefront over the past two years. It is noticeable that the trainees are somewhat accustomed to attending webinars, but self-enrollment and self-regulated learning without a lecturer require improvement.

LGU SUPPORT IN THE DEVELOPMENT OF LOCAL ANTI-CORRUPTION PLANS

- Improved the quality of the revised Local Anti-Corruption Plans (LAPs) through the implementation of the recommendations contained in the document *How to Improve the Quality of the Local Anti-Corruption Plan*.

Having in mind that the Local Anti-Corruption Plan (LAP) is an instrument of anti-corruption policy for strengthening the integrity system in local self-governments, the Agency provided **expert support to working groups for drafting LAP, members of selection bodies and bodies for monitoring LAP implementation. In the reporting period, four quarterly reports on the development of the LAP and the establishment of bodies for monitoring and reporting and six analyzes of the Draft (revised) LAP with opinions / recommendations for improvement were prepared. Based on the mentioned analyzes and lessons learned from the previous period, as well as the need to offer solutions to the identified doubts and gaps in interpretations, while promoting good solutions, the Agency drafted a document entitled *How to improve the quality of local anti-corruption plan* and published it online.**

Analysis of data on the development of LAP and the formation of a body for its monitoring at the end of the last reporting period in 2021 shows that a total of five LGUs submitted information to the Agency on LAP adoption, of which four were audited with expert assistance and only one LGU adopted the LAP for the first time. When it comes to the formation of bodies for monitoring the implementation of the LAP, out of a total of four bodies formed, one was formed in accordance with the recommendations of the LAP Model, one was formed in accordance with the Model Amendment, and two LGUs did not provide enough data to conclude whether the body was formed in accordance with the LAP Model. Information on the formation of the body, three LGUs submitted retroactively, i.e. they formed the body before 2021, and only now, they have

submitted information to the Agency. During the reporting period, only one LGU adopted the LAP, while the other four revised the existing LAPs and one LGU formed a body in accordance with the Model. From 2017 to the end of 2021, a total of 24 LGUs adopted the LAP and formed a body to monitor its implementation mainly in accordance with the Agency Model, thus fulfilling their obligation under activity 2.2.10.31. Chapter 23 of the Action Plan.

Since the process of drafting the LAP in the initial phase includes a detailed analysis of the risk of corruption, LGUs that developed the LAP in accordance with the Agency's model, took a step forward compared to the LGUs that did not. However, the implementation of this document by a large number of LGUs remains questionable. Namely, out of 101 LGUs that developed LAPs in full or partially in accordance with the Agency's Model, 47 (46.5%) LGUs submitted a response to the Agency in terms of implemented activities. Of that number, seven (about 15%) answered that they carried out most of the (60-90%) planned activities, 10 (about 21%) LGUs answered that they carried out between 40-60% of planned activities, nine (9%) LGUs answered that they carried out between 20-40% of activities and six (about 13%) LGUs carried out less than 20% of planned activities. Unfortunately, 15 (about 32%) LGUs reported that they did not implement the planned activities at all or it was not possible to draw a conclusion from their response on the number of implemented activities.

Regarding the monitoring and reporting on the implementation of the LAP, out of 24 independent bodies for monitoring the implementation of the LAP, which were formed in accordance with the Agency Model, nine of them submitted a response regarding the monitoring of the implementation of the LAP. Of that number, two independent monitoring bodies prepared reports and submitted them to the local self-government for consideration, but the reports were not considered; four responded that the local government did not provide conditions for their work and that there was no support or will/understanding for their work at all; three independent monitoring bodies responded that the report was being prepared because they did not meet regularly due to the epidemic situation caused by the coronavirus.

Based on the available data, the conclusion is that monitoring and reporting on LAP implementation and the establishment of a body to monitor LAP implementation are key challenges, in addition to LAP implementation itself. Most local self-government units stopped at the formal adoption of the document, without making efforts to incorporate LAP activities into everyday work tasks and work goals, so it can be concluded that for most LGUs the adoption of LAP was a goal in itself.

Viewed from this angle, the question of sustainability of this anti-corruption instrument in this form is raised, and in this context the optimization and improvement of the content of planning documents for prevention of corruption in local self-government units follows (activity envisaged by the Operational Plan for Prevention of Corruption).

11.

CITIZEN PARTICIPATION IN THE PREVENTION OF CORRUPTION

ACTION ACCORDING TO PETITIONS

Within its competences, the Agency acts upon written appeals addressed to the Agency in which natural or legal persons state facts that raise suspicion of corruption, arising from the use of official or social position or influence of a public official, actions of public authorities or the use of public resources.

Given the preventive role that the Agency, according to its competencies, generally has, the Agency's action on complaints is characterized by pointing out to public authorities irregularities that create opportunities for corruption in the public sector. Namely, the provisions of the Law stipulate that if, during the proceedings on the petition, facts are established and evidence is presented that raises suspicions that there are irregularities in the work of public authorities, the Agency submits a reasoned proposal for supervision to the body supervising public authorities. petition filed. In addition, if, acting on the petition, the Agency assesses that there are circumstances in the work of public authorities that may lead to corruption, it shall make recommendations to the public authority with measures to eliminate the situation, with a deadline for their undertaking. In addition, the Law introduced a significant change so that, under certain conditions, the Agency can act on anonymous applications, which the Law on the Anti-Corruption Agency did not allow.

During 2021, **254** cases were formed based on petitions of natural and legal persons, and the proceedings in **464** cases from the reporting period and previous years were completed. During the analysis of the submitted applications, the Agency noted the structure in the reporting period: 47 in the field of justice, 45 in the field of local self-government, 36 in the field of education, 27 in the field of construction and urbanism, 21 in the field of public enterprises, 17 in the field of public finance. health, 10 in the field of labor and social policy, eight in the field of police, seven in the field of agriculture, three in the field of culture and information, two in the field of mining and energy, two in the field of sports, as well as 19 petitions which the Agency is not competent to act on.

Considering that Article 87 of the Law establishes the obligation of the Agency to protect the identity of the applicant when dealing with petitions, the Agency addresses the petitioner during the handling of petitions and requests his consent to disclose information to another state body for further action. . During the reporting period, the Agency contacted the applicant in 41 cases for information..

Acting on petitions received during 2021, as in the previous period, in 22 cases the Agency declared it incompetent to act on the petition and referred the case to the competent authority.

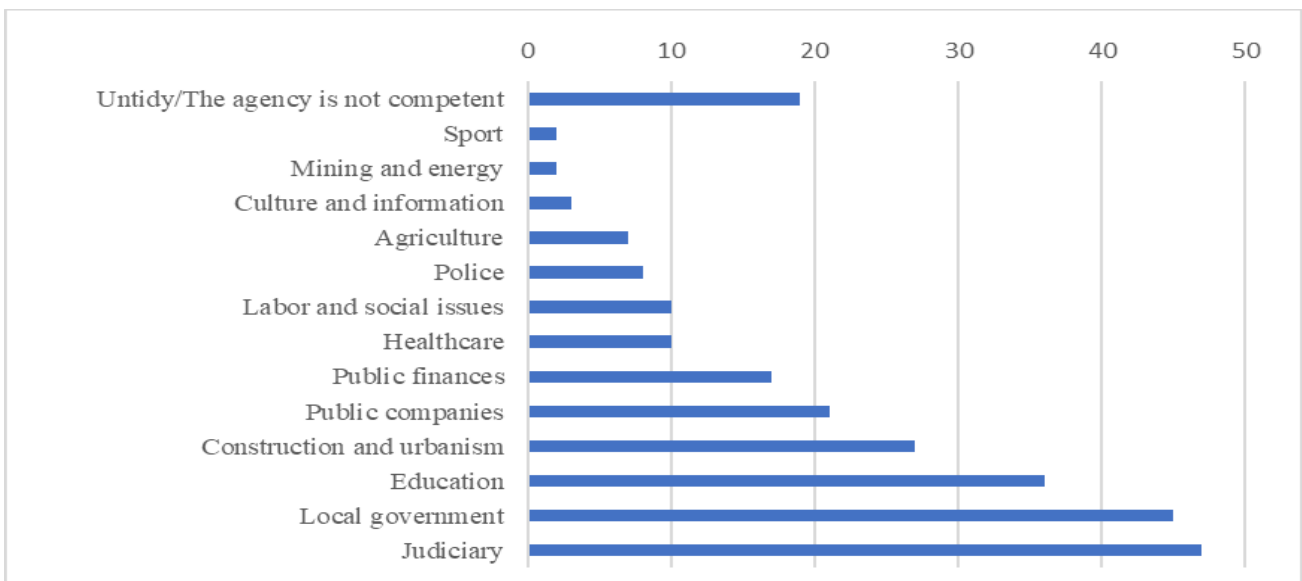
Checking the merits of the allegations, the Agency sent 374 memos to public authorities, mostly competent inspections to supervise and inform the Agency about the findings of the controlled entity, while in some cases the Agency addressed directly notified public authorities to determine the merits of the petition for the purpose of submitting documentation and giving a statement.

The Agency most often addressed the Education, Budget, Health and Administrative Inspection, the Tax Administration, the Labor Inspectorate, the Public Procurement Office, the State Audit Institution, the Chamber of Enforcement Agents, the State Attorney's Office, the Restitution Agency, and the Internal Control Sector.

In **161** cases, the Agency addressed the competent prosecutor's offices by submitting a petition for further jurisdiction and proceedings, or by requesting information on the outcome of the prosecution's actions based on petitions submitted by the Agency in the previous period. Out of the stated number of appeals, the Agency sent 73 letters to the Special Departments of the Higher Public Prosecutor's Offices dealing with the fight against corruption, and 5 letters to the Prosecutor's Office for Organized Crime.

At the end of the procedure, the Agency is obliged to inform the applicant about the outcome of the procedure. When notifying the outcome, the Agency informs the applicant about all actions taken during the handling of the application, answers received from other bodies to which it addressed during the proceedings. During the reporting period, the applicants were informed in 246 cases about the outcome of the proceedings.

