



Republic of Serbia



REPORT ON THE IMPLEMENTATION OF THE REVISED ACTION PLAN FOR CHAPTER 23 – SUBCHAPTER “FIGHT AGAINST CORRUPTION”

for 2024



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REPUBLIC OF SERBIA
THE AGENCY
FOR PREVENTION
OF CORRUPTION



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INTRODUCTORY REMARKS

The Revised Action Plan for Chapter 23, adopted by the Government of the Republic of Serbia on 10 July 2020, provides that the Agency will supervise the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter “Fight against Corruption”, in accordance with the new Law on the Prevention of Corruption¹.

In the previous year, the Agency prepared and published the Fourth Report on the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter Fight against Corruption”, which covered the period from the start of implementation, i.e. from 10 July 2020 to 31 December 2023, by which time all planned activities were to be completed.

Considering the importance of fulfilling the transitional provisions of Chapter 23, as well as the fact that a new revision of the Action Plan for Chapter 23 – Sub-Chapter Fight against Corruption”², has not been carried out, nor has a new public policy document been adopted, that is, a new mechanism that will determine the priorities of the Republic of Serbia in the area of reform processes and European integration, in 2024 the Agency continued to supervise the implementation of activities, that is, it assessed 80 activities, both continuous and activities that were assessed as not implemented in the First, Second, Third and Fourth Implementation Reports, including those that the Agency could not assess, namely:

- 6 in the area of implementation of anti-corruption measures;
- 51 in the area of prevention of corruption and
- 23 in the area of repression of corruption.

During 2024, the Agency collected reports on a six-monthly basis and all obligated institutions (as well as those that were not, depending on their activities) submitted reports in a timely manner and responded to additional inquiries from the Agency when they had the requested information.

The Coordination Body for the Implementation of the Action Plan for Chapter 23, established in 2021, did not meet during 2024. However, the Ministry of Justice organized a meeting of the contact persons who directly prepare reports on the implementation of the revised Action Plan for Chapter 23 on behalf of the competent institutions. At the meeting, it was agreed, among other things, that reporting on the implementation of activities that have not been implemented will continue, but now on a six-monthly basis.

In the previous cycle of reporting on implementation, the Agency defined 15 recommendations, which,

¹ In accordance with Article 6, paragraph 1 of the Law on Prevention of Corruption, the Agency monitors the implementation of strategic documents, submits a report on their implementation to the National Assembly with recommendations for action, provides recommendations to responsible entities on how to eliminate shortcomings in the implementation of strategic documents and initiates amendments and supplements to strategic documents.

² https://www.acas.rs/cyr/pages/godi%C5%A1nji_izve%C5%A1taj

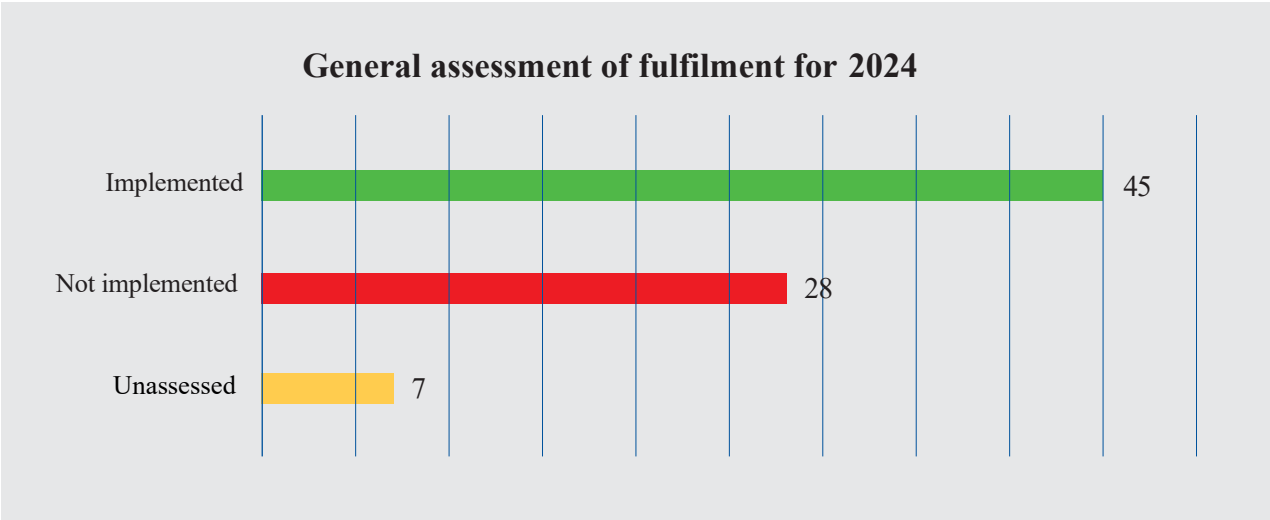
if fulfilled, could significantly affect the improvement of implementation, reporting and monitoring the implementation of future strategic documents that will deal with the fight against corruption within Chapter 23, i.e. Cluster 1. Their purpose is also to provide assistance in the process of revising the existing document, once that process has begun. In addition to the recommendations, the shortcomings and challenges that the Agency identified during the preparation of the implementation report are presented in more detail in the Fourth Report on the Implementation of the Revised Action Plan for Chapter 23 – Sub-chapter Fight against Corruption”.

After the Fifth Cycle of Monitoring the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter Fight against Corruption”, the key conclusion is that it is necessary to conduct a new revision of the Action Plan for Chapter 23 – Sub-Chapter Fight against Corruption”, or to adopt a new public policy document, that is, to establish a new mechanism that will determine the priorities of the Republic of Serbia in the field of reform processes and European integration, as well as objectives, expected results, specific activities, and the method of monitoring their achievement. The shortcomings identified in previous reports continued to significantly affect both the implementation and reporting, as well as the monitoring of the implementation of this document. The revision is also necessary due to the fact that the activities in the current document are scheduled for 2023.

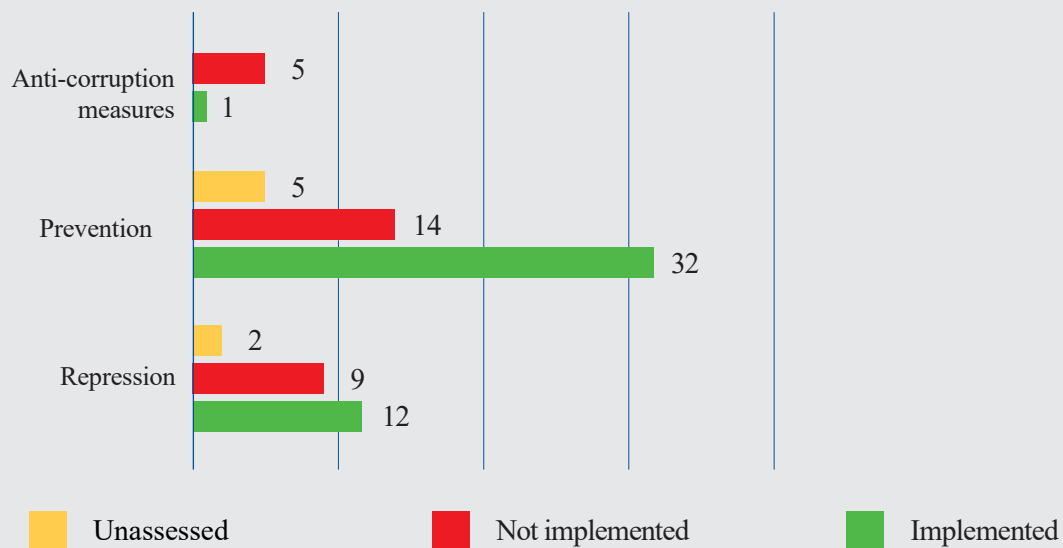
ASSESSMENT OF FULFILMENT FOR 2024

The completion assessment is presented through the so-called traffic light scale, in such a way that implemented activities are marked in green, unimplemented activities in red, and activities that the Agency could not assess are marked in yellow. The Agency assessed certain activities as two, for which explanations are provided in each such individual activity. In addition, activities that are implemented simultaneously are counted as one, which is also explained in the presentation of individual activities. For this reason, the Agency observed and assessed 80 activities in the reporting period, i.e. in 2024.

The statistical overview that follows should certainly be taken conditionally, given that not all activities have the same level of complexity, inter-institutional connection or planned duration.



General assessment of fulfilment for 2024



Assessment of fulfilment for 2024

Out of 6 reviewed activities in the area of implementation of anti-corruption measures:

- 1 (16,67%) was implemented,
- 5 (83,33%) were not implemented.

Out of 51 reviewed activities in the area of prevention of corruption:

- 32 (62,75%) were implemented;
- 14 (27,45%) were not implemented, and
- 5 (9,80%) were impossible to assess.

Out of 23 reviewed activities in the area of repression of corruption:

- 12 (52,17%) were implemented;
- 9 (39,13%) were not implemented, and
- 2 (8,70%) were impossible to assess.

IMPLEMENTATION OF ANTI-CORRUPTION MEASURES

In this report, within Section 2.1. of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, which deals with the implementation of anti-corruption measures, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report and the relevant benchmark:

2.1.1. Expand political and institutional ownership, including top-level coordination, in the field of fight against corruption, and clearly identify high-level institutional leadership in the implementation of the anti-corruption strategy.

Benchmark: Serbia is implementing the Action Plan for the implementation of the National Anti-Corruption Strategy for the period 2013–2018. Implementation is strictly monitored, and corrective measures are being taken whenever necessary. Serbia is conducting an impact assessment of its results in 2018.

The activity in question is Activity. 2.1.1.3. presented below.

Activity 2.1.1.3.

Holding regular meetings of the Coordination Body in accordance with the new Decision (Activity 2.1.1.2). Meetings of the Coordination Body are open to the public and to the participation of civil society organizations.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • The Agency for the Prevention of Corruption • All competent institutions
Deadline	Continuous, starting with the Decision from Activity 2.1.1.2
Indicators of results	Reports from the meetings of the Coordination Body are published on the website of the Ministry of Justice. Reports of Agency for the Prevention of Corruption on monitoring the implementation of the Operational Plan for the Prevention of Corruption in Areas of Special Risk were considered. The Coordinating Body is considering specific proposals of civil society organizations submitted in connection with the reports of the Coordinating Body on the implementation of the Operational Plan. The Coordinating Body has solved the problems that have arisen in fulfilling the Action Plan.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.1.1.3.

The Ministry of Justice has reported to the Agency that in the reporting period there were no meetings of the Coordinating Body for the Implementation of the Operational Plan for the Prevention of Corruption in Areas of Special Risk. Bearing in mind that the Operational Plan expired on December 31, 2022, the meetings of the Coordination Body will not even be convened.

The Agency assessed that this activity was not implemented.

In this report, in the same Section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.1.2. The Government of the Republic of Serbia is engaged in a constructive relationship with the Anti-Corruption Council and it is seriously considering its recommendations and taking them into account as much as possible.

The activities in question are Activities 2.1.2.1, 2.1.2.2, 2.1.2.3, 2.1.2.4 and 2.1.2.5, which are presented individually below.

Activity 2.1.2.1.

The Government is considering the reports of the Anti-Corruption Council at its sessions and taking them into account as much as possible.	
The Council is invited to Government sessions when the report is discussed, to present the report's main findings.	
In charge of activity	• Government of the Republic of Serbia
Deadline	Continuous
Indicators of results	The Government has considered the Council's Reports and has reached a Conclusion on further action related to the Council's findings and recommendations.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.1.2.1.

The Government of the Republic of Serbia has informed the Agency that during the reporting period, it did not consider the Council's reports for the fight against corruption. In the first and second quarters of 2024, the Council submitted to the Government of the Republic of Serbia a Report on the phenomena of systemic corruption, while in the third and fourth quarters of 2024, the Council submitted to the Government of the Republic of Serbia a Report on the Position of the Pension and Disability Insurance Fund as a Defendant in a huge number of administrative disputes due to the silence of the administration before the Administrative court in the Period 2013–2023 and a Report on the financing of sports and sports Infrastructure in the Republic of Serbia. The Council has no feedback on whether the Government of the Republic of Serbia has considered the recommendations and conclusions from these reports. In the points where the Government of the Republic of Serbia is the bearer of the activities, and which relate to the Anti-Corruption Council, the Council has no information on the performance

indicators, i.e. on the fulfillment of these activities.

As both the activity and the indicators of results refer to the review of the report of the Council for the fight against corruption and the adoption of the Conclusion on further action in connection with the findings and recommendations of the Council for the fight against corruption, the Agency assessed the activity as not implemented.

Activity 2.1.2.2.

Adopt a new Decision of the Government of RS regulating the work of the Anti-Corruption Council, in accordance with the conducted analysis titled “Anti-Corruption Council of the Government of the Republic of Serbia in the Light of Best Practices of the European Union”, developed within the IPA 2013 project “Prevention and Fight against Corruption”	
In charge of activity	• Government of the Republic of Serbia • Ministry of Justice (State Secretary in charge of corruption issues) • Anti-Corruption Council
Deadline	Second quarter of 2021
Indicators of results	A new Decision of the Government of the Republic of Serbia, which regulates the work of the Anti-Corruption Council in accordance with the conducted analysis, has been adopted.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.1.2.2.

The Government of the Republic of Serbia has reported that this activity was not implemented.

The Agency assessed that this activity was not implemented.

Activity 2.1.2.3.

Ensure active participation of the Anti-Corruption Council in the legislative process, through membership in working groups for the adoption and amendment of laws that, according to the Council, carry a risk of corruption, at the initiative of the Council, i.e. bodies authorised to propose laws.	
Members of the Council actively participate in the work of working groups.	
In charge of activity	• Anti-Corruption Council
Deadline	Continuous
Indicators of results	The Council receives information on legislative activities in a timely manner, acts proactively, and Council members actively participate in the legislative process.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.1.2.3.

The Anti-Corruption Council has reported that, in the reporting period was not invited to participate as an active member in the working groups. As in previous years, the submitted information does not correspond to the essence of this activity, i.e., it does not represent participation in the legislative process.

The Agency assessed that this activity was not implemented.

Activity 2.1.2.4.

The Republic Public Prosecutor's Office considers the reports of the Council from the point of view of possible criminal responsibility and forwards them to the competent prosecutor's offices to act. It also follows up and reports.	
In charge of activity	• Republic Public Prosecutor's Office • Government of the Republic of Serbia
Deadline	Continuous
Indicators of results	Annual reports on the activities related to the reports of the Anti-Corruption Council have been prepared and submitted to the Government.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.1.2.4.

The Republic Public Prosecutor's Office has reported that it was considering the reports of the Anti-Corruption Council, forwarding them to the competent prosecutor's offices, and monitoring their actions. Reports on the actions of public prosecutor's offices based on the reports of the Anti-Corruption Council for 2020, 2021, 2022 and 2023 have been prepared and submitted to the Council.

However, as it was convinced that this was a regular annual practice of the Republic Public Prosecutor's Office, which was supported by the report for 2020, 2021, and 2022, and the fact that reports for the previous year are prepared in the following year, in this reporting period the Agency assessed the activity as implemented.

Activity 2.1.2.5.

Further strengthen the budget and staffing capacities of the Anti-Corruption Council.	
In charge of activity	• Government of the Republic of Serbia • Anti-Corruption Council
Deadline	Second quarter of 2021
Indicators of results	The Government decision appointing members of the Anti-Corruption Council has been adopted. Higher level of administrative support from the General Secretariat of the Government.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.1.2.5.

The Government of the Republic of Serbia has reported that this activity was not implemented.

The Anti-Corruption Council has reported that, after the meetings held with the Minister for European Integration on June 15, 2023, it submitted a proposal for the appointment of two new members of the Council, which was accepted by the Government of the Republic of Serbia in 2021, but that he is not always informed of their appointment.

The Agency assessed that this activity was not implemented.

PREVENTION OF CORRUPTION

In this report, within the Section 2.2 of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, which refers to the prevention of corruption, the Agency assessed the implementation of activities related to the following benchmarks:

2.2.1. Transitional benchmark: Serbia has adopted a new Law on the Anti-Corruption Agency, providing said Agency with clear and strong competencies. Serbia has ensured that the Anti-Corruption Agency can continue to enjoy the necessary independence, the receipt of adequate financial and human resources, training, as well as very good embedment with other relevant bodies (including access to their databases). Serbia has ensured that all bodies that fail to submit their reports and refuse to cooperate with the Anti-Corruption Agency are held accountable for such behaviour.

Transitional benchmark: Serbia has provided initial records of effective implementation of the asset declaration and verification system, including dissuasive sanctions in cases of non-compliance, as well as appropriate monitoring of measures (including criminal investigations where necessary) in cases where reported assets do not correspond to reality

The activities in question are Activities no: 2.2.1.1, 2.2.1.2, 2.2.1.3, 2.2.1.4, 2.2.1.5, 2.2.1.6, 2.2.1.8. and 2.2.1.9, which are individually presented below.

Activity 2.2.1.1.

Monitor the implementation of the new Law on Prevention of Corruption and the actions of all state authorities under the new Law on Prevention of Corruption.	
In charge of activity	• Agency for prevention of corruption • In cooperation with relevant institutions
Deadline	Continuous, once per year
Indicators of results	The annual report on the work of the Agency for prevention of corruption contains the following elements: 1) Number of obligations fulfilled by public officials in accordance with the Law on Prevention of Corruption; 2) Number of measures issued by the Agency respected by public officials; 3) Percentage of institutions that have fulfilled the obligation to adopt an integrity plan and a local anti-corruption plan; 4) Percentage of measures in the integrity plan and local anticorruption plan implemented by relevant institutions; 5) Number of institutions that adhere to the obligation to conduct training in ethics and integrity based on the curriculum of the Agency; 6) Qualitative analyses, comparisons with previous years, comparison of results with the number of reported cases and controlled subjects. The National Assembly has adopted conclusions on the implementation of the new Law on Prevention of Corruption. The Government and other state authorities are acting in accordance with the conclusions of the National Assembly. The European Commission's Report on the progress of the Republic of Serbia.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.1.1.

The data on the monitoring of the implementation of the Law on the Prevention of Corruption can be found in the annual work reports submitted by the Agency to the National Assembly, and are publicly available. Moreover, the data according to the indicators of results can be found in the previous reports on the implementation of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

This report presents data for the year 2024.

Data on conflict of interest are presented in Activity 2.2.3.4.

In the reporting period, the number of submitted reports on the assets and revenues of public officials was 6.792, the number of public authorities that notified the Agency of the commencement/termination of public office was 2.371, and that 5 legal entities notified the Agency of their participation in public procurement, privatization, or other procedures, that involve concluding a contract with a public authority as their outcome.

In the process of supervising the reports on the assets and revenues of public officials, the Agency initiated 204 proceedings for deciding on the violation of the provisions of the on the Prevention of

Corruption, 202 warning measures were issued, one measure of public announcement of the decision on the violation of the law was issued and 152 requests for the initiation of misdemeanor proceedings were filed. Additionally, during 2024.

Additionally, during 2024:

- An initiative was given to the Ministry of Agriculture, Forestry and Water Management to amend the Rulebook on the allocation of grants within the framework of the project for competitive agriculture.
- An initiative was given to the Ministry of Justice to amend the Law on the Prevention of Corruption.
- An initiative was given to the Ministry of Justice to amend the Law on Criminal Procedure.
- A Cooperation Agreement was concluded with the Faculty of Law of the University of Novi Sad, with the aim of establishing long-term cooperation, which will contribute to the development and improvement of the work of both institutions, through strengthening the educational, scientific and research capacities of the Agency and the faculty.
- A Cooperation Agreement was concluded with the Conference of the Universities in Serbia. The aim of the agreement is to establish long-term cooperation, which will contribute to the development and improvement of the work of both institutions, by strengthening the capacity of the Agency and the Conference of the Universities in Serbia in the inclusion and coordination of universities in Serbia in activities to prevent and combat corruption.
- A Memorandum of Cooperation was concluded with the Association of Business Lawyers of the Republic of Serbia. The aim of the agreement is to establish and develop cooperation between the signatories of the agreement in areas that are important for the performance of the activities of both parties to the agreement, and includes connections in professional, scientific, research, educational and expert activities, through the implementation of joint projects and activities.
- An Agreement on Cooperation in the area of preventing corruption was concluded with the Ministry of education, the Institute for the education quality assessment. The aim of the agreement is to improve cooperation between the signatory parties, as well as to raise awareness among students in primary and secondary schools in the field of preventing corruption.
- A Memorandum of Cooperation in the field of professional development of public administration employees was concluded with the National Academy of Public Administration. The aim of the memorandum is to establish cooperation in the field of professional development of public administration employees in order to raise awareness among employees about the importance of preventing and combating corruption.
- A Cooperation Agreement was concluded with the Faculty of Applied Sciences in Niš of the University of Economics and Business in Novi Sad, with the aim of contributing to the development and improvement of the work of both institutions, through strengthening the educational, scientific and research capacities of the Agency and the faculty.

Given that integrity plans are adopted every three years, and that the development and implementation of integrity plans in the fourth cycle will begin in 2025, the target value of the indicator, which is the percentage of institutions that have fulfilled the obligation to adopt an integrity plan and a local anti-corruption plan for 2024, cannot be measured.

Regarding the indicator relating to the percentage of measures in the integrity plan and local anti-corruption plan implemented by relevant institutions, the value of the indicator will be determined after processing data from the reports on the implementation of integrity plans. The third cycle of the integrity plan has been completed, and based on the Agency's records, 98% of institutions that were obliged to develop and implement an integrity plan reported to the Agency on the implementation of the integrity plan, thereby successfully completing the third cycle.

During 2024, the Agency conducted 18 trainings for trainers (training of trainers) in the area of ethics and integrity, attended by ten employees (seven women and three men) in public enterprises, institutions, administrations of the City of Čačak and the Municipality of Gornji Milanovac. The five-day training for trainers was held with the aim of strengthening the competences of the participants for the independent implementation of the “Ethics and Integrity” training in the bodies where they are employed, which they demonstrated by taking a knowledge test and performing one segment of the training, thus gaining the status of educated implementers. After the training, all participants were provided with certificates of successful completion of the training for trainers.

At the National Academy of Public Administration, the Agency's accredited implementer held a training course on “Ethics and Integrity” attended by six participants (five women and one man), as part of the project “Strengthening the Professional Capacities of Civil Servants in Serbia”.

At the National Academy of Public Administration, the Agency's accredited implementer held a training course on “Resolving Ethical Dilemmas”, where nine female civil servants in positions had the opportunity to improve their knowledge and decision-making skills in ethically challenging situations.

At the State Audit Institution, a training course on “Ethics and Integrity” was held for new employees who did not attend the training in the first cycle of its implementation. The training was attended by 34 employees (23 women and 11 men).

Data on local anti-corruption plans is presented in the Activity 2.2.10.31.

Since the Agency has submitted all the data on the application of the Law on Prevention of Corruption, which, according to result indicators, were objectively possible to submit, and since, from the submitted report, it is evident that the application of the new Law on the Prevention of Corruption is being monitored, in this reporting period the Agency assessed the activity as implemented.

Activity 2.2.1.2.

Conduct an analysis of the effects of the implementation of the new Law on the Prevention of Corruption, which will cover the period from the beginning of its implementation and the next three years, especially in the following areas: - reports on assets and revenues of public officials, including appropriate measures in cases of non-compliance, as well as monitoring of measures (including criminal investigations where necessary); - prevention of conflicts of interest; - control of the financing of political activities; - supervision over the implementation of integrity plans and - monitoring the implementation of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.	
In charge of activity	• Anti-Corruption Agency • Misdemeanor courts • Republic Public Prosecutor's Office • In cooperation with other relevant institutions
Deadline	Fourth quarter of 2023
Indicators of results	The analysis determined the effects of the application of the new Law in the following areas: - reports on assets and revenues of public officials; - prevention of conflicts of interest; - control of the financing of political activities; - supervision over the implementation of integrity plans; - monitoring the implementation of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”. The analysis includes quantitative and qualitative result indicators. The analysis is publicly available on the official website of the Anti-Corruption Agency.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.2.1.2.

In the reporting period, the Agency collected and provided comments on the submitted proposals for the structure of the report and questionnaires, according to the Methodology for Assessing the Effects of the Implementation of the Law on the Prevention of Corruption.

A sample of public sector institutions, i.e. public authorities, was prepared and a questionnaire was sent for the survey according to the methodological tool for monitoring the effects of the Law on the Prevention of Corruption.

In cooperation with UNODC, a survey of citizens and business entities was completed (in cooperation with the Serbian Chamber of Commerce) and reports were prepared.

In the reporting period, a Report on the Effects of the Implementation of the Law on the Prevention of Corruption was prepared. Given that the Agency collected data in 2024 for the first time to create indicators in specific thematic areas, the report forms the basis for assessing the effects of the law in the following period, and the report was not published on the Agency's official website.

The Agency assessed this activity as not implemented, given that one of the performance indicators is that the analysis be publicly available on the Agency's official website.

Activity 2.2.1.3.

Continuous specialized training of employees in the Agency for prevention of corruption on the implementation of the new Law on Prevention of Corruption and the Law on Lobbying.	
In charge of activity	• Agency for prevention of corruption
Deadline	Continuous, starting with the adoption of the new Law on Prevention of Corruption and the Law on Lobbying.
Indicators of results	Trainings have been conducted. Out of the total number of employees in the Agency, at least 2/3 attended trainings on the implementation of the new Law on Prevention of Corruption, i.e. the Law on Lobbying, in the first year of implementation.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.1.3.

The Agency continuously reported on the conducted trainings and the data can be found in the previous reports on the implementation of the Revised Action Plan for Chapter 23 – Subchapter “Fight against corruption”.

This report presents data for the year 2024.

As part of the Project “Support for Strengthening the Rule of Law in the Republic of Serbia” (EU for the Fight against Corruption and Fundamental Rights), jointly financed by the EU, the German Federal Ministry for Economic Cooperation and Development (BMZ) and the Austrian Development Cooperation (ADC), and implemented by GIZ, ADA, CPMA and the OSCE Mission to Serbia, a training course was held on “Public-Private Partnership”, organized by the International Anti-Corruption Academy (IACA), attended by 13 employees. Then, on 4 and 5 November, a training course on “Financial Forensics” was held, attended by 12 employees. Also, a training course on “Participants in Anti-Corruption Initiatives” was held on 17 and 18 December 2024 for 16 employees of the Agency.

Three representatives of the Agency participated in the online annual conference of the European network of countries with Registry of lobbyists, organized by the Ethics Commission of the Republic of Lithuania.

A representative of the Agency participated in the webinar “Lobbying in the Republic of Serbia”, organized by the National Academy for Public Administration.

Within the USAID Project for the improvement of public procurement, a roundtable / workshop was held to harmonize views on the implementation of the Public procurement law between the Agency for the prevention of corruption and the Public procurement office, in which two representatives of the Agency participated.

A representative of the Agency participated in a training on clusters of negotiation chapters, organized by the Regional school for public administration – RESPA.

In February 2024, two representatives of the Agency participated in a conference in Warsaw funded by the European Union and the Austrian Development Agency on the topic “Regional exchange on strengthening campaign financial systems and practices” organized by the Office for Democratic Institutions and Human Rights of the Organization for Security and Co-operation in Europe (ODIHR/OSCE), within the “Support to Electoral Reforms in the Western Balkans”.

Two Agency employees attended the workshop “Abuse of the right to complaints and appeals” organized by the National academy for public administration.

Two Agency representatives participated in the MATRA training program, on the topic “Implementation of Justice and Democratic Institutions”, in a hybrid form – the online part of the training in the period from 15 to 26 April, and then in the Netherlands in the period from 10 to 21 June 2024; A representative of the Agency participated in the training on the topic “Management of Public Services” within the MATRA program. The first part of the training was held in an online format, while the second was held in the Netherlands in December 2024.

Within the framework of the Council of Europe project “Suppression of economic crime in Serbia”, which is implemented with the support of the Swedish International Development Cooperation Agency, 11 employees participated in the “Workshop on ethics and integrity of top state officials” in accordance with the GRECO recommendation from the Fifth Evaluation Round, at which the consultant's material was presented; a round table was also held on the topic “Analysis of the Lobbying Law and Recommendations for Improvement”, in which four representatives of the Agency participated.

Training was held for new employees of the Agency, which covered all topics according to the Agency's competence.

As of 31 December 2024, 93 people out of a total of 162 provided for by the Rulebook on internal organization and systematization of job positions were employed in the Agency, which represents 57.40% of the job positions. The total number of employees in the Agency who underwent training related to the implementation of the Law on the Prevention of Corruption in the reporting period is 64, which means that more than 2/3 of employees attended training related to the implementation of the Law on the Prevention of Corruption, with the note that the same employees participated in certain trainings, depending on the topic and organizational unit of the Agency to which the topic relates.

Considering the above mentioned, the Agency assessed this activity as implemented.

Activity 2.2.1.4.

Adapt the software for reporting on the National Anti-Corruption Strategy and the Action Plan for its implementation so that it meets the needs of monitoring the relevant measures of the Revised Action Plan for Chapter 23, and maintain said software on a regular basis.	
In charge of activity	• Agency for prevention of corruption
Deadline	Software customization – IV quarter of 2020 Software maintenance – continuous
Indicators of results	Software has been customised to meet the needs of monitoring relevant measures from the Revised Action Plan for Chapter 23. The software is regularly maintained.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.1.4.

The agency has reported that the reporting software, i.e. the application, was adjusted and put into operation in the third quarter of 2021. The Agency eliminated the identified shortcomings in the regularly maintained reporting application, which enabled taxpayers to submit reports in that way as well. At the same time, the Agency continued to collect data via e-mail and correspondence, with the aim of uninterrupted supervision over the implementation of the Subchapter “Fight against Corruption” of the Revised Action Plan for Chapter 23.

Considering the above mentioned, the Agency assessed this activity as implemented.

Activity 2.2.1.5.

Adjust the software for reporting on the Revised Action Plan for Chapter 23 to meet the needs for monitoring the Operational Plan for the Prevention of Corruption in Areas of Risk.	
In charge of activity	• Agency for prevention of corruption
Deadline	Third quarter of 2021
Indicators of results	Software was customised to meet the needs of monitoring the Operational Plan for the Prevention of Corruption in areas of risk.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.2.1.5.