Structure of submitted petitions



DEALING WITH REQUESTS FOR ACCESS TO INFORMATION OF PUBLIC IMPORTANCE AND JOURNALISTIC ISSUES

In the reporting period, the Agency received **174** requests for access to information of public importance (IPI).

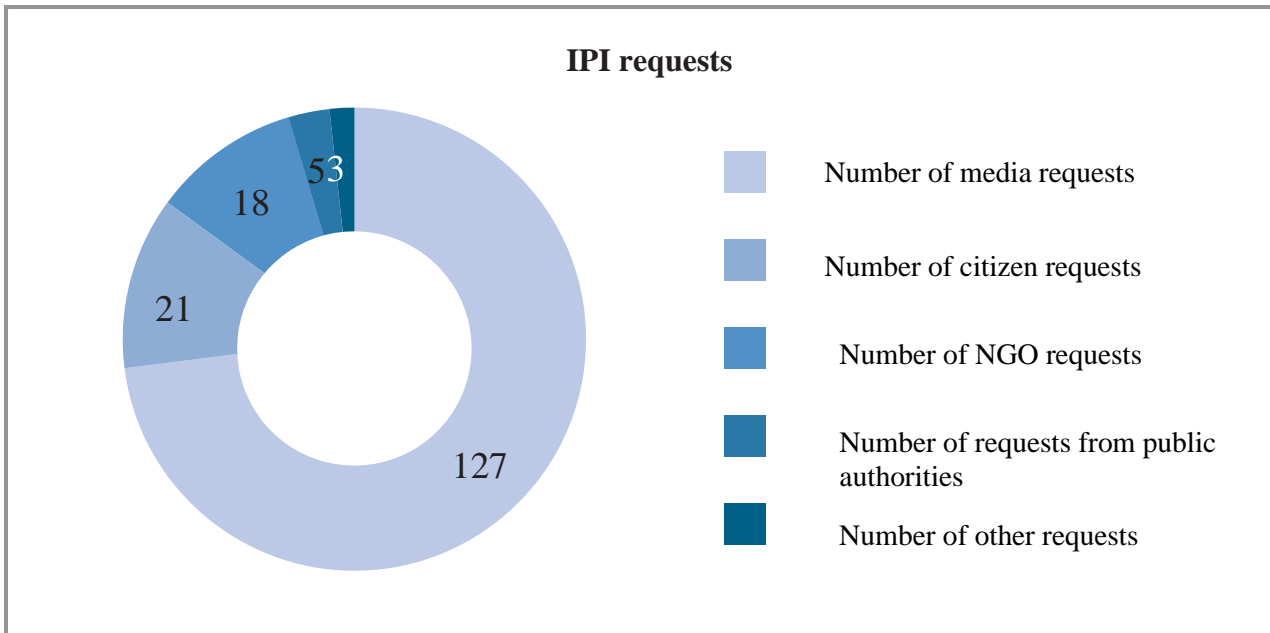
The media (**127**) sent most requests, and the Agency acted on the largest number of requests by submitting the requested information (108), i.e. 85.03% of requests, while six requests were rejected and two requests were rejected.

Out of the total number of requests, citizens sent **21**, and the Agency acted on the largest number of requests by submitting the requested information (19), i.e. 94.47% of requests, while one request was rejected.

During 2021, non-governmental organizations and other associations of citizens in **18** cases sent a request to the Agency for the provision of information of public importance, and the Agency acted on the largest number of requests by submitting requested information (16), or 88.88% of requests. the request was denied.

In the reporting period, **three** requests were submitted by the authorities, five requests remained by the applicants, and the Agency acted on all eight requests by submitting the requested information..

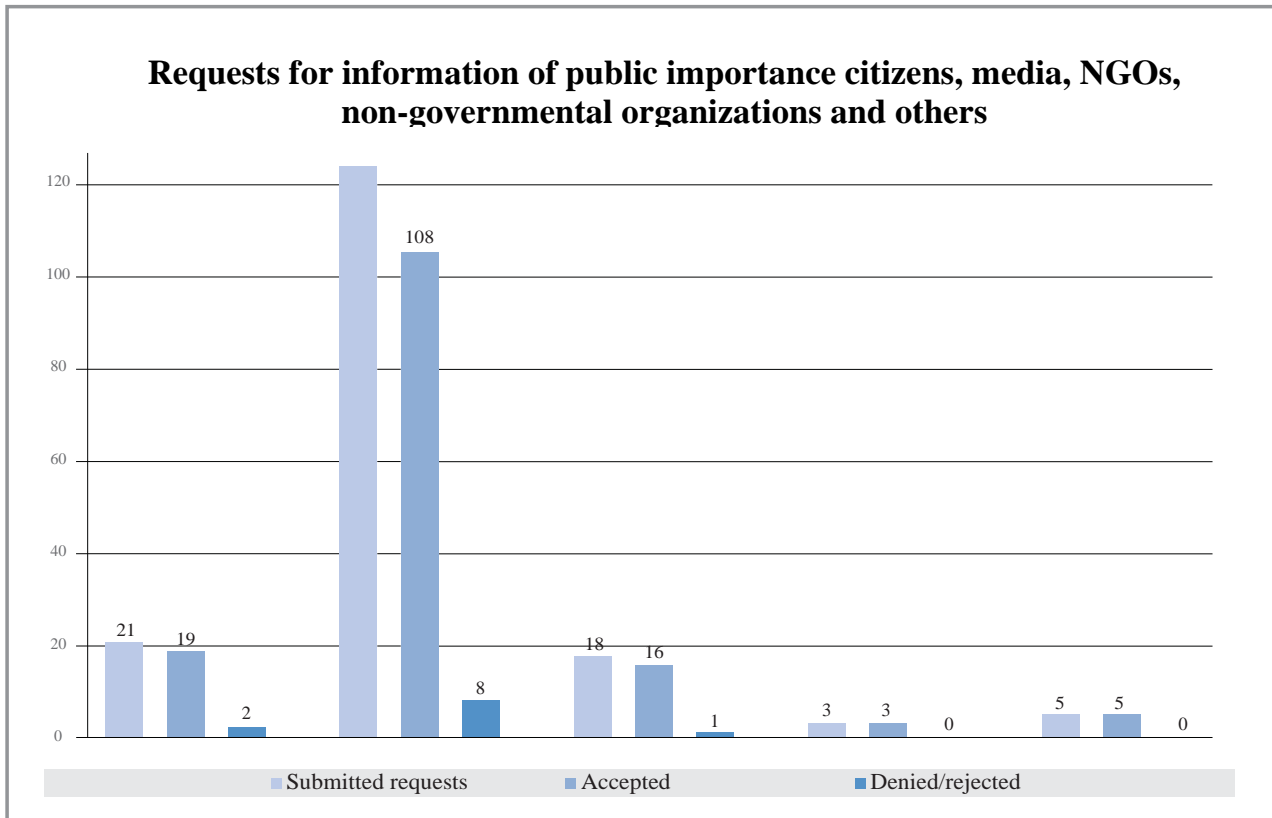
Dissatisfied parties submitted ten complaints to the Commissioner during the reporting period: four against the Agency's decision to reject the request and six complaints due to other reasons.



In the reporting period, the Agency answered 76 journalistic questions from 36 newsrooms. The largest number of questions was sent by the editorial offices of *Cins*, *Pištaljka*, *Danas*, *Nova*, *RTS*, *Kurir* and Niš's *Južne vesti*. Ten newsrooms addressed the Agency from the local level - Novi Sad's *021* and *NS live portal*, *Južne vesti*, *Niš initiative*, *Radio City Niš*, *Jugpres*, *Kolubarske*, *TV forum Prijepolje*, *Prokuplje media network* and *Žig info*. Five questions came from the regional newsrooms for the Western Balkans: *Radio Slobodna Evropa*, *Al Jazeera* and the RTV Federation of BiH.

Issues mainly concerned suspicion of reported assets or non-reporting of officials' assets and income, potential conflicts of interest, funding of political activities, and local anti-corruption plans.

In 2021, **2,627** journalistic articles about the Agency were published. Of that, **508** were positively intoned, which is 10% more than the previous year. The media that published the most articles on the work of the Agency are the portal, the print edition and Nova.rs television, and then the website and TV N1 and the newspaper Danas.



COOPERATION WITH CIVIL SOCIETY ORGANIZATIONS

The principles of cooperation with civil society are based on joint participation, trust, accountability, transparency and independence.

In its ten-year work, the Agency, in addition to general support for about **30** projects, cooperation on **15** projects and partnerships on individual projects with CSOs, conducted thirteen public competitions on the basis of which **25** projects were financed from the RS budget.

During 2021, the project from the previous year *Towards more transparency and responsibility in the decision-making process* of the BUM Bečej organization was successfully implemented. Cooperation with this association has contributed to a major shift in the work of this local self-government, which, among other things, due to these activities, for the second year in a row was declared the most transparent municipality in Serbia by LTI index. The formal completion of the project did not mark the end of cooperation with this association in the reporting period. Representatives of the Agency participated in a seminar on corruption in public finances traditionally organized by this association for public officials, while a representative of this association participated in a workshop with civil society organizations organized by the Agency in cooperation with the Ministry of Human and Minority Rights and social dialogue in September 2021.

Improving the awareness of citizens about the consequences of corruption on the situation in society was the goal of the 12th Competition for the allocation of funds, according to which the *Public Against Corruption* project of the Research Center for Defense and Security from Belgrade was ranked best. The project envisaged a series of activities aimed at increasing the level of citizen participation in preventing corruption through the development of anti-corruption awareness and familiarizing citizens with the available anti-corruption mechanisms. Through the project, in order to achieve this goal, in eleven cities across Serbia and in Belgrade, on the basis of 1,200 respondents (field survey) and 3,000 respondents (online survey), a public opinion poll on the motivation to get involved in the fight against corruption was conducted. The anonymous survey was conducted using a questionnaire method and through a random sample in public places in mapped cities (field research), as well as an online survey, conducted through an online questionnaire. A successful public opinion poll on the state of corruption provided new data on the possibilities of encouraging the public to participate more actively in preventive anti-corruption activities. After the end of the survey, processing and analysis of the collected data, which the scientific research team from the project supplemented with conclusions and recommendations for further activities, the research was presented at a press conference on November 24, 2021. at the UNS Media Center. The project drew attention to the problem of corruption and contributed to the mobilization of the work of state bodies related to the problem of corruption. The project was formally completed in the reporting period, and the Agency and the Research Center for Defense and Security implemented additional activities such as a special issue of the magazine Defense and Security dedicated to corruption and visits of final year security students at the Faculty of Business Studies and Law.

The project *Improving Integrity, Transparency and Accountability in the Municipality of Kladovo*, Bureau for Social Research BIRODI was approved financial support for 13th competition of the Agency. The aim of the project is to develop a local anti-corruption plan and a body for its implementation and monitoring in this local self-government. In support of the project, an Anti-Corruption Panel was jointly organized, presenting the experiences of institutions and civil society organizations regarding the development of local anti-corruption plans and the formation of bodies to monitor them, with reference to the situation in this area throughout Serbia. Through the experiences presented at the Panel and the knowledge gained in the previous period, support was provided to the municipality of Kladovo in drafting the best possible plan and creating conditions for its implementation. Project activities are still ongoing and are postponed to the next reporting period.

In addition to financing projects in the field of corruption prevention, the Agency participated in the Working Group and actively contributed to the development of the Strategy for Creating a Stimulating Environment for Civil Society Development, coordinated by the Ministry of Human and Minority Rights and Social Dialogue.

In cooperation with the Ministry of Human and Minority Rights and Social Dialogue, the Agency organized a consultative meeting “How to More Effective Civil Society Participation in the Fight against Corruption” with civil society organizations that are active in the field of preventing corruption. The meeting was organized in order to present to the participants the work of the Agency in the field of cooperation with civil society organizations, to define areas for future cooperation through exchange of views and consider possible cooperation mechanisms, as well as activities and plans of the Ministry of Human and Minority Rights and Social Dialogue within the framework of the Negotiating Chapter 23.

The Agency accepted the invitation and actively participated in the first session of the National Dialogue on Resistance to Organized Crime and Corruption in Serbia, held in Belgrade in December 2021, organized by the Global Initiative - a platform of more than 500 experts from around the world.

12.

**INTERNATIONAL
COOPERATION**

- The one-year chairmanship of the Agency's Global Network of Institutions for the Prevention of Corruption (*NCPA*) was successfully completed;
- Membership in the European Network of Institutions with a Register of Lobbyists (*ELRN*) was initiated and achieved;

In 2018, the agency was among the founders of the *NCPA*, at the invitation of the National Anti-Corruption Agency of Italy, and before the election for president, for two years in a row, she was one of the vice presidents. During the **Agency's chairmanship**, the *NCPA* was joined by the National Anti-Corruption Agency of Ukraine - as a member and the Regional Anti-Corruption Initiative - as a partner, so that the *NCPA* brings together 31 members, five partners and one observer institution.

Members, partners and observers of the *NCPA* unanimously assessed the Presidency of the Agency as extremely successful, during which the Agency, among other things, conducted the procedure of amending the internal acts of the *NCPA*, fully managed and coordinated the work of the *NCPA*, organized three plenary sessions, participated in numerous joint projects. making an analysis of the current state of the *NCPA*, with the aim of defining future strategic directions and drafting the *NCPA* Strategic Plan.

During the presidency of the Agency, the *NCPA* was also a co-organizer of events on the sidelines of the Ninth Session of the Conference of the Parties to the UN Convention against Corruption, in cooperation with the National Anti-Corruption Agency of Italy. The event was dedicated to the challenges and opportunities of information technology in preventing and detecting corruption, as well as strengthening integrity and transparency, when a publication on this topic, prepared by *NCPA* members, was presented.

The Agency organized and conducted the elections for the new President and Vice-Presidents in 2022, in which the National Transparency Institution of Greece was elected President, and the Vice-Presidents are members of the Network from Croatia, Morocco, and Palestine.

During 2021, in addition to joint projects with other members, the Agency participated in weekly information sessions, as part of a project led by an *NCPA* member from Ecuador. Topics included drafting, implementing and monitoring the implementation of national anti-corruption strategies, assessing the risk of corruption in regulations, auditing the public sector, reporting and verifying the assets of officials, resolving conflicts of interest and protecting whistleblowers. In addition to Ecuador and Serbia, the project included members from Moldova, Tunisia, Romania, France, Palestine, Canada, Chile, Georgia and Croatia, and the preparation of a publication resulting from information sessions is underway.

In the past year, the Agency initiated and realized its membership, and then participated in the annual conference of the **European Network of Institutions, which have a Register of Lobbyists (*ELRN*)**. This initiative was established with the aim of exchanging experiences and good practices in the application of lobbying regulations, and consists of: Austria, Finland, France, Ireland, Lithuania, Scotland, Slovenia, Spain, the United Kingdom and the European Union.

The most significant participations of the Agency's representatives in international conferences and sessions are those organized by the UN Office on Drugs and Crime (*UNODC*), the Secretariat of the Organization for Security and Cooperation in Europe (*OSCE*), the Anti-Corruption Network of the Organization for Economic Co-operation and Development (*ACN/OECD*), European Anti-Corruption Partners/European Anti-Corruption Contact Network (*EPAC/EACN*), World Bank, Council of Europe, International Foundation for Electoral Systems (*IFES*), Regional Anti-Corruption Initiative (*RAI*), as bilateral partners.

As part of the **Fourth Evaluation Round of the Council of Europe's Group of States against Corruption (*GRECO*)**, which includes preventing corruption against MPs, judges and prosecutors, the Agency, headed by the Head of Delegation, contributed to joint efforts of relevant state institutions to comply with international standards in these areas, cooperating intensively with the Prime Minister's Office and the Ministry of Justice, as well as other relevant institutions. In accordance with the set deadline, the Republic of Serbia submitted a report on compliance with the recommendations from the Fourth Round of Evaluation on October 29, 2021.

Within the **Fifth Round of *GRECO*** evaluation, which refers to the prevention of corruption and improvement of integrity in central bodies of state administration - the highest executive functions and law enforcement agencies, in 2021 the *GRECO* evaluation team visited, and representatives of the Agency participated in the meetings. 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.

As part of the annual reporting cycle on the **implementation of the UN Convention against Corruption (*UNCAC*)**, the Agency last year prepared an article on the role of state audit institutions and national parliaments in the implementation of *UNCAC*, in cooperation with the State Audit Institution and the National Assembly. At the 12th session of the *UNODC* Intergovernmental Working Group on Prevention of Corruption, and a representative of the Agency, she was a panelist at the joint session of the Intergovernmental Working Group on Prevention of Corruption and the *UNCAC* Monitoring Group on technical assistance in implementing and improving *UNCAC* implementation.

In 2021, the **Ninth Session of the Conference of the Parties to the *UNCAC*** was held, which was attended by representatives of the Agency, as part of the delegation of the Republic of Serbia, in principle with the Ministry of Justice. As the most important body when it comes to the implementation of *UNCAC*, the Conference was established with the aim of improving the capacity of member states, strengthening cooperation in fulfilling goals, promoting and efforts related to the implementation of this document, and convened once every two years.

Adopted by the National Coordinator of the **Anti-Corruption Network of the Organization for Economic Co-operation and Development (*ACN/OECD*)**, in cooperation with relevant national actors, the Agency worked on implementing activities related to meetings of working bodies

implementation of the Istanbul Anti-Corruption Action Plan¹³, improvement of integrity in the private sector, as well as the development of the Methodology of the Matrix of High Corruption Cases, in cooperation with the Ministry of Interior and the Republic Public Prosecutor's Office.

Within the OECD, the Agency was involved in the preparation of the South East Europe Competitiveness Report 2021, the Multidimensional Review of the Western Balkans, the prevention of corruption, and the implementation of activities under the “Fair Market Conditions for Competitiveness Project”.

In addition to improving the already existing cooperation with numerous institutions for the prevention and fight against corruption at the bilateral level, in 2021, the Agency established communication and cooperation with new anti-corruption institutions. Meetings were held at the highest level with representatives of the Commission for the Fight against Corruption and Confiscation of Illegally Acquired Property of Bulgaria, the National Anti-Corruption Agency of Italy and the National Anti-Corruption Agency of Ukraine. For the first time, co-operation has been established with the Irish Public Administration Standards Commission, and co-operation with the High Institution for Transparency in French Public Life has been deepened, also in the field of lobbying, as well as relevant bodies, Croatia, Estonia, Slovakia and Denmark (an international lobbying workshop was held with the support of the OSCE Mission). The study visit of the representatives of the Commission for Deciding on Conflicts of Interest to Croatia was also successfully realized.

Since 2020, the Agency has been actively involved in the Supervisory Board of the Berlin Process for fulfilling obligations in the field of security, when the first meeting was held. The second meeting was held in 2021, and then the Agency actively participated in the development of the **Roadmap for the Fight against Corruption and Illegal Financial Flows**, which was adopted in Ohrid in 2021, in cooperation with *UNODC* and *RAI*.

At the invitation of the National Assembly, representatives of the Agency participated in the constitutive meeting of the National Branch of the Global Organization of Parliamentarians against Corruption (*GOPAC*).

¹³ The Istanbul Anti-Corruption Action Plan is a peer review program that has been operating within the ACN/OECD since 2003. It focuses on reforms in the fight against corruption through state evaluation and oversight of the implementation of recommendations, which promote the standards, set by the UN Convention against Corruption and other international instruments and examples of good practice.