The Agency has reported that it has not adjusted the software because the Operational Plan for Preventing Corruption in Areas of Special Risk was to be in effect only until the end of 2022, and because spending funds would not be expedient taking into account the duration of the development and testing of the application.

Considering the above mentioned, activity was assessed as not implemented.

Activity 2.2.1.6.

Technically improve the existing software application related to integrity plans. Maintain the software application regularly.	
In charge of activity	• Agency for prevention of corruption
Deadline	For software updating – IV quarter of 2021 For software maintenance – continuous
Indicators of results	Software has been updated. Software is regularly maintained.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.1.6.

The Agency has reported that the technical maintenance of the software application for integrity plans was completed in 2021, as well as that the application was functioning. The Agency reported that in 2024 maintenance of the software application for integrity plans has continued.

Considering the above mentioned, activity was assessed as implemented.

Activity 2.2.1.8.

Multidisciplinary trainings and workshops with institutions that intensively cooperate with the Anti-Corruption Agency, including trainings for journalists.	
In charge of activity	• Agency for prevention of corruption
Deadline	Continuous
Indicators of results	Trainings and workshops that contribute to the improvement of the level of knowledge necessary for the implementation of the new Law on Prevention of Corruption have been conducted. At least two trainings per year are organised with institutions with which the Agency cooperates intensively. At least one training per year is organised for journalists.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.1.8.

The Agency has reported on the conducted trainings and the fact that the data can be found in previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

This report presents data for 2024.

At the request of the State audit institution, the Agency held a training course on “Ethics and Integrity” for 34 new employees of this institution, as well as employees who did not attend the aforementioned training in the first cycle.

Training was held within the project “Strengthening the capacity of the internal control sector to conduct corruption risk analysis” organized by the OSCE Mission to the Republic of Serbia for 19 members of the Ministry of Internal Affairs.

In support of the implementation of the Public Administration Reform Strategy in the Republic of Serbia, for the period from 2021 to 2030, i.e. support for the establishment/introduction of an ethics infrastructure system in the Republic of Serbia, the Agency participated in a series of meetings organized in cooperation with the National Academy of Public Administration (NAPA) and the Ministry of Public Administration and Local Self-Government on the preparation of a training program for ethics officers, within the pilot project “Introduction of Ethics and Integrity Officers in the Public Administration of the Republic of Serbia” which is being implemented with the support of the UN Office on Drugs and Crime (UNODC).

The Agency held a training on the importance of developing an integrity plan for future ethics and integrity officers. The participants of the training were presented with the importance and purpose of developing and implementing an integrity plan as an anti-corruption mechanism for strengthening institutional integrity, practical examples, and a case study related to assessing the intensity of corruption risk. In addition to the integrity plan training, future officers were given accounts on the distance learning platform to attend the “Ethics and Integrity” training.

A representative of the Agency participated in a regional conference in Tirana on “Corruption and Money Laundering Risks in Environmental Crime”, organized by the Council of Europe.

Participation in an online meeting, as well as a roundtable with representatives and experts of the Council of Europe, on the topic of “Analysis of the regulatory framework for lobbying in Serbia and proposals for improvement” organized by the Council of Europe with the support of the Agency for prevention of corruption, which was attended by, in addition to employees of the Agency and experts from the Council of Europe, representatives of the Ministry of Justice, a large number of lobbyist associations, as well as authors and professors at universities who have written numerous articles and books on the topic of lobbying, and where opinions were exchanged on current legal solutions and on the proposals presented by the expert of the Council of Europe.

The Agency had its participant in the mentor training “Introductory Program for Mentors and Participants in the Professional Practice Program”, organized by the OSCE, in order to provide support through mentoring to interns at the Agency under the aforementioned program.

The Agency representative participated in a roundtable discussion with representatives of the Public Procurement Office, where views and opinions were exchanged regarding the implementation of the Public Procurement Law, and an introduction to the work practices of these two institutions, organized by USAID.

Participation in the Regional Conference of the Regional Platform for Monitoring the Implementation of the United Nations Convention against Corruption (UNCAC), organized by the UN Office on Drugs and Crime (UNODC), which was held in Tirana.

Participation of the Agency representative at the event within the ERASMUS project “European Partnership for Ethics and Integrity”, held in Bucharest.

At the proposal of the General Secretariat of the Government of the Republic of Serbia the Agency representative participated in the meeting of the OECD Working Group on Social Integrity and the Fight against Corruption in Paris as a member of the working group.

The Agency representative gave a lecture on ethics and integrity as part of the training “Integrity Standards of Public Officials through the Legal and Institutional Framework for Preventing Corruption” for representatives / holders of the highest executive positions in the Republic of Serbia.

The Agency representative participated in the seventh meeting of the Inter-Ministerial Project Group for Expert Affairs in Coordination and Monitoring of the Implementation Process of the Public Administration Reform Strategy, at which the results of the Sigma Monitoring Report for Serbia were presented.

The National Academy for Public Administration held a training course on “Ethics and Integrity”.

A representative of the Agency gave a lecture on corruption risk assessment and integrity plans as part of the seminar “Professional Consulting of Employees in the Field of Human Resources and Personnel Records”.

A representative of the Agency participated in a meeting of the Special Inter-Ministerial Working Group for the Development and Monitoring of the Implementation of the Fifth Action Plan for the Implementation of the Initiative “Partnership for Open Government in the Republic of Serbia”.

A training course was held for officials in the highest state positions on the topic of assessing the risks of corruption in regulations, lobbying, asset verification, conflict of interest and integrity; Training was held for officials and employees of local government units in Novi Sad, Subotica, Niš, Kragujevac and Novi Pazar, on the topic of assessing the risk of corruption in regulations, lobbying, asset verification and conflict of interest.

Training was held for lobbyists to obtain a certificate, as one of the conditions for entry into the Registry of lobbyists.

Attendance at a session with mentors within the framework of the Project Management Internship Programme, organized by the OSCE; participation in a study visit to Novi Pazar within the framework of the Youth Internship Programme from South and South-West Serbia, organized by the OSCE Mission to Serbia.

Participation in the workshop “Review of the Law on the National Criminal Intelligence System”, in cooperation with the Ministry of Internal Affairs, under the EU project.

Participation in the workshop “Impact Assessment on the Protection of Personal Data in the National Criminal Intelligence System”, organized by the Ministry of Internal Affairs and the Swedish Police.

Representatives of the Agency participated in the meeting of the Working Group for the development of the accompanying action plan for 2024–2025, along with the National Anti-Corruption Strategy for 2024–2028, as well as in a two-day workshop in Vršac, where activities were defined, the authorities responsible for implementing the activities were determined, and deadlines for implementation were defined.

As part of the public debate (public debate held from 8 to 28 October 2024) on the Draft Action Plan for the period 2024–2025 for the National Anti-Corruption Strategy for the period 2024–2028, representatives of the Agency participated in a roundtable discussion.

Participation in the meeting of the European Commission for the Efficiency of Justice of the Council of Europe held on 19 November 2024 (Presentation of the CEPEJ methodology and results of data collection for the Western Balkans Dashboard 2024 (data for 2023)).

Within the framework of the Council of Europe project “Suppression of Economic Crime in Serbia”, which is implemented with the support of the Swedish International Development Cooperation Agency, representatives of the Agency participated in a workshop on assessing the risk of corruption in regulations.

The training for journalists was held on 18 November 2024 in an online format under the title “Effective models of communication between the Agency and the media”. The participants of the training, media representatives, were introduced to the topics of control of reports of political entities, declaration and verification of assets of public officials and conflicts of interest and cumulation of functions. The ways of communicating the results of the Agency's work to the public was presented through interactive participation of the media and Agency representatives.

In 2024, the Agency organized four trainings for heads of institutions “The Leader as a Driver of Building Institutional Integrity”.

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

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

A total of 292 participants (112 men and 180 women) were trained on the concept, importance and method of developing an integrity plan, assessing the risk of corruption and other irregularities in an institution, including determining measures to reduce corruption in work processes. Of this number, 102 managers (49 men and 53 women) improved their knowledge and understanding of their powers and responsibilities in developing and implementing an integrity plan and creating an organizational culture in the institutions they manage.

In the reporting period, 8,521 participants successfully completed the distance learning training “Socially sensitive groups and corruption”.

Activity 2.2.1.9.

Hold workshops with the relevant parliamentary committee in order to meet the Agency’s recommendations, including training on ethics and integrity for MPs.	
In charge of activity	• Agency for prevention of corruption • Relevant Assembly committees
Deadline	Continuous
Indicators of results	Workshops were held to contribute to improving the level of knowledge necessary for the implementation of the new Law on Prevention of Corruption. At least two workshops per year are organised with MPs, i.e. members of relevant committees of the National Assembly.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.2.1.9.

Cooperation was established with the National Assembly and the National Assembly Ethics Commission regarding the organization and implementation of training for MPs on the implementation of the Code of Conduct for MPs. Topics for training arising from the regulations governing the prevention of conflicts of interest in the performance of public functions were proposed. A meeting of representatives of the Agency and the National Assembly was held.

At meetings held during the reporting period the Agency for prevention of corruption and the National Assembly specified the topics for training for MPs on the implementation of the Code of Conduct for MPs and regulations governing the prevention of conflicts of interest in the performance of public functions. Also, during the reporting period, contact persons were appointed for further cooperation on the implementation of training in accordance with Article 26 of the Code of Conduct for MPs.

In 2024, neither workshop was held with competent parliamentary committees, or trainings on ethics and integrity for MPs.

Bearing in mind the result indicator, i.e. that it is necessary to organize at least two workshops per year with MPs, i.e. members of competent committees of the National Assembly, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.2.2. Serbia has amended the Law on Financing Political Activities and is working on strengthening the independence and administrative capacity of relevant oversight bodies, in particular the State Audit Institution and the Republic Election Commission. Serbia is providing initial records of adequate application of the Law, including deterrence measures where necessary.

The activities in question are Activities no. 2.2.2.3, 2.2.2.5, 2.2.2.6. and 2.2.2.7. which are individually presented below

Activity 2.2.2.3.

Monitor the implementation of the Law on Financing Political Activities, including the application of dissuasive measures.	
In charge of activity	• Agency for prevention of corruption • Misdemeanor courts • Republic Public Prosecutor's Office
Deadline	Continuous
Indicators of results	Reports of the Anti-Corruption Agency on the financing of political activities and the election campaign. 1) At least 50% of political entities have submitted annual financial reports; 2) At least 70% of political entities have submitted the costs of the election campaign; 3) The number of initiated misdemeanor proceedings, the number and degree of sanctions imposed by the misdemeanor courts. Annual reports of the Republic Public Prosecutor's Office on criminal proceedings arising from the application of Article 38 of the Law on Financing Political Activities, including the number and degree of sanctions applied.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.2.3.

According to the result indicators, data on the monitoring of the implementation of the Law on the financing of political activities can be found in the previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

This report shows data for the year 2024.

The agency reported that in 2024, elections were held to elect councilors in the city assemblies of Belgrade, Valjevo, Vršac, Zrenjanin, Jagodina, Kikinda, Niš, Novi Sad, Pančevo, Požarevac, Sombor, Sremska Mitrovica, Subotica, Užice, Čačak, and the municipal assemblies of Ada, Aleksinac, Alibunar, Apatin, Arilje, Bač, Bačka Palanka, Bačka Topola, Bački Petrovac, Bela Crkva, Beočin, Bečej, Boljevac, Bosilegrad, Bujanovac, Vrbas, Vrnjačka Banja, Gornji Milanovac, Žabalj, Žitište, Ivanjica, Indija, Irig, Kanjiža, Kovacica, Kovin, Mali Idoš, Nova Varoš, Nova Crnja, Novi Bečej, Novi Kneževac, Opovo, Odžaci, Pećinci, Plandište, Preševo, Raška, Ruma, Svilajnac, Svrljig, Senta, Sjenica, Srbobran, Sremski Karlovci, Stara Pazova, Surdulica, Temerin, Titel, Čajetina, Čoka, Šid.

During the election campaign, the Agency organized and conducted monitoring of the election activities of political entities that participated in the aforementioned elections. In this regard, the election procedure and training for election campaign observers were conducted in several cities, and for the purposes of performing data collection tasks in the field to monitor the control of the financing of election campaign expenses. 44 field observers were engaged. Two central coordinators from the Agency were engaged to monitor and control the work of observers in the field.

During the reporting period, the Agency conducted ex officio proceedings against political entities for violations of the Law on Financing of Political Entities and based on filed reports.

A total of 41 decisions were made on applications related to the election campaign, as follows:

Ten decisions related to the election campaign for the elections held on December 17, 2023 (in seven cases it was determined that there was no violation of the Law, in two cases a warning measure was imposed, one affirmative decision), 31 decisions were made on applications in the election campaign regarding the elections held on June 2, 2024 (in 19 cases it was determined that there was no violation of the Law, ten warning measures and two decisions establishing a violation of the Law and the basis for initiating a misdemeanor procedure). Decisions on applications are available on the Agency's website at the link https://www.acas.rs/cyr/page_with_sidebar/izbori#.

In the reporting period, the Agency filed a total of 282 requests for the initiation of misdemeanor proceedings against political entities and responsible persons in political entities for violation of the Law on Financing of Political Activities, of which:

- 90 for failure to submit reports on election campaign expenses for the elections held on December 17, 2023 (60 for failure to submit preliminary reports on election campaign expenses and 30 for failure to submit final reports on election campaign expenses);
- 127 requests filed for failure to submit reports on election campaign expenses, in connection with the elections held on June 2, 2024 (70 for failure to submit preliminary reports on election campaign expenses and 57 for failure to submit final reports on election campaign expenses);
- 52 requests were filed for failure to submit annual reports on the financing of political entities;
- Three requests were filed for failure to provide information and data upon request by the Agency for Final Reports on Election Campaign Expenditures;
- Two requests were filed for the fact that the report on election campaign expenses did not contain all the data;
- Eight requests were filed for other violations of the law.

- During the reporting period, the Agency conducted ex officio proceedings against political entities for violations of the Law on Financing of Political Activities, as follows:
- 17 decisions were issued imposing a warning measure on political entities in proceedings initiated ex officio, namely in the election campaign for the elections held on December 17, 2023, nine decisions, and eight decisions for the elections held on June 2, 2024.
- Nine warning measures were issued in regular proceedings for violations of the Law on Financing of Political Activities, which were determined in the procedures for controlling the reports of political entities

In the reporting period, the Agency, based on final judgments imposing fines on political parties and responsible persons in groups of citizens who have representatives in representative bodies, issued 29 decisions on the loss of the right to funds from public sources. All decisions are published on the Agency's website https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#.

203 annual reports on the financing of political entities with forms were submitted and verified.

1191 preliminary and final reports on election campaign expenses of political entities for the elections held on December 17, 2023 and June 2, 2024 were submitted and verified, as follows:

For the elections held on December 17, 2023, the following were verified:

- Reports on election campaign expenses – 51 reports
- Final reports on election campaign expenses – 377 reports.

For the elections held on June 2, 2024, the following were verified:

- Preliminary reports on election campaign expenses – 376 reports
- Final reports on election campaign expenses – 387 reports.

A substantive audit was conducted of 98 submitted preliminary and final reports on election campaign expenses, 51 submitted preliminary and final reports on election campaign expenses for the elections held on December 17, 2023, according to the established Control Plan, namely for the election of members of parliament to the National Assembly of the Republic of Serbia, members of parliament to the Assembly of the Autonomous Province of Vojvodina, councilors to the Belgrade City Council and the Kragujevac City Council, and 47 reports for the elections held on June 2, 2024, according to the established Control Plan and Supplement to the Control Plan for the election of councilors to the city assemblies of Belgrade, Zrenjanin, Pančevo, Subotica, Niš, Novi Sad and Čačak for 2024.

In accordance with the Law, the Agency published on its website the Report on the Control of the Financing of the Election Campaign Expenses for the Election of Members of Parliament to the National Assembly of the Republic of Srpska and the Election of Councilors to the Assembly of the Autonomous Province of Vojvodina for 2023, the Report on the Control of the Financing of the Election Campaign Expenses in the City Assemblies of Belgrade and Kragujevac for 2023, the Report on the Control of the Financing of the Election Campaign Expenses for the Election of Councilors in the City Assemblies of Belgrade, Zrenjanin, Pančevo and Subotica for 2024, and the Report on the Control of the Financing of the Election Campaign Expenses for the Election of Councilors in the City Assemblies of Niš, Novi Sad and Čačak for 2024. The reports are available at https://www.acas.rs/cyr/page_with_sidebar/politicki_subjekti#

In accordance with the Law, the Agency adopted and published the Control Plan for the Reports on Election Campaign Expenditures for the elections held on June 2, 2024 and the Supplement to the Control Plan. The adopted plans are available at https://www.acas.rs/cyr/page_with_sidebar/izbori#

A total of 115 final judgments were issued, of which:

- 44 at the legal minimum,
- 44 below the legal minimum,
- nine above the legal minimum,
- 17 remainders and
- one acquittal.

Note: Second-instance final judgments were issued based on requests to initiate misdemeanor proceedings filed in previous years.

The Republic Public Prosecutor's Office reported that it is monitoring the actions of public prosecutor's offices in cases that were opened based on criminal reports related to violations of the provisions of the Law on the Financing of Political Activities and informing the Agency for the Prevention of Corruption thereof. Six-monthly reports on the actions of public prosecutors' offices in cases from this area are drawn up in January and July.

In July 2024, the Anti-Corruption Agency received the report on the actions of public prosecutors' offices based on criminal reports regarding violations of the provisions of the Law on Financing Political Activities.

Considering all the above, Agency assessed the activity as implemented.

Activity 2.2.2.5

Build the capacity of all entities responsible for the implementation of the Law on Financing Political Activities, the Republic Election Commission, train judges of misdemeanor courts.	
In charge of activity	• Agency for prevention of corruption • Judicial Academy • Republic Election Commission (REC)
Deadline	Continuous, starting from the first quarter of 2021
Indicators of results	Capacities of all entities responsible for the implementation of the Law on Financing Political Activities and REC have been built and misdemeanor court judges have been trained. Number of held trainings, compared to the number of planned trainings on the Law on Financing Political Activities.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.2.5.

The previous Implementation Report of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption” contains all data regarding the organized trainings on the Law on Financing of Political Activities according to the result indicators.

In the reporting period, seven training sessions were held for political entities on the implementation of the Law on Financing of Political Entities (two online) with a special emphasis on the content of data presentation in the annual report on financing of political entities and the preliminary and final report on election campaign expenses.

Therefore, the Agency assessed the activity as implemented.

Activity 2.2.2.6.

Building the technical capacities of the Anti-corruption Agency for monitoring the financing of political activities, software for online reporting, and better accessibility of published data.	
In charge of activity	• Agency for prevention of corruption
Deadline	Continuously, starting from the IV quarter of 2020
Indicators of results	Built technical capacities that enable effective monitoring monitoring of the financing of political activities.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.2.6.

In 2024, the Agency reported that it is continuously maintaining and improving the software it uses to control the financing of political activities. Also, the Agency reported that the request for the introduction of an electronic signature on the preliminary and final reports on the expenses of the election campaigns of political subjects was implemented, as well as the improvement of the web form and the internal application.

As the technical capacities for controlling the financing of political activities were improved, the Agency assessed the activity as implemented.

Activity 2.2.2.7.

Introduce online training modules related to the implementation of the Law on Financing Political Activities.	
In charge of activity	• Agency for prevention of corruption
Deadline	Continuous, starting from the II quarter of 2020
Indicators of results	Online training modules have been introduced.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.2.7.

A functional online training course on the implementation of the Law on Financing of Political Activities has been established, which allows participants to become more familiar with issues of control of financing of political activities, obligations of political entities, prohibitions on financing, and misuse of public resources. At the end of this training, participants have a final knowledge test and in the reporting period, a total of 98 participants completed this training.

The Agency assessed the activity as implemented.

In the same Section of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”, in this report, the Agency assessed the implementation of activities, which are related to the following benchmark: Serbia provides initial records showing an increase in the number of detected and resolved cases of conflict of interest, including deterrent sanctions. Serbia is conducting training and raising awareness to ensure a better understanding of the concept at all levels.

These are activities no 2.2.3.3, 2.2.3.4. and 2.2.3.5, which are individually presented below.

Activity 2.2.3.3.

Conduct professional training of public administration employees on issues of conflict of interest prevention.	
In charge of activity	• National Academy of Public Administration
Deadline	Continuous
Indicators of results	Professional training of public administration employees on issues of conflict of interest prevention has been conducted. Number of trainings held on the topic of prevention of conflicts of interest, in relation to the number of planned trainings.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.3.3.

In previous reporting cycles, the National Academy of Public Administration submitted data on the conducted trainings. The previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption” contain all necessary data.

This report presents data for the year 2024.

The National Academy of Public Administration has reported that it is preparing and implementing the General Training Program for Civil Servants, the General Training Program for Employees in Local Self-Government Units, the Training Program for Heads in State Authorities and the Training Program for Heads in Local Self-Government Units, which were all adopted by the Government of the Republic of Serbia.

The Introductory Training Program (for the year 2024) for employees in both state administration and local self-government, both for those with secondary and higher education, as part of the preparation program for taking the state professional exam, Constitutional Regulation and Constitutional Regulation and Fundamentals of the State Administration System are provided with the aim of the taking the state professional exam in accordance with the regulations on the program. Topics related to the prevention of conflicts of interest are part of this training.

In the observed period, the online training “Constitutional Order” was completed by 52 out of a total of 286 participants, and the training “State Administration System” by 92 out of a total of 226 participants from the moment of posting on the platform until the end of 2024.

Within the framework of the general training program for civil servants for 2024 – thematic area “Corruption Prevention”, the following training programs were developed: “Prevention of conflicts of interest of public officials, transfer of management rights and restrictions upon termination of public office”, “Lobbying in the Republic of Serbia”, “Verification of property and income of public officials”. In this thematic area, the training “Ethics and Integrity” is planned, which contains a thematic unit on conflicts of interest.

The online training “Ethics and Integrity” was completed by 176 participants out of a total of 220 participants since its launch on the platform. In the reporting period, there were 49 participants in two trainings on the topic “Ethics and Integrity”, 17 participants in the training “Prevention of conflicts of interest of public officials, transfer of management rights and restrictions upon termination of public office”, 34 participants in the training “Lobbying in the Republic of Serbia”, and 24 participants in the training “Verification of property and income of public officials”.

Also, within the thematic area “Inspection supervision”, an online training “Inspection supervision” was developed, which includes the thematic unit “Inspector integrity: conflict of interest”. The online training “Inspection supervision” was completed by 25 out of a total of 189 participants from the moment of posting on the platform until the end of 2024. In addition, the thematic area “Public Procurement” contains seven training programs: “Basics of Public Procurement”, “Public Procurement – Preparation of a Plan”, “Public Procurement – Implementation of the Procedure”, “Public Procurement – Preparation of Tender Documentation”, “Public Procurement – Conclusion, Execution and Amendments to Contracts”, “Public Procurement – Portal”, “Public Procurement of Innovations – Partnership for Innovation”. Within each of the above training programs, a thematic unit is provided that relates to the prevention of conflicts of interest.

Online training on topics in the field of public procurement was completed by: “Basics of public procurement” by nine out of a total of 21 participants, while the same training in the form of consultations was attended by eight participants, online training “Public procurement – development of a plan” by 12 out of a total of 16 participants, four participants attended the consultations, online training “Public Procurement – implementation of the procedure” by seven out of a total of 11 participants, while 15 participants attended the consultations, online training “Public procurement – preparation of tender documentation” by seven out of a total of nine participants, while 17 participants attended the consultations, online training “Public procurement – conclusion, execution and amendments to contracts” by six out of a total of ten participants, while 20 participants attended the consultations, online “Public procurement – portal” by ten out of a total of 11 participants, and two consultations were

attended by another 20 participants, and the online training “Public procurement of innovations – partnership for innovation” was completed by two out of a total of seven participants from the moment of posting on the platform until the end of 2024, while 23 participants attended the webinar.

Within the Sectoral program for continuous professional development of employees in local self-government units, which is part of the General program for training employees in local governments for 2024, within the thematic area “Good governance” the following training programs are envisaged: “Ethics and integrity”, “Development and implementation of local anti-corruption policies” and “Application of the code of ethics of local self-government officials and the code of conduct of civil servants and employees in local self-government units”.

The Training program for managers in state bodies (for 2024) within the training program for civil servants in positions has developed the training “Resolving ethical dilemmas”, which also addresses the topic of conflict of interest. The “Training program for managers in local self-government Units for 2024” has developed the training “Code of ethics for officials in local self-government units”.

Within the “Training program for managers in local self-government units for 2024”, there were ten participants in the training “Code of ethics for officials in local self-government Units”.

Given that, according to the result indicator, training on the prevention of conflicts of interest is conducted continuously, the Agency assessed the activity as implemented.

Activity 2.2.3.4.

Regularly monitor cases of conflict of interest, including the number and degree of sanctions applied.	
In charge of activity	• Agency for prevention of corruption • Republic Public Prosecutor’s Office • Misdemeanour courts
Deadline	Continuous
Indicators of results	• Conflict of interest cases are regularly monitored in the reports of the Agency for prevention of corruption.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.3.4.

In the previous reporting cycles, the Agency submitted data according to the result indicators, on the regular monitoring of cases of conflicts of interest, which are found in the previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

This report presents data for the year 2024.

Number of obligations fulfilled by public officials in accordance with the Law on Prevention of Corruption:

A total of 919 requests were resolved through the application of the Law on prevention of corruption:

- 80 decisions were issued rejecting the request of a public official to perform another public function, or to perform another job or activity;
- In 13 procedures, the decision is not final, delivery is in progress;
- In 42 procedures, the decision is final (in 40 procedures, the public official acted in accordance with the decision, in two procedures, the public official did not act in accordance with the decision, and a procedure was initiated to decide on the existence of a violation of the law);
- In 15 procedures, the deadline for public officials to act is ongoing (to submit evidence that they have ceased to perform one of their public functions);
- In ten procedures, an appeal procedure is ongoing.

Number of measures issued by the Agency that public officials comply with:

By application of the Law on the prevention of corruption, a total of 87 decisions were issued to public officials violating the Law on the prevention of corruption, and 83 measures and four decisions on termination of another public function by force of law (Art. 56, paragraph 8).

Out of a total of 83 measures, the following were issued:

- 73 warning measures;
- Nine measures of public announcement of the decision on the violation of the law;
- One measure of public announcement of the recommendation for dismissal from public function.

Out of the issued warning measures, nine were with an order, according to which public officials acted in eight proceedings, and in one proceeding, an appeal is pending.

Four decisions determining the termination of another public function by force of law are final, in all four proceedings the public official acted in accordance with the decision.

When it comes to decisions in which the measure of public disclosure of the decision on violation of the law was imposed, of which there were nine in total, two decisions are not final, delivery is in progress, while seven decisions are final and the cases are archived.

The decision in which the measure of public disclosure of the recommendation for dismissal from public office was imposed is not final, delivery of the decision is in progress.

Considering that cases of conflict of interest are regularly monitored, and that the Agency has submitted data on this, the Agency assessed the activity as implemented.

Activity 2.2.3.5.

Monitor cases of conflict of interest through the application of the Code of Conduct for Civil Servants, in terms of the number of identified and resolved cases of conflict of interest, including disciplinary measures.	
In charge of activity	• High Civil Service Council
Deadline	Continuous, once per year
Indicators of results	The annual report of the High Civil Service Council contains data on the number of identified and resolved cases of conflict of interest, including disciplinary measures.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.3.5.

According to the result indicators, the High Civil Service Council also submitted data on monitoring cases of conflicts of interest through the implementation of the Code of Conduct for Civil Servants, which can be found in previous Implementation Report of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

The High Civil Service Council has reported that in 2024, in connection with the monitoring of conflicts of interest through the implementation of the Code of Conduct for Civil Servants, three complaints were sent to the High Civil Servant Council against employed civil servants and employees in public institutions and were forwarded to the competent authorities.

This activity is directly related to Activity 2.2.3.5, that is, it is the same report that was referred to in the result indicator for Activities 2.2.3.5. and 2.2.6.3, given that the High Civil Service Council does not resolve conflict of interest cases, but instead monitors the implementation of the Code of Conduct for Civil Servants, collecting data from state administration bodies that directly take care of the application of this act, including cases that involve conflicts of interest.

Starting from 2021, the Agency was convinced that this was a regular annual practice of the of the High Civil Service Council, in support of the prepared reports and the fact that the reports for the previous year are prepared in the current one, which is why the activity was evaluated as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.2.4. Consider what would be an adequate statutory and institutional solution for effectively addressing the issue of illicit enrichment.

The activity in question is Activity no. 2.2.4.1, which is presented below.

Activity 2.2.4.1.

The Ministry is responsible for monitoring the implementation of the Criminal Code and the Law on the Organization and Competence of State Authorities in Combating Organised Crime and Corruption, which requires courts and prosecutors' offices of general and special jurisdiction to submit reports on the number of initiated and completed procedures. The Ministry of Justice compiles a single report, composed of the reports of all the aforementioned authorities, and publishes it on its website.	
In charge of activity	• Ministry of Justice (State Secretary for corruption issues)
Deadline	Continuous, once per year
Indicators of results	A report was prepared and published on the website of the Ministry of Justice. • Annual report of the Agency for prevention of corruption.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.4.1.

The Ministry of Justice also reported on the activity in previous cycles, and the Agency made sure that it was a regular annual practice of the Ministry of Justice, as supported by the reports prepared for 2020, 2021, and 2022, as well as the reports for the previous year. The Ministry of Justice is currently preparing and publishing these reports on their internet platform. Although the result indicator also mentions the Agency, the Agency did not submit any information as it is not competent to monitor the application of the above regulations.

The Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.2.5. Serbia has amended its Law on Free Access to Information of Public Importance, strengthening the administrative capacity of the Commissioner for Information of Public Importance and Personal Data Protection, providing training on handling requests for access to information and initial records of improved access to information, including tasks related to privatisation, activities of state-owned enterprises, public procurement procedures, public spending and donations to political parties from abroad.

The activities in question are Activities no. 2.2.5.1, 2.2.5.3, 2.2.5.4. and 2.2.5.5, which are presented individually below.

Activity 2.2.5.1.