INTERNATIONAL PROJECTS

- Through international non-donor assistance, the Agency's capacities are strengthened, both in the implementation of entrusted responsibilities and in developing the skills of employees;
- The preconditions for the integration of gender-responsive measures in the Agency's work and the improvement of gender policy have been achieved;

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

Within the IPA 2013 Project "Prevention and Fight against Corruption", which was completed in 2021, the Agency was supported in the development of the Methodology for assessing the impact of measures taken to reduce corruption in eight risky areas, as well as strengthening the capacity of the area of integrity plans and acting on complaints.

Improving cooperation with prosecutors, strengthening analytical and research capacities, drafting a new edition of the Manual for Recognizing and Managing Conflicts of Interest and Incompatibility of Functions and Workshops with Officials, creating tutorials on the application of the Methodologies for monitoring the implementation of local anti-corruption plans, some activities supported by the USAID Responsible Authority Project (USAIDGAI).

The OSCE Mission to Serbia provided significant support to the Agency, including the holding of workshops on lobbying at the national and international levels, development of a Methodology for assessing the effects of the Law on Prevention of Corruption, further capacity building in the field of corruption risk assessment, providing software licenses for analytical IBM i2 tool in the field of asset verification and control of financing of political activities, improvement of the Agency's Internet presentation, strengthening of employees' skills, as well as organization of an international conference on the occasion of December 9, International Anti-Corruption Day¹⁴.

Thanks to the systematic support of the OSCE Mission and the proactive approach of the Agency, the preconditions for the integration of gender-responsive measures within the Agency and the improvement of gender policy have been achieved. Employees attended a series of trainings on the relationship between preventing corruption and responsible measures to highlight the links, as well as the Handbook for Introducing Gender Perspectives, Measuring Progress and Improving Gender Equality through the Agency, with the aim of incorporating the developed tool into the daily work of all organizational units. The Agency's pioneering endeavor in this area was also presented at the OSCE Economic and Environmental Dimension Implementation Meeting, held as part of the Swedish presidency of the organization, when the Agency presented efforts within a panel dedicated to promoting full and equal participation in anti-corruption activities.

Dedicated to the involvement of young people and raising their awareness of the causes and seriousness of corruption, the Agency, after successfully conducting an internship program for young professionals from southwestern Serbia in 2019 and 2020, organized by the OSCE Mission in 2021,

¹⁴ See further on page 81

for a period of six months, the selected intern was enabled to acquire knowledge and insight into the competencies of the mechanism that is applied to prevent corruption.

Cooperation with the International Foundation for Electoral Systems (**IFES**) was successfully continued through activities aimed at strengthening the capacity of employees in the field of control over the financing of political activities, as well as the development of guidance and training in this domain.

The support through the **World Bank Initiative for Improving Transparency and Accountability in Serbia** is reflected in the planned activities of drafting the Model Code of Conduct for Public Officials with guidelines for its implementation, as well as establishing a practice and drafting a procedure to ensure that the Agency regularly publishes data on its recommendations. The Agency was also presented at the plenary session of this initiative within the panel dedicated to integrity and responsibility in public administration. The initiative covers thematic areas related to fiscal transparency, proactive transparency and strengthening accountability, and consists of representatives of state institutions, civil society organizations, the business community, and international development partners.

The Agency is also involved in the **Council of Europe Project "Prevention of Money Laundering and Terrorist Financing in Serbia"**, with the support of the Swedish International Development Agency (*SIDA*), through training activities for Agency staff to use IBM i2 analytical tools activities, as well as workshops and recommendations of Council of Europe experts aimed at improving inter-institutional cooperation and efficient verification of public officials' property.

The Regional Program "Southeast Europe - Together against Corruption" *RAI* and *UNODC*, with the support of the Austrian Development Agency (*ADA*), is also one of the initiatives in which the Agency actively participates in the field of general corruption risk assessment and corruption risk assessment.

The programs of professional development of employees include trainings, which were organized in 2021 by the International Anti-Corruption Academy (*IACA*) and the Commission for the Fight against Corruption and the Civil Rights of the Republic of Korea.

When it comes to **programming international aid funds**, the Agency continuously participates in the sectoral working groups for programming and coordination of *IPA* funds and other development aid for the justice, home affairs and public administration reform sectors, as well as in the preparation of accompanying documents. In the past year, it contributed to the relevant sectoral working groups for *IPA III* programming (*IPA 2021/2022*), as well as the so-called "Flexible Facility" Program (*IPA 2019*), in cooperation with the Ministry of European Integration and the Ministry of Justice.

In 2021, the Agency actively contributed to the network for combating irregularities and fraud in dealing with European Union funds, which is managed by the Ministry of Finance. In 2021, the development of a new **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. The proposed activities of the Agency were accepted and included in the final text of the Strategic Plan, which was adopted on October 21, 2021.

13.

**CORRUPTION
RESEARCH**

- **Research on the perception of students at the University of Belgrade about the state of corruption at the University**

The aim of the research was to determine the level of familiarity of students at the University of Belgrade with the phenomenon of corruption in general, the degree of comprehensive perception of the existence of corruption at the University, as well as specific observations of students on possible directions and aspects of permanent action to prevent corruption in higher education.

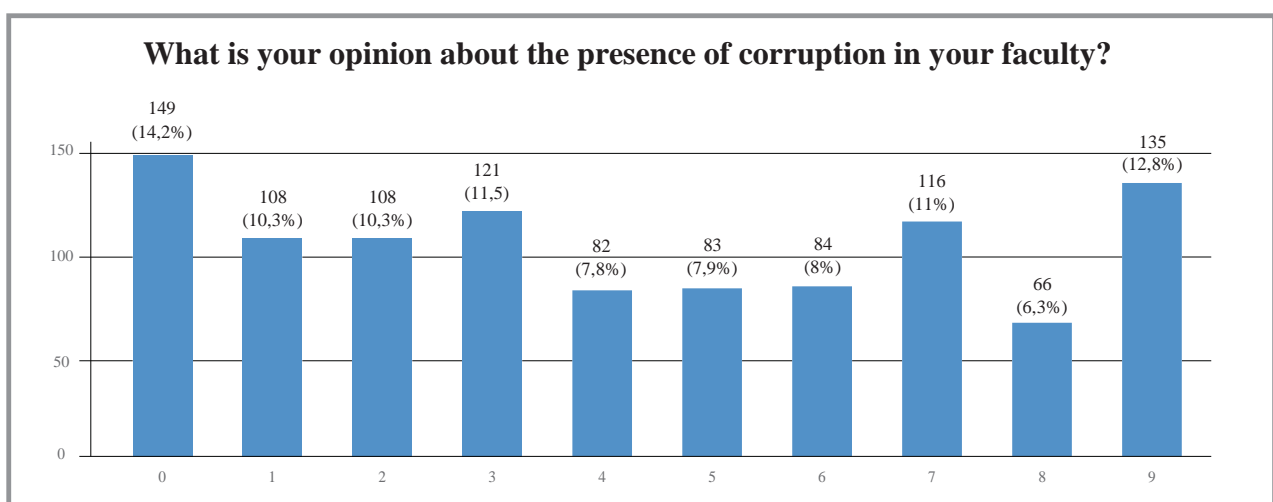
Further research involves systematic labeling, based on street experiences of female students, all aspects and forms of corruption that occur at the University of Belgrade.

The long-term goal is to review the situation regarding risk factors for corruption at the University of Belgrade, so that steps in preventing corruption, not only at the University of Belgrade, but also at other higher education institutions in the Republic, are properly aimed at reducing existing risk factors. towards strengthening the integrity of University employees and students as an important protective factor in further preventing corruption in the field of higher education. In addition, the research aimed to specify the position and importance of the Agency in the process of preventing corruption in higher education as a segment of public life in Serbia.

Taking into account the need to represent the faculties of all scientific fields: social-humanistic, medical, technical-technological, and natural-mathematical sciences, the research was conducted among the students of the six faculties of the University of Belgrade (Faculty of Law, Faculty of Philosophy, Faculty of Political Science, Faculty of Medicine, Faculty of Organizational Sciences and Faculty of Mathematics).

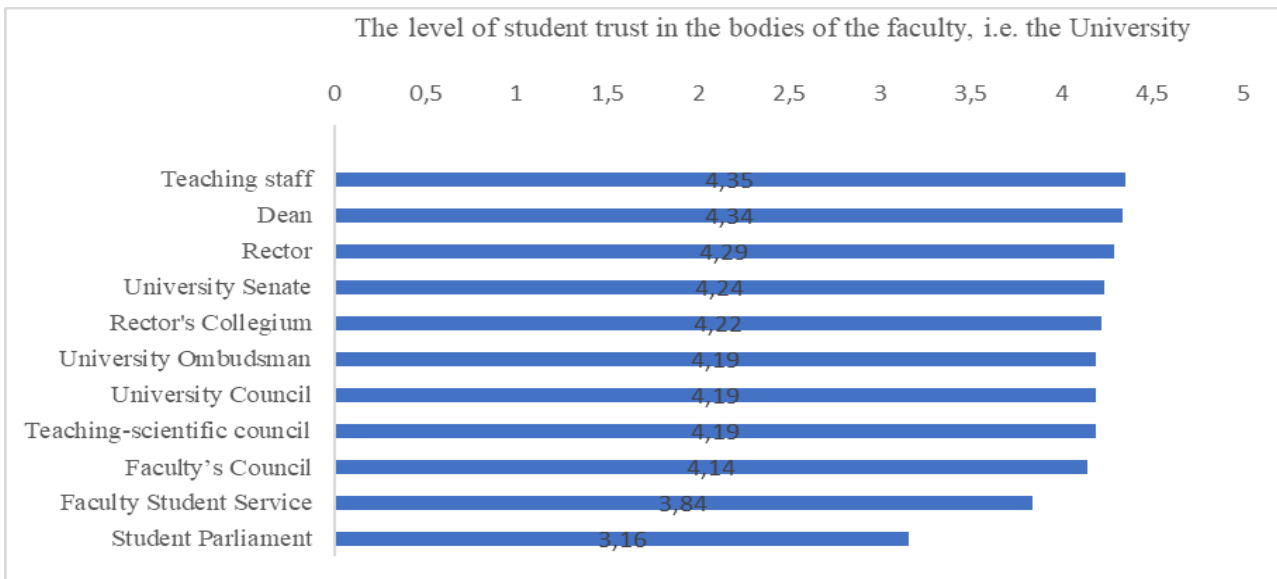
The research was realized in the period from the beginning of October to the end of December 2021, in cooperation of the Agency with the administrations of the mentioned faculties, and with the advisory support of the Institute of Social Sciences in Belgrade. 1052 students of all years of study participated in the survey.