Conduct an analysis of the current application of the Law on Free Access to Information of Public Importance, with special reference to the following areas: - privatization, - public procurement, - public expenditures and - donations to political entities from abroad.	
In charge of activity	• Commissioner for Information of Public Importance and Personal Data Protection, with the participation of civil society organizations.
Deadline	Third quarter of 2020
Indicators of results	An analysis of the current application of the Law on Free Access to Information of Public Importance has been conducted, with special reference to the areas of privatisation, public procurement, public expenditures and donations to political entities from abroad.
Agency's assessment	The activity was implemented in the part referring to the analysis of the current application of the Law on Free Access to Information of Public Importance.
	The activity could not be assessed in the part referring to donations to political entities from abroad.

On the implementation of Activity 2.2.5.1.

The Commissioner for Information of Public Importance and Personal Data Protection has reported that it regularly publishes annual reports on the implementation of the Law on Free Access to Information of Public Importance, which contain relevant analyses divided by thematic areas, and that all the analyses related to the implementation of this regulation are available in its annual reports.

The Commissioner has published the Report on the Work of the Commissioner for Information of Public Importance and Personal Data Protection for 2023, which contains relevant analyses by thematic areas. All questions and analyses related to general problems of the implementation of the aforementioned law can be found on pages 23–37 *Report on the Work of the Commissioner*. Specific statistical indicators on the activities of the Commissioner in the implementation of the Law in 2023 are available on pages 79–105 *Report on the work of the Commissioner*.

The report on the work was submitted to the National Assembly for consideration and was published on the Commissioner's website at the following link: <http://skr.rs/zGHO>.

This activity is directly related to Activity 2.2.5.2. As the Commissioner reported, the amendments to the Law on Free Access to Information of Public Importance were accompanied by analyses that were provided by the Commissioner through annual reports on the implementation of the Law on Free Access to Information of Public Importance, which is why the Agency assessed the activity as implemented.

At the same time, the Commissioner also pointed out that political parties are not bound by the Law on Free Access to Information of Public Importance and that no statement can be made about that area,

so the activity in the part that refers to donations to political subjects cannot be assessed.

The Agency evaluated this activity as two: the part of the activity that refers to donations to political entities cannot be assessed, while the activity in the part that refers to the analysis of the previous application of the Law on Free Access to Information of Public Importance was assessed as implemented.

Activity 2.2.5.3.

Strengthen the personnel capacities of the Commissioner based on the previously conducted analysis of the existing staffing capacities, especially in terms of: - organizational structure; - number of employees; - level of training; in accordance with the amended Rulebook on Internal Organization and Classification of Job Positions.	
In charge of activity	• Commissioner for Information of Public Importance and of Personal Data Protection • National Assembly – Committee for Administrative Affairs
Deadline	Continuous, starting six months from the adoption of amendments to the law
Indicators of results	Amended Rulebook on Internal Organization and Classification of Job Positions. Vacancies were filled in accordance with the amended Rulebook.
Agency's assessment	The activity was implemented.
	The activity was not implemented.

On the implementation of Activity 2.2.5.3.

The Rulebook on Internal Organization and Classification of Job Positions in the Office of the Commissioner for Information of Public Importance and Personal Data Protection from February 2022 envisages 156 executors and three advisers to the Commissioner. At the end of 2023, the number of employees in the Commissioner's Service will be 121 including civil servants and permanent employees.

The Agency assessed the activity as implemented, with the fact that then, in the part related to filling the positions, it was assessed as not implemented.

Activity 2.2.5.4.

Monitoring the application of the Law on Free Access to Information of Public Importance.	
In charge of activity	• Commissioner for Information of Public Importance and Personal Data Protection
Deadline	Continuous, starting from the moment of the coming into effect of the Law
Indicators of results	Description of the situation in the annual report on the work of the Commissioner for Information of Public Importance and Personal Data Protection.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.5.4.

The Commissioner for Information of Public Importance and Personal Data Protection has submitted data according to the results indicators on monitoring the implementation of the Law on Free Access to Information of Public Importance and in the previous reporting cycles.

The Commissioner for Information of Public Importance and Personal Data Protection has submitted detailed information from the monthly reports for 2024 on the application of the Law on Free Access to Information of Public Importance. The Commissioner compiles the Annual Report on the Commissioner's work for the previous year in the current year, so the Annual Report on the Commissioner's work for 2023 was submitted to the National Assembly for consideration, and published on the Commissioner's website.

As the reports of the Commissioner for Information of Public Importance and Personal Data Protection are publicly available, the Agency assessed the activity as implemented.

Activity 2.2.5.5.

Conduct trainings for officials authorised to deal with requests for free access to information, in accordance with case law and international standards.	
In charge of activity	• National Academy of Public Administration • Commissioner for Information of Public Importance and Personal Data Protection
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained officers authorised to deal with requests for free access to information, in relation to the percentage of officials in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.5.5.

The National Academy of Public Administration and the Commissioner for Information of Public Importance and Personal Data Protection has submitted data on the implementation of activities in previous reporting cycles as well, which are found in previous Implementation Report of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

The National Academy of Public Administration has reported that it has prepared and is implementing the General Training Program for Civil Servants, the General Training Program for Employees in Local Self-Government Units, the Training Program for Managers in State Bodies and the Training Program for Managers in Local Self-Government Units, all adopted by the Government of Serbia.

Within the General Training Program for Civil Servants for 2024 – thematic area “Corruption Prevention”, the training program “Right to Access Information of Public Importance” has been developed. Additionally, within the thematic area “Protection of Human Rights and Data Confidentiality”, the training “Basics of Data Processing and Protection” has been developed with a thematic unit on information of public importance. Within the Sectoral Program for Continuous Professional Development of Employees in Local Self-Government Units, which is part of the General Training Program for Employees in Local Self-Government for 2024, within the thematic area “Good Governance”, the training program “Exercising the Right to Access Information of Public Importance” has been envisaged.

The training “Right to Access to Information of Public Importance” was implemented twice and was attended by 114 participants in the reporting period, while the training “Basics of Data Processing and Protection” was attended by 17 participants.

The Commissioner for Information of Public Importance and Personal Data Protection reported that he organized the following trainings: 1) In Novi Pazar, within the framework of the multi-donor project “Support to Strengthening the Rule of Law in the Republic of Serbia”, the training “Free Access to Information of Public Importance – Legislation and Practice” was held, organized by the Commissioner for Information of Public Importance and Personal Data Protection and the Austrian Development Agency (ADA); 2) Lecturers from the Office of the Commissioner held five training sessions for employees of healthcare institutions in the West Bačka (Sombor), North Banat and Central Banat (Zrenjanin), South Banat (Vršac), Raška (Kraljevo) and Rasina (Kruševac) administrative districts. The training sessions were attended by 125 people from 56 institutions. The aim of the training sessions in the field of access to information was to resolve doubts in responding to requests frequently made by parties through authorized attorneys, with a special focus on the types of data submitted, as well as on procedural issues in responding to these requests; 3) Lecturers from the Office of the Commissioner held three training sessions for employees of healthcare institutions from the territory of the South Bačka and Srem administrative districts. The trainings, which are held in cooperation with the Chamber of Healthcare Institutions of Serbia, aim to continue raising awareness among healthcare employees about the rights under the Commissioner's jurisdiction. The emphasis of the training on the implementation of the Law on Free Access to Information of Public Importance was on providing information on the name and surname, as well as other data about employees when acting on a request for free access to information of public importance. The trainings were attended by around fifty people; 4) Lecturers from the Commissioner's Office held two trainings in cooperation with the Chamber of Healthcare Institutions of Serbia, for employees in healthcare institutions in the territory of the city of Belgrade. The main reason for this systematic activity is the challenges in the

implementation of both regulations – on the one hand, the handling of a large number of requests for free access to information (declared through authorized lawyers), and on the other hand, the upcoming regular inspections of the implementation of the Personal Data Protection Act. The goal of the training is greater efficiency in handling these requests and avoiding the errors observed so far, while in the area of data protection, the main scope is to remove doubts in the implementation of the provisions of the law within the competence of the Commissioner and the law regulating the activities of healthcare employees; 5) Two online trainings were held (a lecturer from the Office of the Commissioner and a representative of SIGMA for the Complaints Sector on challenges in acting under the Law on Free Access to Information of Public Importance; 6) Lecturers from the Office of the Commissioner held five trainings for employees of healthcare institutions in Serbia on both laws under the competence of the Commissioner in cooperation with the Chamber of Healthcare Institutions of Serbia. The trainings were held at the General Hospital in Požarevac for employees of healthcare institutions in the Braničevo District, the Health Center in Negotin for employees of healthcare institutions in the Bor District, the Public Health Institute “Timok” in Zaječar for employees of healthcare institutions in the Zaječar District, the Institute for Emergency Medicine in Kragujevac for employees of healthcare institutions in the Šumadija District and the General Hospital in Čuprija for employees of healthcare institutions in the Pomoravlje District. A total of 130 people attended the trainings; 7) A webinar was held for employees of the State Lottery of Serbia. Lecturers from the Office of the Commissioner held a training in the field of the Law on Free Access to Information of Public Importance, which was attended by 30 people; 8) In Novi Sad, within the framework of the multi-donor project “Support to Strengthening the Rule of Law in the Republic of Serbia”, a training “Free Access to Information of Public Importance – Legislation and Practice” was held, organized by the Commissioner for Information of Public Importance and Personal Data Protection and the Austrian Development Agency (ADA); 9) Lecturers from the Office of the Commissioner, in cooperation with the Ministry of Human and Minority Rights and Social Dialogue, held a training on the preparation of information booklets on the work and submission of annual reports for representatives of civil society organizations in accordance with the Law on Free Access to Information of Public Importance. The training was attended by a large number of representatives of these organizations, who raised a number of questions regarding the practical implementation of the Law on Free Access to Information of Public Importance; 10) The Office of the Commissioner was visited by students from the Faculty of Law, University of Belgrade, who are undergoing professional practice. Lecturers from the Office of the Commissioner introduced the guests to the development and competencies of the Commissioner. On this occasion, the students were informed about the basic principles of data processing, the lawfulness of processing, and they were able to learn about protection measures through practical examples; 11) An accredited lecturer from the Office of the Commissioner held a training session on the application of the Law on Free Access to Information of Public Importance for employees of the Ministry of Defense of the Republic of Serbia. The training was attended by 54 members of the Ministry. The aim of the training, in addition to the proper application of the Law, was to resolve problems that arise during the daily handling of requests for free access to information of public importance; 12) Lecturers from the Office of the Commissioner, in cooperation with the Ministry of Human and Minority Rights and Social Dialogue, held a training session for representatives of state bodies at the Palace of Serbia on the preparation of work reports and submission of annual reports in accordance with the Law on Free Access to Information of Public Importance. The training was attended by over 120 representatives of state bodies; 13) Accredited lecturers of the Commissioner's Office held a training session on the application of the Law on Free Access to Information of Public Importance for representatives of faculties and institutes of the University of Novi Sad in the premises of the Rectorate. Thirty people attended the training, and the lecture was followed by a discussion

during which numerous doubts in the application of the law were resolved; 14) Lecturers of the Office of the Commissioner, in cooperation with the Standing Conference of Cities and Municipalities and the Ministry for Human and Minority Rights and Social Dialogue, held an online training for representatives of local self-government units. The topic of the training was the implementation of measures to improve the transparency of the work of authorities under the Law on Free Access to Information of Public Importance, specifically the development of work newsletters and the submission of annual reports; 15) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for healthcare employees in the Niš District; 16) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for healthcare employees in the Pčinj District; 17) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance for employees at the University of Kragujevac; 18) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance for the Chamber of Health Institutions of Serbia for healthcare employees in Pirot; 19) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance for the Network of Inspectors of Serbia in Čačak; 20) Representatives of the Commissioner held a training on the topic of “Free Access to Information of Public Importance Legislation and Practice” intended for public authorities, which was implemented in Kragujevac; 21) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance for the Chamber of Health Institutions of Serbia for healthcare employees in the Jablanica and Toplica districts; 22) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for the Moravički District, Gornji Milanovac; 23) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for the Zlatibor District, Užice; 24) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for the Kolubara District, Valjevo; 25) Representatives of the Commissioner held a training on the implementation of the Law on Free Access to Information of Public Importance to the Chamber of Health Institutions of Serbia for the Mačva District, Šabac.

Taking into account the above, the Agency assessed the activity as implemented.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter “Fight against Corruption”, in this report, the Agency assessed the implementation of activities related to the following transitional benchmark:

2.2.6. Serbia recruits and manages the careers of civil servants based on clear and transparent criteria, with an emphasis on evaluation and demonstrated skills. Serbia develops and implements a mechanism for the effective implementation of the Code of Conduct for Civil Servants. Serbia ensures initial records of sanctions applied in cases of violations of the said Code. Serbia ensures the prevention of corruption through the introduction of an effective internal control system and strengthening the accountability of managers in the public sector.

The activities in question are Activities no: 2.2.6.1, 2.2.6.2, 2.2.6.3, 2.2.6.4, 2.2.6.5, 2.2.6.6, 2.2.6.7. and

2.2.6.8. which are presented individually below.

Activity 2.2.6.1.

Ensure the implementation of the new legal framework based on competencies in the processes of employment, performance evaluation, promotion and career development of civil servants.	
In charge of activity	• Human Resources Management Service • High Civil Service Council • Ministry in charge of state administration and local self-government
Deadline	Continuous
Indicators of results	Competitions, performance evaluation, promotion and career development of civil servants are based on the full application of the system of competencies (recorded in the relevant reports of the Human Resources Management Service).
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.6.1.

The Human Resources Management Service has regularly reported on the implementation of activities, and all data can be found in previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

In 2024, the continuous implementation of activities continued.

The Ministry of State Administration and Local Self-Government continued its work on further improving the regulatory framework. In January 2024, the Government of the Republic of Serbia adopted the Regulation on the Central Personnel Records, which further regulates the content and manner of maintaining the Central Personnel Records and providing data necessary for registration in the Central Personnel Records of state bodies, autonomous province bodies and local self-government units. In accordance with the provisions of the law and the Regulation, all state bodies, AP bodies and local self-government units are obliged to enter personnel data on employees into the human resources management information system. It is also envisaged that the Central Personnel Records will contain, in addition to data on civil servants and employees employed for an indefinite and fixed term, data on the grounds for employment of persons for a fixed term, as well as data on dismissals and court decisions on reinstatement.

The Regulation on the Central Personnel Registry stipulates the dynamics of introducing bodies into the Central Personnel Registry, i.e. that state bodies will be introduced into the Central Personnel Registry starting from the first quarter of 2024, except for the judicial bodies of the Republic of Serbia, which will be introduced into the Central Personnel Registry in the third quarter of 2024, and bodies of autonomous provinces and local self-government units of the Republic of Serbia, which will be introduced into the Central Personnel Registry no later than the first quarter of 2025 – in accordance with the provided technical and technological conditions.

In the first quarter of 2024, the Information System for Supporting Personnel Management is in the process of being installed in the state data center in Kragujevac, where all necessary tests will be carried out (security tests, load tests and verification of two-factor login via e-Government). After the tests are successfully completed, the system will be publicly available for use.

The Human Resources Management Service reported that in 2024, continuous implementation of activities continued.

In the processes of selection in employment, evaluation and support for the career development of civil servants and promotion, the Human Resources Management Service applies an innovative legal framework based on competencies, which dates back to the end of 2018 and was further formulated during 2019. The Service actively applies regulations, provides advisory support in the application of regulations as well as process improvement, and monitors the implementation in practice in state administration bodies and Government services.