The predominant number of surveyed students expressed the opinion that corruption, both at the faculties of their studies, and at the entire University, exists and is widespread in various ranges and intensities.



From the analyzed results, it can be noticed that over 3/4 of the surveyed students heard about a student who passed the exam with a bribe, earned a diploma or achieved some other benefit while studying at the university, while 83.5% of the sample knew the student personally. a student who has passed the exam at a faculty of the University in another illegal way - by copying, using bugs, by having another person take the exam.

The results obtained in response to the question "would the surveyed students report corrupt behavior at their faculty in the future", show us that 55.7% of them would report future corrupt behavior. At the same time, it is important to point out that as many as 56.3% of students, who declared themselves to whom they would report corruption, indicated the Agency for Prevention of Corruption as the body submitting the report, which indicates the level of trust of the surveyed students.



- **Analysis of the role of individual bodies and organizations in the fight against corruption**

The subject of the analysis is the role of specialized bodies in the fight against corruption.

The responsibilities of the bodies of specialized anti-corruption bodies are considered, primarily the Agency for Prevention of Corruption, whose position, competence, organization and work are regulated by the Law on Prevention of Corruption, but also special departments for combating corruption in some higher public prosecutor's offices, and the competence is regulated by the Law on the Organization and Competence of State Bodies in the Suppression of Organized Crime, Terrorism and Corruption.

The role of the Anti-Corruption Agency is primarily of a preventive nature and is reflected in the activities that should prevent the emergence of corruption, but also in certain activities that can initiate the initiation of repressive mechanisms. In addition, the Agency cooperates with repressive bodies, which additionally contributes to the creation of anti-corruption

framework, which will serve the citizens and strengthen their trust in the work and integrity of the institutions they represent.

Through the given analysis, the issue of cooperation of competent bodies with other bodies was considered. Cooperation of bodies mainly implies undertaking activities determined by relevant laws, but it is also realized based on basis of agreements on cooperation that bodies conclude with each other. These agreements specify the subject and manner of cooperation, in order for all bodies to achieve the best possible results in performing tasks within their competence. The Agency has concluded several such agreements so far, and the most significant ones have been singled out through analysis.

At the end of the analysis, an overview of the results of the work of both the Agency and special departments of higher public prosecutor's offices, courts and the Ministry of the Interior is given, according to data for 2019.

- **Analysis of international practices in the integration of gender perspectives in the field of anti-corruption**

Gender Mainstreaming - that women and men have equal rights and opportunities to realize their individual potentials, but also to be equally visible in empowerment and participation in all spheres of public and private life, is one of the key goals of every modern society. The mentioned analysis deals with the aspects of corruption in relation to the natural dimension and the possible connection between them.

The analysis, in addition to observations in the field of gender equality in the Republic of Serbia, also includes legislative frameworks and experiences from practice, primarily countries in the region - Montenegro, Bosnia and Herzegovina, Northern Macedonia, Croatia and Slovenia. An analysis of the current situation in these countries shows that in the last decade there have been numerous concerns in the field of gender perspective, which are relevant as an expression of intensive efforts to strengthen democratic development.

The connection between gender inequality and corruption is reflected in the fact that both have the potential to slow down the development of society, thus affecting the increase in poverty. In this sense, corruption is a major obstacle to women in their efforts to achieve full access to their civil, social and economic rights.

Generally speaking, in all countries subject to analysis, the notion of gender equality is contained in certain laws and bylaws, government strategies and action plans. All countries involved are continuously moving towards a gender balanced society and in order to raise awareness in the field of gender equality organize numerous workshops and trainings, strive to develop their national plans and strategies, but at the same time try to closely monitor the situation on gender mainstreaming in EU countries.

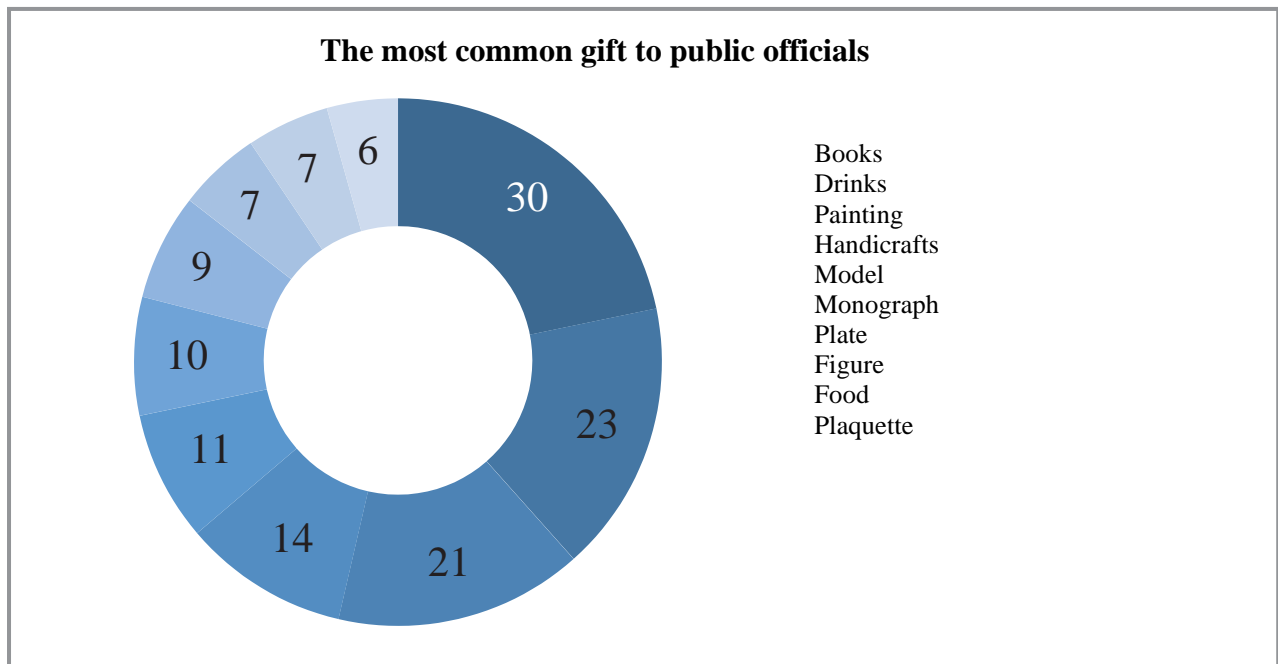
- **Statistical analysis of the Gift Catalogue for 2020**

The analysis deals with statistical processing of data from the Gift Catalogue, taking into account its most important elements, as well as their comparison in relation to previous years. The Law on Prevention of Corruption defines the notion of a gift and it can be a thing, a right or a service, given or done without appropriate compensation, or a benefit or convenience done to a public official or family member. The law distinguishes between two types of gifts that a public official or family member may receive in connection with the performance of a public function, and these are protocol and occasional gifts.

Bearing in mind that the Gift Catalogue in 2020 does not contain data on the donor, the Statistical Analysis of the Gift Catalogue in 2020 differs somewhat in content from the same analyzes made in previous years. The reason for that is Article 63 of the said law, which stipulates that the records of gifts kept by a public authority, which are submitted to the Agency, do not contain data on the donor, which is an important difference in relation to the previous legal solution. Accordingly, the Statistical Analysis of the Gift Catalogue for 2020 includes the following: number of gifts by year, number of gifts by type, gift property, share of gifts by government, division of gifts by ownership regime, relationship of function and ownership of gifts, overview of donor countries, and list of public officials.

A significant change in the law is reflected in the fact that a public official and a family member have the right to keep a protocol or occasional gift whose value does not exceed 10% of the average monthly salary without taxes and contributions in the Republic of Serbia, while the previous law was 5%.

During 2020, public officials received more protocol (160) than occasional gifts (50). A small number of gifts were retained in personal ownership (45), while 165 gifts were transferred to public ownership. Only 24 bodies of all levels of public government submitted gift records to the Agency, which is significantly less than in previous years. The value of the gifts ranges from 650.00 to 800,000.00 dinars, while for 14 gifts the assessment of the monetary value was not performed until the analysis was made.



Based on the indicators from this analysis, it can be concluded that the number of reports received during 2020 was caused by the pandemic coronavirus, which was declared in the Republic of Serbia on March 6, 2020, which affected the reduction of protocol and occasional meetings.

The characteristic conclusions related to this analysis can be seen at: <https://www.acas.rs/wp-content/uploads/2021/06/Statisticka-analiza-Kataloga-poklona-u-2020.-godini-1.pdf>.