In the period from 1 January to 31 May 2024, the Human Resources Management Service announced 563 competitions for filling executive positions by hiring a total of 678 executives. Of the 563 advertised vacancies, 24 are internal and 539 are public.

In the period from July 1 to December 31, 2024, the Human Resources Management Service published 307 vacancies on its website for filling executive positions by hiring a total of 504 executives. Of the 307 advertised vacancies, 24 are internal and 283 are public.

For the purposes of checking behavioral competencies in election procedures in state administration bodies and other state bodies, psychologists conducted a competency assessment for 426 candidates, of which 59 were for the needs of the Second and Third Basic Courts in Belgrade, the Basic Court in Ruma, the Supreme Court, the Constitutional Court, the Commercial Court of Appeal, the Basic Court in Obrenovac and the Basic Court in Užice. 74 candidates for the Tax Administration and 12 candidates in election procedures for appointment to positions.

For the purpose of checking behavioral competencies in election procedures in state administration bodies and other state bodies, psychologists conducted an assessment of competencies for 571 candidates, of which 28 for the needs of the First Basic Court in Belgrade, the Basic Court in Obrenovac, the Basic Court in Ruma, the Basic Court in Užice, the Supreme Court, the Constitutional Court, the Administrative Court in Niš and 50 candidates for the needs of the Tax Administration, 134 candidates for the needs of the Customs Administration and two candidates in election procedures for appointment to positions.

In the first and second quarters of 2024, the Service is working on collecting and processing data for the purposes of creating a Report on the Analysis of the Quality of Filling Vacancies in Competition Procedures in State Administration Bodies and monitoring the implementation of measures to improve the procedures for filling vacancies for the period from January 1, 2023 to December 31, 2023, which was completed and submitted to the Government in the third quarter of 2024.

In the second and third quarters of 2024, the Service worked on creating a Report on the Analysis of the

Quality of Filling Vacancies in Competition Procedures in State Administration Bodies and monitoring the implementation of measures to improve the procedures for filling vacancies for the period from January 1, 2023 to December 31, 2023.

Employees of the Department for the Implementation of the Personnel Selection Procedure also provide expert assistance and support in assessing competencies for other state bodies in which psychologists are not mandatory members of the commissions (Tax Administration, Customs Administration, Anti-Corruption Agency, courts). Since the specific epidemiological situation in 2020, employees of the Department for the Implementation of the Personnel Selection Procedure have intensified consultations (online, phone) and briefings. Also, psychologists who participate in the implementation of the selection procedure as members of the competition commissions have encouraged the holding of the first meetings to familiarize the members of the competition commissions with the new procedures in the process of filling vacancies. Psychologists as members of the competition commissions provide expert and technical support, both to the personnel unit of the body and to the members of the commission.

Employees of the Department for Personnel Selection, through cooperation with the Standing Conference of Cities and Municipalities, have begun providing professional and technical support to local government units. Support and empowerment related to the provision of training related to the conduct of competency-based interviews as part of the behavioral competency assessment. Since the beginning of 2024, more than 200 participants, civil servants employed in local government units, have been trained. Also, psychologists in the Department have been participating in the behavioral competency assessment for local government units since the beginning of the year in the selection procedures for filling executive positions as well as in the procedures for appointing positions. In the period from January 1, 2024 to May 31, 2024, the behavioral competency assessment was carried out through a competency-based interview for 16 candidates. In the period from July 1 to December 31, 2024, the behavioral competency assessment was conducted through a competency-based interview for 35 candidates.

Employees of the Service inform and provide support to civil servants through the “Open Doors for Civil Servants”. The Personnel Management Service is dedicated to more intensive information and attraction of potential candidates. As a communication channel, the Viber group is also operating this quarter, through which candidates have the opportunity to learn about the competencies, phases and techniques of selection, as well as about individual career development opportunities, and to directly ask individual questions to which they receive specific answers. At the same time, the Service’s website is being improved and a “candidate corner” has been opened for the purpose of information, and candidates themselves have the opportunity to ask questions via the website and Facebook, Instagram and LinkedIn pages.

In the third and fourth quarter, employees of the Department created a questionnaire to assess the level of satisfaction of other state bodies with the services of the Service, as well as a questionnaire on the level of satisfaction with the electoral process in local government units. The questionnaire to assess the level of satisfaction of other state bodies with the services of the Service was conducted during November, and the results of this survey are an integral part of the Report on the Quality of Filling Vacancies for 2024.

Regarding the performance evaluation, during the first two quarters of 2024, the Service worked on

collecting data and preparing a Consolidated Report on the implemented procedure for evaluating the performance of civil servants in state administration bodies for 2023. The report will be submitted to the Government of the Republic of Serbia and the department ministry for information in the next quarter.

Regarding the performance evaluation, during the third and fourth quarters of 2024, the Service prepared a Consolidated Report on the implemented procedure for evaluating the performance of civil servants in state administration bodies for 2023 and submitted it to the Government of the Republic of Serbia and the department ministry for information.

In terms of civil servant career development and advancement, as well as further modernization in the area, the Service, in the Career Management Center, applies: analysis of individual potentials, 360-degree assessment, feedback for development purposes, career counseling, development of an individual development plan, coaching and support for development through individual work or work in small groups, for which civil servants apply personally or are referred by their managers. In the reporting period covering the first two quarters of 2024, the following activities were carried out: an analysis of individual development potentials for the purpose of advancement to a management position was carried out for 65 civil servants; one civil servant from local government underwent the procedure for assessing general functional and behavioral competencies for the purpose of taking over through the internal labor market; career counseling was conducted with 69 civil servants; 35 coaching sessions were held; There were no incumbents who underwent a 360-degree feedback assessment for development purposes.

The Service, with the support of the IPA project, worked on the analysis of the existing competency framework and the development of proposals for its amendment, as well as on the analysis of the situation and the development of proposals for appropriate career models for civil servants in state administration bodies.

The Human Resources Management Service continues to strive to improve the human resources management system in terms of employment, evaluation and career development of employees, both through proposals for improving the regulatory framework and through direct improvement of practice.

In terms of civil servant career development and promotion, as well as further modernization in the area, the Service, at the Career Management Center, applies: analysis of individual potentials, 360-degree assessment, feedback for development needs, career counseling, development of an individual development plan, coaching and support for development through individual work or work in small groups, for which civil servants apply personally or are referred by their managers. In the reporting period covering the last two quarters of 2024, the following activities were carried out: an analysis of individual development potentials for the purpose of promotion to a management position was carried out for 68 civil servants; four civil servants from local self-government underwent an assessment of general functional and behavioral competencies for the purpose of taking over through the internal labor market; career counseling was conducted with 69 civil servants; 30 coaching sessions were held; 35 persons in positions underwent a 360-degree feedback assessment for development purposes.

With the support of the IPA project, the Service worked on the analysis of the existing competency framework and the development of proposals for its amendment, as well as on the analysis of the situation and the development of proposals for appropriate career models for civil servants in state administration bodies.

The Human Resources Management Service continues its efforts to improve the human resources management system in terms of hiring, evaluation and career development of employees, both through proposals for improving the regulatory framework and through direct improvement of practice.

Activity 2.2.6.2.

Complete all initiated competition procedures to fill the positions, and initiate competition procedures for all vacancies (including positions currently discharged by acting officials).	
In charge of activity	• Human Resources Management Service • High Civil Service Council • Authorised proposers • Government of Republic of Serbia
Deadline	Continuous
Indicators of results	Competition procedures are being conducted. All competitions started by the competition commissions to fill the positions have been completed.
Agency's assessment	The activity cannot be assessed.

On the implementation of Activity 2.2.6.2.

The Human Resources Management Service and the High Civil Service Council have regularly reported on activities, and all data can be found in the previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

The Human Resources Management Service and the High Civil Service Council have reported that the total number of competitions announced in 2024 during the January–June period was 8 internal competitions. Of the total number of competitions announced, eight internal competitions were completed. In the reporting period, the procedures for five competitions announced in the previous period and carried out in the reporting period were completed – two internal competitions and three public competitions.

The total number of job positions, i.e. appointed positions in the state administration is 424.

The number of persons who are currently in appointed positions, having been appointed by the Government after the conducted competition is 148, at the end of the first half of 2024.

The total number of announced competitions for filling positions in the period July–December 2024 is 18, including 11 internal competitions and seven public competitions. Of the total number of announced competitions, eight competition procedures were completed, including seven internal competitions and

one public competition.

In the reporting period, one competition procedure that was announced in the previous period and conducted in the reporting period was completed, including one public competition.

Total number of jobs – positions in the state administration – 428.

Number of persons occupying jobs that are positions, and which the Government has appointed after the competition – 150, at the end of 2024.

The General Secretariat of the Government reported that the Ministry of State Administration and Local Self-Government has established a Special Working Group for Monitoring the Situation Regarding the Filling of Positions in State Administration Bodies, which began its work in April 2021. The Working Group is composed of representatives of the Ministry of State Administration and Local Self-Government, the Office of the Prime Minister, the General Secretariat of the Government, the Republic Secretariat for Legislation, the National Academy of Public Administration and the Personnel Management Service.

Activity 2.2.6.2. the Agency cannot assess, given that the activity itself, the result indicators and the deadline are defined in a way that prevents monitoring on an annual basis, and therefore assessment, according to the established methodological rules. The completion of all initiated competition procedures for filling positions cannot be monitored on an annual basis, because competition procedures begin in different periods and end in different periods, in accordance with the regulations governing the competition procedure. It is also unclear when the initiated competition procedures are covered by the activity, given that the defined deadline is “continuous”.

In the First Implementation Report, the Agency assessed the completion of procedures that had already begun at the time of adoption of the Revised Action Plan for Chapter 23, assessing the activity as not implemented. However, in all subsequent reporting cycles it was not possible to assess the activity, as defined by the current version of the Revised Action Plan for Chapter 23. The same remark about why monitoring at the annual level is significantly more difficult also applies to the initiation of competition procedures for all vacant positions.

Having all this in mind – the aforementioned activity cannot be assessed.

Activity 2.2.6.3.

Monitor violations of the Code of Conduct for Civil Servants by applying sanctions in case of violation of the Code.	
	• High Civil Service Council
In charge of activity	
Deadline	Continuous, once per year
Indicators of results	Sanctions have been applied in cases of violation of the Code of Conduct. Annual Report of the High Civil Service Council.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.6.3.

The High Civil Service Council has reported that monitoring the implementation of the Code of Conduct for Civil Servants is its regular activity, which stems from the Law on Civil Servants (Article 164a), as well as from the activities defined by the Revised Action Plan for Chapter 23.

Monitoring the implementation of the Code of Conduct for Civil Servants is a regular activity of the High Civil Servants Council arising from the Law on Civil Servants (Article 164a), as well as from the tasks defined in the Action Plan for Chapter 23 and the Action Plan for the Implementation of the National Anti-Corruption Strategy.

At its 26th session on 6 March 2024, the High Civil Servants Council formed a Working Group with the task of preparing a Draft Report on Compliance with the Code of Conduct for Civil Servants in 2023, based on reports from state administration bodies, with data and information necessary for monitoring the Code of Conduct for Civil Servants.

At its 27th session on 29 March 2024, the High Civil Service Council adopted the Report on Compliance with the Code of Conduct for Civil Servants for 2023, with a proposal for measures to improve compliance with the Code. The Report on Compliance with the Code of Conduct for Civil Servants for 2023 was submitted to the Ministry of Public Administration and Local Self-Government and published on the website of the Human Resources Management Service www.suk.gov.rs. In accordance with Article 18a of the Code of Conduct for Civil Servants, the High Civil Servants Council sent a letter to all heads of state administration bodies, Government services and expert services of administrative districts in December 2024 reminding them of their obligation to submit data for 2024 by 31 January 2025 on the number of civil servants with indefinite and fixed-term contracts at the end of 2024, the total number of complaints filed by citizens against the conduct of civil servants due to violations of the Code of Conduct for Civil Servants, the number of proceedings initiated ex officio for non-compliance with the provisions of the Code, the conduct of civil servants, the type of violations of the Code of Conduct for Civil Servants (classified by article) indicated in complaints and on the bodies' own initiatives, data on disciplinary proceedings initiated and disciplinary measures imposed against civil servants for violations of the provisions of the Code of Conduct for Civil Servants, data on resolved cases of conflict of interest and measures imposed against civil servants, and an assessment of the level of compliance with the provisions of the Code of Conduct for Civil Servants. Also, that it is necessary to inform the High Civil Service Council about how citizens are informed about the behavior they have the right to expect from civil servants in that body, as well as about the method of receiving complaints about the behavior of civil servants. It is specifically stated that all data and information processed by the bodies when compiling a report on the implementation of the Code of Conduct for Civil Servants is submitted to the High Civil Service Council, without specifying personal data of the civil servants covered by the report.

The High Civil Service Council recommends that all state administration bodies, government services and expert services of administrative districts work to further improve the quality of work of employees, as well as to improve the methods of receiving citizen complaints and the methods of measuring citizen satisfaction with the services provided (through information provision, enabling the receipt of complaints via the website, social networks, surveying service users, etc.), to cultivate appropriate attention in communication with citizens, providing timely, accurate and complete information, in a polite and dignified manner. It is especially recommended that officials and persons in positions of

authority cultivate an appropriate culture of communication in their teams and ensure that standards of professional communication in working with clients are constantly improved.

The High Civil Service Council recommends that the state administration bodies, government services and expert services of administrative districts include persons engaged on other grounds in the proposed activities from point 1.

This activity is directly related to activity 2.2.3.5, i.e. it is the same report from the result indicators for activities 2.2.3.5. and 2.2.6.3, given that the High Civil Service Council does not resolve cases of conflict of interest, but monitors the implementation of the Code of Conduct for Civil Servants, collecting data from state administration bodies that are directly responsible for the implementation of this act, including cases of conflict of interest.

The Agency has verified that this is a regular annual practice of the High Civil Service Council, which is supported by the reports produced and the fact that reports for the previous year are produced in the current year, which is why the Agency assessed the activity as implemented.

Activity 2.2.6.4.

Improve the process of implementation of program budgeting (operational and methodological improvement of the process of planning and preparation of multi-annual budget at all levels of government).	
In charge of activity	• Ministry of Finance
Deadline	Continuous
Indicators of results	The process of application of program budgeting is continuously improved at all levels.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.6.4.

The Ministry of Finance has reported that, during the preparation of the Priority Areas of Financing for the period 2022–2024 (preparation of the Priority Areas of Financing for the period 2022–2024, new programs, program activities and projects were opened in cooperation with budget users, in accordance with the methodology of the program budget, as analysing the submitted proposals and setting limits, the program structure of budget users was changed).

Although the Ministry of Finance reported that there were no activities in 2023, and having in mind that from the previously submitted information, it can be concluded that the process of implementing program budgeting is being improved, as well as that its essence is such that it does not necessarily require changes on an annual basis (that is, the deadline was not determined in an appropriate way), the Agency assessed the activity as implemented.

Activity 2.2.6.5.

Conduct periodic analyses of the program budgeting process and identify recommendations for its improvement.	
In charge of activity	• Ministry of Finance
Deadline	Continuous, once per year
Indicators of results	Percentage of budget users who have switched to the program budget. Recommendations for improvement have been identified.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.6.5.