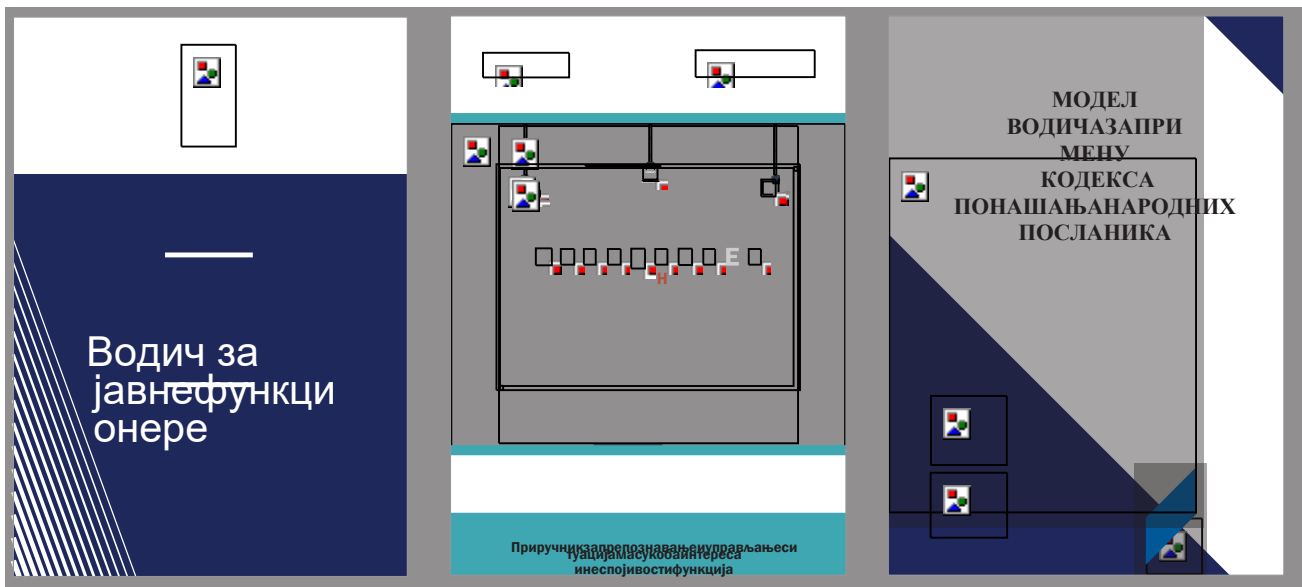
14.

PUBLICATIONS AND PROMOTIONAL ACTIVITIES

During the reporting period, the Agency produced several publications (of which some of the reports already mentioned) which promote the responsible behavior of public officials in the performance of obligations to the Agency and indicate the harmfulness of corruption.

The Practical Guide for Public Officials, harmonized with the new legal provisions, was published in 2021 and made available to public officials at the national and local level, while it was highlighted as an electronic publication on the Agency's website.

In collaboration with the **USAID Project on Responsible Authority**, a **handbook for recognizing and managing situations of conflict of interest and incompatibility of functions**. This manual is primarily intended for all public officials in the Republic of Serbia, but also for all those who want to understand the concept of conflict of interest and incompatibility of functions of public officials and all possibilities and prohibitions in performing the function of elected, appointed or appointed persons in public authorities.



In addition to printed publications, the Agency has developed useful video instructions, so in cooperation with the *USAID* Project for Responsible Government, a **video manual on monitoring the implementation of the Local Anti-Corruption Plan and reporting on its implementation has been published.**

To support public authorities in the process of drafting the Integrity Plan, a **video guide for the working group** was published with instructions on how to identify risky work processes and risks or circumstances conducive to corruption.

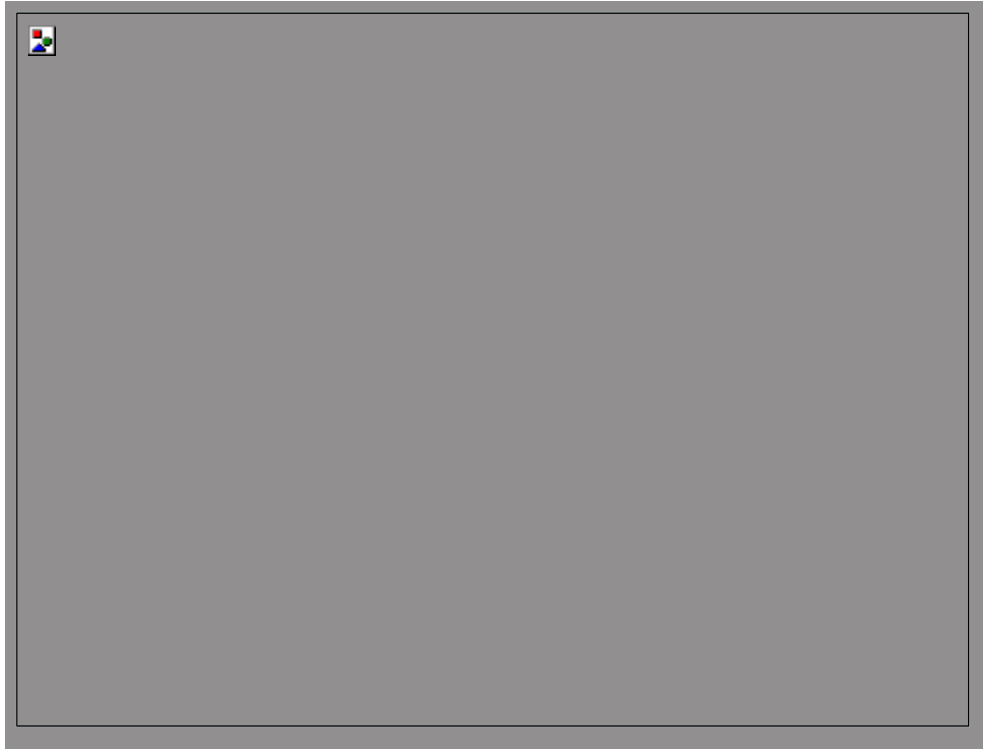
In order to support and strengthen the integrity of all participants in lobbying activities and to ensure that the process takes place in the manner prescribed by the Law on Lobbying, an **animated educational film** was made. In a very interesting way, the public, and above all potential participants in the lobbying, can be acquainted with the basic concepts and commitments.

The special issue of the magazine *Defense and Security*, dedicated to corruption, created because of cooperation with the organization of civil society, enabled the widest readership to be acquainted with all the competencies of the Agency.

The agency conducted a campaign called "**Functions without Corruption**", whose goal is to improve public awareness of the importance of preventing corruption in the Republic of Serbia. With this campaign, the Agency wanted to achieve a better understanding of their competencies among citizens, as well as to get to know their legal decisions.

By broadcasting the video with the message "Functions without corruption" on televisions with national coverage, and placing digital content on Internet portals, she pointed out the importance of protecting the public interest and preventing corruption as a harmful phenomenon that directly affects the quality of life. She called on the citizens to be acquainted with the preventive solutions and mechanisms that he establishes and develops, and on the public authorities to implement these mechanisms.

During the campaign, in the period from October 10 to November 10, 2021, the employees of the Agency, together with the representatives of the local self-government, civil sector media, reviewed and carried out activities aimed at preventing corruption in local environments.



15.

**INTERNATIONAL
ANTI-CORRUPTION
DAY**

The United Nations Convention against Corruption in 2003 established December 9 as the International Day against Corruption - a day dedicated to raising public awareness of the harms and dangers that corruption poses to the economic and political stability of society.

Traditionally, the Agency has celebrated this with the gathering of domestic foreign partners, representatives of the media and civil society as current events.

The Agency marked the International Day with the International Conference on **Gender Policy as a Necessity or Opportunity - a policy of equal opportunities towards more efficient prevention of corruption.**

After the conference, the importance of systematically including the national perspective in the application of anti-corruption mechanisms was emphasized, as well as the continuous commitment to the implementation of gender measures through the work of the Agency. Mechanisms for introducing a gender perspective in the Agency were presented, developed with expert assistance, in cooperation with the OSCE Mission to Serbia.

The conference was attended by more than 100 participants addressed by: Ambassador Jan Bratu, Head of the OSCE Mission to Serbia, Anita Ramasastrri, Special Representative for Combating Corruption of the Swedish OSCE Chairmanship, Brankica Janković, Commissioner for Equality of the Republic of Serbia, Milana Rikanović, Director of Women's Rights (*UN Women*), Gordana Čomić, Minister of Human and Minority Rights and Social Dialogue of the Government of the Republic of Serbia and Maja Popović, Minister of Justice of the Government of the Republic of Serbia.

At the end of the report, instead of concluding, the Agency recalls one of the provisions of the United Nations Convention against Corruption:

"Each Contracting State, in accordance with the basic principles of its legal system, shall develop and implement or maintain an effective, coordinated anti-corruption policy which promotes public participation and reflects the principles of the rule of law, good governance, integrity, transparency and accountability."

16.