In earlier reporting cycles, the Ministry of Finance has submitted data on the conducted analyses, as well as that they have been completed periodically, that is, when such analyses were expedient. In addition, in accordance with the result indicator, the Ministry of Finance has reported that all budget users have now switched to the program budget.

Bearing in mind that the essence of this activity is such that it does not necessarily require changes at the annual level (that is, the deadline was not determined in an appropriate way), the Agency assessed the activity as implemented.

Activity 2.2.6.6.

Improve the methodology of the program budget and prepare a new Instruction in accordance with the recommendations from the analyses under Activity 2.2.6.5.	
In charge of activity	• Ministry of Finance • Republic Secretariat for Public Policies
Deadline	Continuous, once per year
Indicators of results	Percentage of compliance of program structures of budget users with the Instruction for Drafting the Program Budget.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.6.6.

Based on an analysis of the program structure of local self-government units, the Ministry of Finance amended Annex 5 of the Instructions for the preparation of the program budget, adding new program activities to the uniform program structure of the budget of local self-government units. Bearing in mind the result indicator, the Ministry of Finance has also submitted information that the percentage of program structure compliance of budget users with the instructions for the preparation of the program budget is 94% in 2021 (92% in 2020).

Looking at the essence and sequence of the activities, as well as the fact that recommendations for improving the program structure under Activity 2.2.6.5 were indeed given, in this reporting period the Agency assessed the activity as implemented.

The essence of the activity is such that it does not require improvement of the methodology, or the preparation of new instructions on an annual basis, which the Ministry of Finance did in 2021 and reported on this in the previous report. The agency assessed the activity as implemented, and its essence is such that it does not necessarily require changes on an annual basis (that is, the deadline was not set appropriately).

The Agency assessed the activity as implemented.

Activity 2.2.6.7.

Strengthen the staffing capacities of the Central Harmonization Unit (which provides central guidance and coordinates public internal financial control activities) in accordance with the amended Rulebook on Internal Organization and Classification of Job Positions.	
In charge of activity	• Ministry of Finance
Deadline	IV quarter of 2022.
Indicators of results	Vacancies have been filled in accordance with the Rulebook on Internal Organization and Classification of Job Positions
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.6.7.

The Ministry of Finance has reported that, as of September 2023, 11 persons, including an Assistant Minister, were employed for an indefinite period in the Central Harmonization Unit, while 2 employees were hired on the basis of temporary and casual employment contracts. It was also reported that in the coming period, the filling of vacant positions is planned in accordance with the Rulebook on Internal Organization and Classification of Job Positions.

As of December 2024, the Central Harmonization Unit (CHU) has 11 permanent employees, including an assistant minister, while three employees are engaged on the basis of temporary and occasional employment contracts.

In the coming period, it is planned to fill vacant positions in accordance with the Rulebook on Internal organization and systematization of job positions.

The staffing capacities of the Central Harmonisation Unit have been strengthened, but since not all positions were filled in 2023, in line with the set deadline, the Agency did not assess the activity as implemented.

Activity 2.2.6.8.

Increase the number of managers and employees in the public sector who are trained on the essence and importance of the financial management and control system, and increase the number of trained internal auditors.	
In charge of activity	• Ministry of Finance
Deadline	Continuous
Indicators of results	Consolidated annual report on the state of internal financial control in the public sector. Number of newly trained managers and employees in public administration and certified internal auditors, compared to 2013.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.6.8.

The Ministry of Finance has reported that trainings were organized in the previous reporting periods and that the number of employees in the public sector participated in trainings on the essence and importance of financial management and control and the number of trained internal auditors increased. Previous Reports contain all necessary data.

The Central Harmonization Unit (CHU) trained 3.179 managers and employees of users of public funds through basic training for financial management and control (FMC). So far, 1.343 candidates have completed the theoretical training for internal auditors.

Basic training in financial management and control was held from September 30 to October 2, 2024 (61 participants). Basic training in internal audit in 2024 was held in two terms: October 21–25, 2024 (36 participants) and November 4–8, 2024 (36 participants). In addition to these trainings, the CHU also conducts one-day trainings for top managers of UPF. In the reporting period, one-day trainings were held at the Deposit Insurance Agency for 14 participants and at the Republic Health Insurance Fund (RFZO) for 28 participants.

Practical training for internal auditors conducted by mentors from the CHU is continuously conducted.

In this quarter, the exam for obtaining the title of “certified internal auditor in the public sector” was held for 52 candidates and, by December 2024, a total of 686 candidates had obtained the title of certified internal auditor in the public sector.

In addition to these trainings, CHU also conducted one-day trainings for the top managers of public funds users.

During the reporting period, one-day trainings were held at the Administrative Court for 12 participants and at the public enterprise “Gradsko stambeno” for 14 participants.

The Central Harmonization Unit, with the support of the USAID project, held two three-day and three two-day trainings on the topic “Performance Audit” for internal auditors at the central and local levels. In accordance with the changes in internal audit standards, the CHU, with the support of the UNDP project, organized a large gathering / training for about 350 internal auditors in the public sector in order to present them with the changes and how these changes will affect the current work of internal auditors. The CHU plan for the coming period was also presented in terms of what will be improved / changed, in accordance with the new Global Standards for Internal Auditing that will be applied from January 2025.

A video training on FMC, intended for managers and FMC coordinators, has been posted on the NAPA platform. In addition to this, a video training related to internal audit has also been posted. The aforementioned trainings can be accessed and listened to by users of public funds in order to be informed about these areas, but also to prepare for the training for the purpose of certifying internal auditors for obtaining the title of “authorized internal auditor in the public sector” conducted by the CHU. These video trainings have been available on the NAPA platform since September 2024. So far, 121 employees have viewed these trainings.

In addition, two workshops for internal auditors were held. The first workshop was held on the topic of internal mentoring, and the second related to topics such as “Organizational position of internal audit at the local level” and “Labor and legal status of internal auditors”.

Taking the above into account, the Agency assessed the activity as implemented.

In the same Section of the Revised Action Plan for Chapter 23 – Sub-Chapter “Fight against Corruption”, in this report, the Agency assessed the implementation of activities, which are related to the following transitional benchmark:

2.2.7. Serbia effectively implements the new Whistleblower Protection Law and monitors its implementation.

These are activities no. 2.2.7.1, 2.2.7.2, 2.2.7.3. and 2.2.7.4, which are individually presented below.

Activity 2.2.7.1.

Conduct trainings on the application of the Law on the Protection of Whistleblowers for the police, public prosecutors and judges, as well as for special departments in public prosecutor's offices and courts dealing with the suppression of corruption.	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings for police, public prosecutors and judges, as well as for special departments in public prosecutor's offices and courts, have been conducted. Percentage of police officers, public prosecutors and judges trained to apply the Law on the Protection of Whistleblowers, compared to those in need of training.
Agency's assessment	The activity cannot be assessed in the part referring to training the police.
	The activity was implemented in the part referring to training for public prosecutors, judges and special departments for the suppression of corruption in public prosecutor's offices and the courts.

On the implementation of Activity 2.2.7.1.

The Judicial Academy has reported that it conducted a series of trainings for public prosecutors, judges, as well as for special departments for combating corruption in public prosecutor's offices and courts. All data on the conducted trainings can be found in the previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

Now the Judicial Academy has reported that this is a continuous activity, it is expected that the training will continue in the future.

In the reporting period, the Judicial Academy, in cooperation with the “Pištaljka” portal, conducted two one-day trainings on the topic: “Whistleblower protection – domestic and international legal framework”, in Belgrade, Novi Sad, Kragujevac and Niš, for a total of 94 participants.

The Agency evaluated Activity 2.2.7.1 as two because the institution listed as the holder is not competent for all its segments. The Judicial Academy has reported that it is not responsible for the training of police officers under the Law on the Protection of Whistleblowers, and it was designated as the sole holder of this activity. The Agency could not evaluate the activity in the First Implementation Report because it considered the activity as one.

Bearing in mind that the trainings were held in the previous period, as well as that it is planned that the trainings will continue to be conducted, the Agency assessed the activity as implemented in the part of the training for public prosecutors, judges, as well as special departments for combating corruption in public prosecutor's offices and courts. The activity, in the part of police training, still cannot be assessed.

Activity 2.2.7.2.

Monitor the implementation of the Law on Protection of Whistleblowers by preparing the annual report of the Ministry in charge of justice compiled based on periodic reports of competent institutions on actions related to whistleblowers.	
In charge of activity	• Ministry of Justice (State Secretary)
Deadline	Continuous, once per year
Indicators of results	The Ministry of Justice's report, with detailed statistical data, has been prepared and published.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.7.2.

The Ministry of Justice has reported that the Annual Report on the Implementation of the Law on the Protection of Whistleblowers for the period from January 1 to December 31 2023 and published on the official website of the Ministry of Justice, at the following link: <https://www.mpravde.gov.rs/tekst/14518/izvestaji-o-primeni-zakona-o-zastiti-uzbunjivaca.php>

As the report for the previous year is prepared in the current year, the Agency has assessed the activity as implemented.

Activity 2.2.7.3.

Monitor the effects of the Law on the Protection of Whistleblowers with regard to the actions of state authorities in response to whistleblowers' reports.	
In charge of activity	• Ministry of Justice (State Secretary)
Deadline	Continuous, once per year
Indicators of results	The report of the Ministry of Justice on the actions of state authorities in response to whistleblowers' reports has been prepared and published.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.2.7.3.

The Ministry of Justice has submitted information related to the report on the application of the Law on the Protection of Whistleblowers, which was assessed in activity 2.2.7.2.

The Ministry of Justice has reported that the Annual Report on the Implementation of the Law on the Protection of Whistleblowers for the period from January 1 to December 31 2023 and published on the official website of the Ministry of Justice, at the following link: <https://www.mpravde.gov.rs/tekst/14518/izvestaji-o-primeni-zakona-o-zastiti-uzbunjivaca.php>.

Since no assessment of the effects of the Law on the Protection of Whistleblowers was made, the Agency assessed the activity as not implemented.

Activity 2.2.7.4.

Raise citizens’ awareness of the Law on the Protection of Whistleblowers as well as the level of their readiness to act as whistleblowers.	
Activity holder	• Ministry of Justice (State Secretary)
Deadline	IV quarter of 2021
Results indicators	The awareness raising campaign has been conducted.
Rating of the Agency	The activity was not implemented.

On the implementation of Activity 2.2.7.4.

In 2024 the Ministry of Justice reported that the Ministry of European Integration engaged an expert to prepare an analysis of the Law on the Protection of Whistleblowers. The need for possible amendments to the law will be considered based on the above analysis, and a brochure will be created to raise the level of awareness among citizens about the Law on the Protection of Whistleblowers and their willingness to act as whistleblowers. The Ministry of Justice is currently engaged in an awareness-raising campaign on the implementation of the Law on whistleblower protection, through cooperation on the USAID “Public Procurement Improvement Project”.

Since the deadline has expired and the activity has not been completed, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.2.8. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective action where necessary and organising initial records of measurable reduction of corruption in above areas.

The activities in question are Activities no. 2.2.8.3, 2.2.8.4, 2.2.8.7, 2.2.8.8. which are individually presented below.

Activity 2.2.8.3.

Monitoring of measures related to the application of supervision and control in public procurement.	
In charge of activity	• Public Procurement Office • Republic Commission for Protection of Rights in Public Procurement Procedures • Ministry of Finance
Deadline	Continuous, once per year
Indicators of results	Report of the Public Procurement Office on supervision of the implementation of the Law on Public Procurement. Report on the work of the Republic Commission for the Protection of Rights in Public Procurement Procedures. Report of the Ministry of Finance on the supervision of the execution of public procurement contracts.
Agency's assessment	The activity was implemented in the part referring to the competencies of the Public Procurement Office.
	The activity was implemented in the part referring to the competencies of the Republic Commission for the Protection of Rights in Public Procurement Procedures.
	The activity was not implemented in the part referring to the competencies of the Ministry of Finance.

On the implementation of Activity 2.2.8.3.

The Public procurement office and the Republic commission for the protection of rights in public procurement procedures have provided information on the monitoring of the implementation of public procurement regulations in previous reporting cycles.

The Public procurement office reported that, in accordance with the legal obligation set out in Article 180, paragraph 6 of the Public procurement law, it prepares Annual reports on the monitoring carried out for the previous year and submits them to the Government of the Republic of Serbia and the National Assembly of the Republic of Serbia within the legally prescribed deadline.

The Public procurement office continued to monitor the implementation of public procurement regulations. Data on the monitoring conducted for 2023 were submitted to the Government and the National Assembly in the form of the Annual Report on the Monitoring Conducted for 2023, in accordance with the legal deadline, and based on Article 180, paragraph 6 of the Law on Public Procurement (Official Gazette of the Republic of Serbia, no. 91/19 and 92/23). The report was published on the website of the National Assembly and is available at the link: http://www.parlament.gov.rs/upload/archive/files/cir/pdf/izvestaji/14_saziv/KONACAN%20Izvestaji%20o%20sprovedenom%20monitoringu%2027.3.2024.pdf.

During the third and fourth quarters of 2024, the Public procurement office continued to monitor the implementation of public procurement regulations. Data on the monitoring conducted for 2024 will be submitted to the Government and the National Assembly in the form of the Annual Report on the Monitoring Conducted for 2024, in accordance with Article 180. paragraph 6 of the Law on Public

Procurement (Official Gazette of the Republic of Serbia, No. 91/19 and 92/23) no later than 31 March 2025.

The final data of the Republic Commission for the Protection of rights in public procurement procedures will be found in the Annual Report of the Republic Commission for 2024. In accordance with Article 203 of the Law on public procurement, the Annual Report shall be submitted to the National Assembly by 31 March of the current year for the previous year.

The Ministry of Finance reported that it is not preparing a Report on the Supervision of the Execution of public procurement contracts.

The Agency evaluates activity 2.2.8.3 as three activities, as the results indicate that three institutions, each within their respective domains of competence, are implementing this activity. The Agency has confirmed that the Public Procurement Office and the Republic Commission for the Protection of Rights in Public Procurement Procedures follow this regular annual practice, as demonstrated by the prepared reports and the inclusion of the previous year's reports in the current one.

The Agency assessed the activities in the domain of competence of these two institutions as two and evaluated them as implemented. At the same time, the activity, in the part of the competence of the Ministry of Finance, was assessed as not implemented.

Activity 2.2.8.4.

Conduct trainings for police officers, prosecutors and judges in order to process cases of corruption in public procurement more efficiently (compatible with the Financial Investigation Strategy).	
In charge of activity	• Public Procurement Office • Republic Commission for Protection of Rights in Public Procurement Procedures • Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained police officers, public prosecutors, judges and employees and the Public Procurement Directorate, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.8.4.

The Public Procurement Office, the Republic Commission for the Protection of Rights in Public Procurement Procedures and the Judicial Academy, in previous reporting cycles, submitted information on the conducted trainings, which can be found in the previous Implementation Reports of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”.