TABULAR VIEW

STRUCTURE OF FIRST INSTANCE DECISIONS (CONFIRMED BEFORE THE AGENCY BOARD)

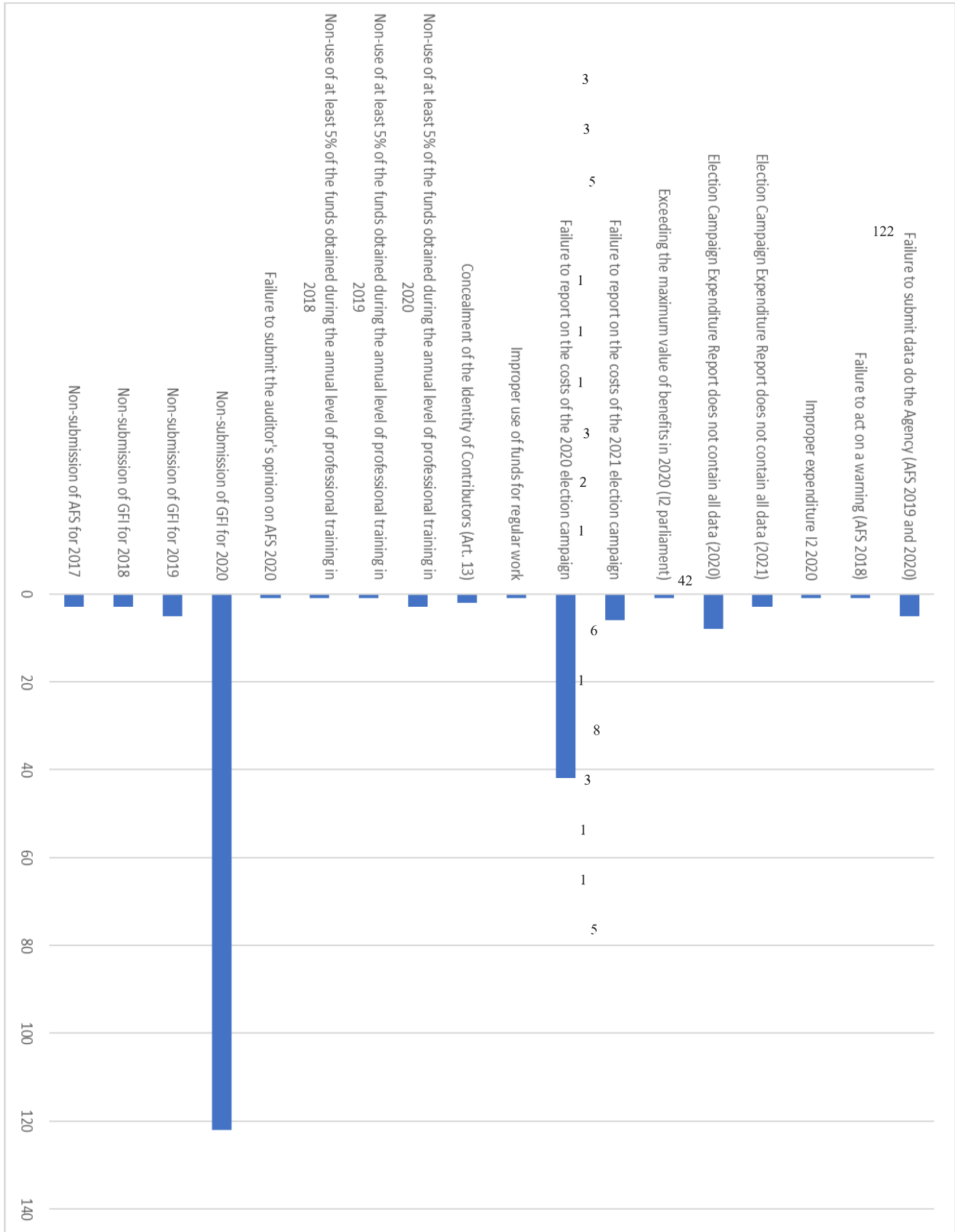
Public office		Structure of first instance decisions (confirmed before the Agency Board)		Decision of the Administrative Court
		Violation of the law was determined/other decision	Measure imposed	
1.	Director of Healthcare Centre	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
2.	District Chief	Decision rejecting the request for approval of other public functions of the members of the Faculty Council	-	Judgment rejecting the appeal
3.	President of the Supervisory Board of the public utility company	The decision which determines that the public functionary did not act in accordance with the imposed measure of warning and ceased and stopped performing the job of the head of the department in the city administration at the same time	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
4.	Member of the Municipal Assembly	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency due to the simultaneous holding of public office and duties of a member of the local community council in the same municipality.	The warning measure ceases at the same time as the public function of the future	Judgment rejecting the appeal
5.	Former Municipal President	Decision determining the violation of Art. 27 and 32, paragraph 1. of Law on the Agency (by the decision of the health center whose founder is the municipal assembly, the public official was awarded specialization and concluded a contract on professional training and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
6.	Director of Technical College for Vocational Studies	Decision determining the violation of Art. 28, paragraph 4. of the Law on the Agency because the functionary without the consent of the Agency performed another public function of a member of the City Assembly	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
7.	President of the Board of Directors of the Gerontology Center	Decision rejecting the request for giving consent for the completion of another public function because it was not submitted in a timely manner	-	Judgment rejecting the appeal

Public office		Structure of first instance decisions (confirmed before the Agency Board)		Decision of the Administrative Court
		Violation of the law was determined/other decision	Measure imposed	
8.	Member of the Municipal Council	Decision determining the violation of Art. 31. paragraph 1, Art. 35, paragraph 1. and Art. 27 and 32, paragraph 1. Law on the Agency (failure to notify the Agency on the performance of other work; non-transfer of management rights in the company owned by it; by the municipality of Žabalj to a public official leased state-owned agricultural land and failure to notify the Agency of conflict of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
9.	Member of the Municipal Council	Decision determining the violation of Art. 31. paragraph 1. and Art. 27 and 32, paragraph 1. Law on the Agency (failure to inform the Agency on the performance of other work, nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
10.	Former Protector of Citizens	Decision rejecting the request for giving consent for establishing business cooperation with a legal entity	-	Judgment rejecting the appeal
11.	Director of the Center for Social Work	Decision determining the violation of Art. 27. and 32, paragraph 1. Law on the Agency (nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
12.	Dean of the Faculty	Decision determining the violation of Art. 27. and 32, paragraph 1. Law on the Agency (nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
13.	Primary school principal	Decision determining the violation of Art. 27. and 32, paragraph 1. Law on the Agency (nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
14.	Judge of the Court of Appeal	Decision determining the violation of Art. 44, paragraph 1. Law on the Agency (reporting significant changes in data from the report on property and income with a delay)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal

15.	Director of the Institute	Decision determining the violation of Art. 27. and 32, paragraph 1. Law on the Agency (nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
16.	Acting Director of the Clinical Center	Decision determining the violation of Art. 27. and 32, paragraph 1. Law on the Agency (nepotism and failure to inform the Agency on conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal

Public office		Structure of first instance decisions (confirmed before the Agency Board)		Decision of the Administrative Court
		Violation of the law was determined/other decision	Measure imposed	
17.	City Attorney	Decision rejecting the request for approval of the performance of another public function of the liquidation manager of the public company	-	Judgment rejecting the appeal
18.	City Attorney	Decision rejecting the request for approval of the performance of another public function of the liquidation manager of the public company	-	Judgment rejecting the appeal
19.	Member and Deputy Chairman of the Board of Directors	Decision determining the violation of Art. 28, paragraph 4. of the Law on the Agency because he is a functionary without the consent of the Agency performed another public function of a member of the board of directors of the museum	Termination of other public office by force of law	Judgment rejecting the appeal
20.	Head of the City Municipality Administration	Decision rejecting the request for giving consent to the performance of the second public function of the deputy member of the city election commission	-	Judgment rejecting the appeal
21.	Mayor	Decision determining the violation of Art. 28, paragraph 4. of the Law on the Agency because the official without the consent of the Agency performed another public function of the President of the Assembly of the company	Termination of other public office by force of law	Judgment rejecting the appeal
22.	Former councilor	Decision determining the violation of Article 27 and 32, paragraph 1. Law on the Agency (in the capacity of a lawyer before the court he represented the employees in the primary school and the payment of travel expenses financed from the municipal budget and notifying the Agency of conflicts of interest)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
23.	Director of the Electrical Engineering School	Decision determining the violation of Art. 28, Paragraph 4, Art. 27, paragraph 2 and 3 of the Law on the Agency (simultaneous performance of several public functions without the consent of the Agency)	The precautionary measure will cease at the same time as the term of office of the Rector and the President will continue to comply with the law in the future.	Judgment rejecting the appeal

GROUND FOR FILING MISDEMEANOR CHARGES AGAINST POLITICAL ENTITIES



AGENCY BUDGET IN 2021

Execution for the period January 01 – December 31, 2021 Program activity 0007, Prevention of corruption and control in the function of preventing corruption. Source 01.	
Economic classification	AMOUNT
411000 - Salaries, allowances and employee benefits	160.322.032,28
412000 - Social contributions charged to the employer	26.466.944,39
413000 - Compensation in kind	656.500,00
414000 - Social benefits to employees	345.893,02
415000 - Employee cost compensation	3.267.652,38
416000 - Compensation of employees and other special expenses	819.947,29
421000 - Other expenses	4.474.266,54
422000 - Travel expenses	780.764,08
423000 - Contractual services	28.728.629,74
424000 - Specialized services	164.400,00
425000 - Regular repairs and maintenance	3.050.975,24
426000 - Material	1.767.056,69
482000 - Taxes, obligatory fees and penalties decided by the courts	44.792,00
511000 - Expenditure on non-financial assets – buildings	10.811.397,20
512000 - Machinery and equipment	31.562.712,00
515000 - Intangible assets	3.322.350,00
TOTAL:	276.586.312,85

Execution for the period January 01 – December 31, 2021 Project 4007, Grants to civil society organizations (CSOs) for projects in the field of anti-corruption and coordination meetings. Source 01.	
Economic classification	AMOUNT
481000 - Grants to non-governmental organizations	2.000.000,00
TOTAL:	2.000.000,00

Execution for the period January 01 – December 31, 2021 Project 4004 – Raising public awareness. Source 01.	
Economic classification	AMOUNT
423000 - Contractual services	3.570.000,00
TOTAL:	3.570.000,00

Total budget execution of the Anti-Corruption Agency for the period January 01 - December 31, 2021. Program 1601, Fight against corruption. Source 01	
Economic classification	AMOUNT
411000 - Salaries, allowances and employee benefits	160.322.032,28
412000 - Social contributions charged to the employer	26.466.944,39
413000 - Compensation in kind	656.500,00
414000 - Social benefits to employees	345.893,02
415000 - Employee cost compensation	3.267.652,38
416000 - Compensation of employees and other special expenses	819.947,29
421000 - Other expenses	4.474.266,54
422000 - Travel expenses	780.764,08
423000 - Contractual services	32.298.629,74
424000 - Specialized services	164.400,00
425000 - Regular repairs and maintenance	3.050.975,24
426000 - Material	1.767.056,69
462000 - Grants to international organizations	825.573,70
481000 - Grants to NGOs	2.000.000,00
482000 - Taxes, obligatory fees and penalties decided by the courts	44.792,00
483000 - Monetary fines and penalties as decided by the courts	196.110,00
511000- Expenditure on non-financial assets – buildings	10.811.397,20
512000 - Machinery and equipment	31.562.712,00
515000 - Intangible assets	3.322.350,00
TOTAL:	282.156.312,85

PUBLIC PROCUREMENT

In 2020, the Agency conducted public procurement based on which the following contracts were concluded:

No.	Procurement type	Type of procedure	Legal entity with which the contract was concluded	Value of the contract without VAT	Value of the contract with VAT	Execution
1.	Employee insurance - Accidental death, permanent disability, medical expenses	Centralized Public Procurement / 2020	„Generali Osiguranje Srbija“ a.d.o.	175.200,00	175.200,00	175.200,00
2.	Employee Insurance - Surgical Interventions, Severe Illnesses	Centralized Public Procurement / 2021	„Generali Osiguranje Srbija“ a.d.o.	233.280,00	233.280,00	233.280,00
3.	Physical-technical and fire protection of the facility	Centralized Public Procurement / 2021	„Dobergard“ d.o.o.	3.977.040,00	4.772.448,00	4.182.488,00
4.	Toners for HP devices	Centralized Public Procurement / 2021	„Perihard inženjering“ d.o.o.	660.000,00	792.000,00	781.731,60
5.	Maintenance of UPS devices	Centralized Public Procurement / 2021	„EHEJI ПИС“ d.o.o.	1.000.000,00	1.200.000,00	95.760,00
6.	Travel Health Insurance	Centralized Public Procurement / 2020	„Wiener Stadtische“ a.d.o.	6.000,00	6.000,00	6.000,00
7.	Computer Equipment, Lot 1 - Workstations and Monitors	Open procedure, CPP	„Bel Computers“ d.o.o.	5.688.150,00	6.825.780,00	6.825.780,00
8.	Computer equipment, Lot 2 – Servers and server equipment	Open procedure, CPP	„Magnetic System“ d.o.o.	9.531.085,00	11.437.302,00	11.437.302,00

9.	Computer Equipment, Lot 3 - Mobile Access Points	Open procedure, CPP	„Unicomtelecom“ д.о.о.	298.000,00	357.600,00	357.600,00
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No.	Procurement type	Type of procedure	Legal entity with which the contract was concluded	Value of the contract without VAT	Value of the contract with VAT	Execution
10.	Ongoing software maintenance and improvement	Open procedure, CPP	„Прозоне“ д.о.о.	4.750.000,00	5.700.000,00	2.850.000,00
11.	Mandatory Vehicle Insurance	Centralized Public Procurement / 2020	„Дунав осигурање“ а.д.о.	54.516,00	54.516,00	54.516,00
12.	Casco Vehicle Insurance	Centralized Public Procurement / 2020	„Дунав осигурање“ а.д.о.	114.239,00	114.239,00	114.239,00
13.	Mediation service for the organization of transport, hotel services and lease of business premises	Open procedure, CPP	„Nenex-trade“ д.о.о, носилац посла	4.000.000,00	4.800.000,00	523.566,00
14.	Works on adaptation (reconstruction) of the data center	Open procedure, CPP	„ЕНЕЛ ПС“ д.о.о, носилац посла	17.084.047,95	17.084.047,95	17.084.047,95
15.	Fuel	Centralized Public Procurement / 2021	„НИС а.д. Нови Сад“	416.666,67	500.000,00	93.000,00
16.	Computer Equipment Maintenance (HP Printers)	Centralized Public Procurement / 2021	„Intec“ д.о.о, носилац посла	600.000,00	720.000,00	44.028,00
17.	Property insurance	Centralized Public Procurement / 2020	„Wiener Stadtische“ а.д.о.	122.632,08	122.632,08	122.632,08

18.	Software licenses, Lot 1 - Renewal of Adobe iLansweeper software licenses	Open procedure, CPP	„Extreme“ Д.о.о.	519.300,00	623.160,00	623.160,00
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No.	Procurement type	Type of procedure	Legal entity with which the contract was concluded	Value of the contract without VAT	Value of the contract with VAT	Execution
19.	Software Licenses, Lot 2 - IBM Update software licenses	Open procedure, CPP	„Magnetic System“ д.о.о.	438.000,00	525.600,00	525.600,00
20.	Software Licenses, Lot 3 - Microsoft Windows Operating System License	Open procedure, CPP	„Extreme“ д.о.о.	1.062.600,00	1.275.120,00	1.275.120,00
21.	Software licenses, Lot 4 - Other software licenses	Open procedure, CPP	„Magnetic System“ д.о.о.	748.725,00	898.470,00	898.470,00
22.	Network devices-switches	Open procedure, CPP	„Kompjuter-Tehnika“ д.о.о.	3.045.506,00	3.654.607,20	3.654.607,20
23.	Improving the platform for user content creation and collaboration	Open procedure, CPP	„Extreme“ д.о.о.	1.245.000,00	1.494.000,00	1.494.000,00
24.	Upgrade Module in Integrity Plan Application	Open procedure, CPP	„Prozone“ д.о.о.	2.000.000,00	2.400.000,00	2.400.000,00

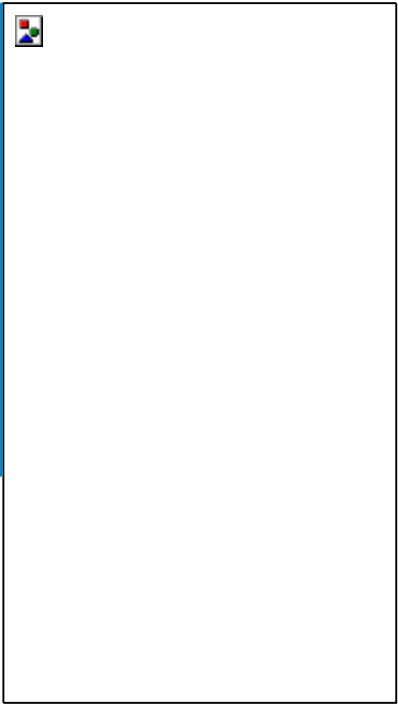
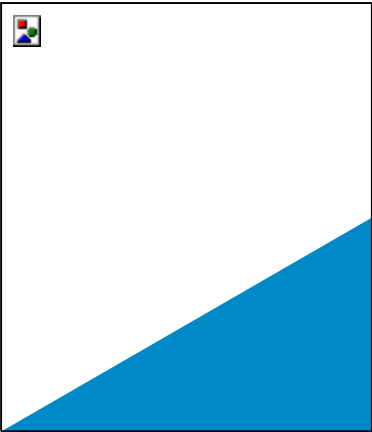
IMPROVING THE PROFESSIONAL CAPACITIES OF THE AGENCY'S SERVICE

No.	TRAINING TITLE	Number of trainings held	No. of employees
1.	LMS support – work meeting with contact persons	1	1
2.	Innovations in public administration - a matter of choice	1	5
3.	Anti-stress workshop	1	1
4.	Prevention of corruption and combat against corruption	1	1
5.	Professional development during the pandemic	1	3
6.	How to prepare and conduct a successful webinar	1	1
7.	Use of a single information system for planning, monitoring implementation, coordination of public policies and reporting	1	1
8.	Advanced text processing	1	2
9.	“ <i>PREWORK - POSTWORK</i> ”	1	3
10.	Advanced tabular calculations	1	2
11.	Gender responsible budgeting	1	1
12.	Public Procurement - making a plan	2	2
13.	Electronic government and digitization	1	1
14.	Discover your best	1	1
15.	<i>PowerPoint</i> presentation	2	4
16.	Electronic Office Business	1	2
17.	EU decision-making procedures (co-organized with the European Institute of Public Administration)	1	1
18.	Stabilization and Association Agreement	1	2
19.	ABCE European Union	1	2
20.	How To Communicate Assertively	2	5
21.	Lecturer training - basic level	1	2
22.	Tabular calculations	1	3
23.	Public Procurement - conducting the procedure	1	1
24.	Gender equality	1	2
25.	Coaching skills in online learning - LMS	1	1

26.	State protocol with elements of the business protocol	1	1
27.	Project cycle management	1	2
28.	Protection against discrimination	1	1
29.	Using a database	1	2
30.	<i>Essential Data Protection Course</i>	1	1
31.	CONTEXT: The working environment of civil servants is in place - close-up	1	1
32.	Developing storytelling skills	2	4
33.	CONTEXT: The working environment of civil servants is on the way to EU membership	1	1
34.	Internal control and risk management tools	1	1
35.	ME AND MY TEAM: Advanced Communication Skills	1	1
36.	Identifying the resources needed for public policy management - costing	1	1
37.	Performance evaluation	1	1
38.	Rights of members of national minorities	1	1

RESEARCH AND ANALYSIS CARRIED OUT DURING 2021

Comparative research of international anti-corruption conventions
Comparative analysis of the system of election of judicial office holders of individual countries in the process of European integration and individual EU member states
Analysis of legal solutions to the definition of the concept of public function in EU countries
Comparative legal analysis of the actions of the institutions and the countries of the Western Balkans;
Analysis of the Comparative Legislative Framework for lobbying in the USA, individual countries in the USA, countries in the region and Serbia;
Research in parallel practices of the Commission for Deciding Conflicts of Interest in Croatia;
Research on the practice and application of laws governing the financing of political activities in the Western Balkans in 2017, 2018 and 2019
Analysis of international practices in gender mainstreaming in the field of anti-corruption;
Statistical analysis of the field and rejected criminal reports for corrupt criminal offenses (ratio 2019 and 2020)
Analysis of the effects of implemented CSO projects, funded by the Agency in the period from 2018 to 2020



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