The Public Procurement Office reported that it conducted the following trainings in 2024: 1) In cooperation with the United States Agency for International Development (USAID), and within the framework of the “Public Procurement Improvement Project”, it organized two trainings for representatives of the police and prosecutor's office on the topic “Advanced Use of the Public Procurement Portal for Police and Prosecutor's Office”, which were held on April 22 and 23, 2024 in Vršac; 2) Representatives of the Office presented to the participants the basic and advanced functionalities of the Public procurement portal, monitoring of public procurement procedures, the role and importance of liaison officers and examples of irregularities in public procurement procedures; 3) In the period 28–29, October 2024, the Public procurement office, within the framework of the Public procurement improvement project of the United States Agency for International Development (USAID), held a training for representatives of prosecutors' offices on the topic “Advanced use of the public procurement portal for prosecutors' offices”. At the training, representatives of prosecutors' offices were introduced to the advanced functionalities of the Public procurement portal, which are important for the performance of the activities of the authorities. The second part of the training was dedicated to the exchange of experiences regarding irregularities in public procurement procedures.

The Judicial Academy reported that in 2024 they: 1) Conducted three one-day seminars on the topic: “Offences in the field of public procurement” in Niš, Kragujevac and Novi Sad for a total of 54 participants; 2) Four two-day seminars on the topic: “Public procurement – abuses: red flag methodology”, in Niš, Kraljevo, Novi Sad and Belgrade, for a total of 77 participants; 3) One one-day seminar on the topic: “Public procurement – abuses: assessment of evidence in criminal proceedings conducted regarding abuses related to public procurement” in Belgrade, for a total of 31 participants; 4) In cooperation with the German International Cooperation Agency (GIZ), organized a one-day seminar on the topic: “Prevention of money laundering, FATF recommendations and immediate results” in Belgrade, for a total of 26 participants.

The Judicial Academy reported to the Agency that, in cooperation with USAID, it conducted: 1) One-day training in Belgrade, on the topic: “Public procurement – criminal law aspect”, for a total of 37 participants; 2) Two-day training in Vršac, on the topic: “Public procurement – Training for advanced use of the public procurement portal for the police and prosecutor's office”, for a total of 12 participants; 3) Two two-day trainings in Niš and Belgrade, on the topic: “Public procurement – Effective planning of investigations in cases related to public procurement”, for a total of 21 participants; 4) In cooperation with USAID, a two-day training in Sokobanja, on the topic: “Complex violations in the field of public procurement”, for a total of 28 participants; 5) A four-day workshop in Belgrade, in cooperation with GIZ, on the topic: “Financial investigations”, for a total of 19 participants; 6) In cooperation with the OSCE Mission, a three-day training was conducted in Niš, on the topic: “Fighting money laundering”, for a total of 17 participants.

The Agency assessed the activity as implemented.

Activity 2.2.8.7.

Prepare and present the Impact Assessment of the measures taken to reduce corruption in the field of public procurement	
In charge of activity	• Agency for prevention of corruption
Deadline	I quarter of 2022
Indicators of results	An impact assessment of measures taken to reduce corruption in the field of public procurement was prepared and presented to the National Assembly.
Agency's assessment	The activity was implemented in the part related to the preparation of the Impact Assessment.
	The activity cannot be assessed in the part related to the preparation of the Impact Assessment.

On the implementation of Activity 2.2.8.7.

The Agency has reported that it prepared the Impact Assessment in the second quarter of 2022, and that it submitted the document to the National Assembly on 28 June 2022. The National Assembly published the Impact Assessment on its website.

In a communication dispatched to the National Assembly, the Agency indicated the need to present this document; however, whether and how it will be presented to the National Assembly, and what the outcome of the presentation will be, depends on the National Assembly, not on the Agency. The appropriate presenter of the Impact Assessment has not been defined, i.e. the Agency was listed as the sole entity in charge of activities both in the part of implementation and in the part of presentation of the Impact Assessment.

The Agency evaluated the activity in the part of the preparation of the Impact Assessment as implemented, and due to the inappropriate holder, it could not assess the activity in the part related to the presentation of this document.

The Agency has counted, presented and evaluated the activities 2.2.8.7, 2.2.9.4, 2.2.10.3, 2.2.10.8, 2.2.10.13, 2.2.10.21, 2.2.10.29. and 2.2.10.34. through two sub-activities, because one relates to the implementation of the Assessment of the impact of measures taken to reduce corruption in eight risk areas, and the other to its presentation. The Agency did not present them individually in this report.

Activity 2.2.8.8.

Take corrective measures based on the findings from the Impact Assessment.	
In charge of activity	• All relevant institutions, based on the findings from the Impact Assessment
Deadline	I quarter of 2023
Indicators of results	Corrective measures based on findings from the Impact Assessment were undertaken.
Agency's assessment	The activity cannot be assessed.

On the implementation of Activity 2.2.8.8.

The competent authorities did not implement corrective measures because the Report on the Impact Assessment of Strategic Documents in the Area of the Fight Against Corruption (Impact Assessment of measures taken to reduce corruption in the field of eight risky areas: public procurement, privatization, health, taxes, education, police, customs and local self-government) does not contain corrective measures for each of the areas that are particularly risky.

The Agency has counted and evaluated Activities 2.2.8.8, 2.2.9.5, 2.2.10.4, 2.2.10.9, 2.2.10.14, 2.2.10.22, 2.2.10.30, 2.2.10.35, as one, and did not present them individually in this report.

Namely, in the Report on the Impact Assessment of Strategic Documents in the Area of the Fight Against Corruption, prepared by the Agency, it is indicated that the aim of the assessment of the impact of strategic documents is to determine whether any progress has been achieved in the fight against corruption in areas of special risk, and if so, is it a consequence of the application of strategic documents or is there some other explanation for the resulting change (if it happened). As the impact assessment has been presented, corrective measures were planned based on the analysis of the risk of corruption in areas of special risk and not on the basis of an impact assessment; therefore, concrete measures for each of the particularly sensitive areas did not result from the assessment of the impact of strategic documents and could not be directly undertaken.

Bearing in mind the above, the Agency could not assess the activity.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, the Agency assessed the implementation of activities related to the following benchmark:

2.2.9. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective measures when necessary, and organising initial records of measurable reductions of corruption in said areas.

The activity in question is 2.2.9.1, which is presented below, while activities 2.2.9.2, 2.2.9.3, 2.2.9.4, 2.2.9.5. which are presented in the section of the Report: Transitional benchmark 2.2.8.

Activity 2.2.9.1.

Establish internal control in all public enterprises.	
In charge of activity	• Ministry of Finance (Central Harmonization Unit) • All public enterprises
Deadline	Fourth quarter of 2022
Indicators of results	As evident from the Annual Report of the Central Harmonisation Unit, internal control has been established in all public enterprises.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.2.9.1.

In previous reporting cycles, the Ministry of Finance has reported that beneficiaries of public funds are independently establishing internal control in their organizations based on the principle of a decentralized system of internal controls, while the Sector – Central Harmonisation Unit of the Ministry of Finance, is providing a legal and methodological framework and continuously conducting training and promotional activities to raise awareness of the importance and obligation of establishing a system of internal control.

The Ministry of Finance has reported that beneficiaries of public funds are independently establishing internal control in their organizations based on the principle of a decentralized system of internal controls, while the Sector – Central Harmonisation Unit of the Ministry of Finance, is providing a legal and methodological framework and continuously conducting training and promotional activities to raise awareness of the importance and obligation of establishing a system of internal control.

3,779 users of public funds (PBUs) submitted the Annual Report on the Financial Management and Control System (FMCS) for 2023 and all received reports were included in the analysis. According to the processed data, a total of 1,420 PBUs submitted an IA report for 2023.

Public enterprises (PEs) at the central level of the Republic of Serbia that submitted a FMC report manage 99.93% of the total revenues of the PC group. From the submitted reports, it was noted that three PEs (6.98%) did not meet the basic requirement for establishing a FMC system, which implies having business process maps, a risk register and a risk management strategy.

Out of a total of 48 public enterprises and capital companies at the central level, which perform activities of general interest and which implement the Law on Public Enterprises, 30 have a functional IA, which is 62%, and the coverage of total revenues for 2023 in this category is 98%. According to the Law on the Budget System, users of public funds are obliged to establish a financial management and control system.

According to this law, the head of the user of public funds is responsible for establishing a financial management and control system.

Bearing in mind the above, the Ministry of Finance further pointed out that this activity (2.2.9.1) is not defined in line with Article 81, paragraph 4 of the Law on the Budget System, because in addition to public enterprises, the Ministry of Finance / Sector - Central Harmonisation Unit was also listed as the carrier of activities related to the establishment of internal control in public enterprises (beneficiaries of public funds).

According to the above Law, beneficiaries of public funds should report to the Minister of Finance about the implementation of internal control in their organizations, whose status is monitored by the Sector – Central Harmonisation Unit, preparing – based on individual reports of beneficiaries of public funds - an annual report on the state of internal financial control in the Republic of Serbia, which the Minister then uses to report to the Government.

The list of the listed public enterprises is changing, reorganizations and restructurings, spin-offs and mergers are taking place, therefore the situation is changing. It should be borne in mind that in 2017 all PEs submitted a report on FMC and performed a self-assessment of the organization from the point of view of establishing FMC (therefore, it cannot be considered that certain public enterprises, or those changed due to reorganization, which did not submit a report on internal controls in subsequent years did not establish FMC, i.e. an internal control system).

Assuming that from the point of view of financial management and control, the issue of corruption as a narrower term is covered by the term irregularity (as defined in Article 2 of the Law on the Budget System), and bearing in mind that this activity is part of the Action Plan related to the issue of prevention of corruption, the Central Harmonization Unit had already implemented appropriate activities related to the establishment of a system for management of irregularities within the jurisdiction defined by law and its scope of work. Namely:

- The definition of irregularity was introduced in the Law on the Budget System;
- The Rulebook on common criteria and standards for the establishment, operation and reporting on the financial management and control system in the public sector („Official Gazzete of the Republic of Serbia no. 89/2019), obliges managers of users of public funds to establish a system for detecting, recording and acting on notifications of suspected irregularities, as well as a reporting system, and to take measures necessary to reduce the risk of irregularities;
- As an aid in understanding and implementing the system for irregularities in practice, the Central Harmonization Unit has developed “Guidelines for managing irregularities” for the beneficiaries of public funds;
- The trainings that the Central Harmonization Unit regularly holds for employees and managers on financial management and control contain a section devoted to irregularities;
- The Central Harmonization Unit continuously conducts promotional activities through electronic and print media, organises meetings and trainings to raise awareness of the importance and obligation of establishing internal control systems; has published on the Ministry’s website an extensive set of practical guidelines to help with the implementation, better understanding and self-study on financial management and control and internal audit, which are available for download; and informs the most important beneficiaries of public funds (from the point of view of the number of employees and their budgets) about the obligation to establish a system and appropriate reporting.

In the reporting period, CHU, with the support of KPMG, prepared video trainings for financial management and control, intended for managers and coordinators for FMC. In addition to this, video training related to internal audit was also prepared. The aforementioned trainings are in the final stage of production.

In addition, the Conclusion by which the Government of the Republic of Serbia adopts the consolidated annual report individually highlighted the most important beneficiaries of public funds, among them public enterprises, which were given specific recommendations for the improvement of the FMC and internal audit.

Central Harmonization Unit – Implementation of activities is ongoing, in the sense that beneficiaries of public funds independently establish internal control in their organizations according to the principle of a decentralized internal control system, while the Ministry of Finance Sector – Central Harmonization Unit – provides the legal and methodological framework and continuously conducts training and promotional activities to raise awareness of the importance and obligation of establishing an internal control system.

For 2023, an overview of activities is provided within the Consolidated Annual Report on the State of Internal Financial Control in the Public Sector (CAR) for 2023, which was adopted by the Conclusion of the Government of the Republic of Serbia on August 29, 2024. The conclusion ordered each individual priority UPF, which had not done so, to establish an internal audit function with at least three internal auditors, to form a unit with at least three internal auditors, i.e. to fill the positions for internal auditors and report to the CHU on the achievements within six months. The report is available on the website of the Ministry of Finance in the section related to the CHU.

According to the Law on the Management of business companies owned by the Republic of Serbia, out of a total of 141 companies, 41 companies, or 29%, have a functional audit. With the aim of ensuring the requirements of the negotiating chapters, activities were undertaken for the purpose of further development and implementation of the IFCPS, which relate to the entry into force of amendments to the Law on the Budget System (LoBS), namely:

- the most significant in terms of effects is the introduction of penal provisions to ensure that budget users, as well as mandatory social insurance organizations, act in accordance with the obligations set out in the aforementioned law, which relate to the establishment and provision of conditions for the adequate functioning of the internal audit function, timely submission of reports on the functioning of the internal audit and on the state of the financial management and control system to the Ministry of Finance. Penal provisions will particularly stimulate central-level institutions that are explicitly listed in the IA Rulebook to ensure adequate IA capacities.

In addition, the effective function of the Internal Audit will also be facilitated by the following amendments integrated into the Law on the Budget System (LoBS):

- ensuring a unified approach to organizing the internal audit function at the level of local government units, unifying work aspects and consistency of the positions of heads of internal audit units,
- prescribing that internal audit has unlimited access to all organizational data, as well as enabling the organization's management to protect the confidentiality of internal audit reports (if necessary) in accordance with the regulations governing data confidentiality
- establishing and maintaining a public register by the CHU with data on the established internal audit function at users of public funds, engaged auditors, etc.

The amendments to the Law on Budget System that entered into force on November 28, 2024, and primarily the introduction of penal provisions, should have the effect of raising awareness among public sector management in the medium term on the importance of internal control systems, to ensure the independence of the internal audit function at the local government level, as well as the continuity of the position of heads of internal audit units, and to accelerate the process of establishing the function

and regular reporting.

In Activity 2.2.9.1. the holder of the activity is not properly defined because – as the Ministry of Finance itself stated in the report – this institution, based on individual reports of users of public funds, does prepare an annual report on the state of internal financial control in the Republic of Serbia. However, since the data submitted by the Ministry of Finance clearly show that internal control has not been established in all public enterprises, the Agency assessed the activity as not implemented.

In this report, in the same Section of the Revised Action Plan for Chapter 23 – subchapter ‘Fight against Corruption’, the Agency assessed the implementation of activities related to the following benchmark:

2.2.8. Serbia is implementing and assessing the impact of measures taken to reduce corruption in areas of risk (health, taxes, customs, education, local self-government, privatisation, public procurement and police), taking corrective action where necessary and organising initial records of measurable reduction of corruption in above areas.

Activities no. 2.2.10.3, 2.2.10.4, 2.2.10.8, 2.2.10.9, 2.2.10.13, 2.2.10.14, 2.2.10.21, 2.2.10.22, 2.2.10.29, 2.2.10.30, 2.2.10.34. and 2.2.10.35. that are presented in the section of the Report: Transitional benchmark 2.2.8, while the activities no. 2.2.10.16, 2.2.10.18, 2.2.10.23, 2.2.10.24, 2.2.10.25, 2.2.10.26, 2.2.10.31. were presented individually below.

Activity 2.2.10.16.

Develop mechanisms to strengthen the integrity of police officers: a) Carry out a corruption risk analysis for job positions in the police; b) Create preconditions for normative regulation; strengthen integrity (change procedures and work methodology).	
In charge of activity	• Ministry of the Interior
Deadline	Point a) – fourth quarter of 2021
	Point b) – third quarter of 2020
Indicators of results	Analysis of the risk of corruption in the Ministry of Interior has been created. A register of risks has been created. Procedures of the methodologies of work and actions in the Sector have been created.
Agency's assessment	The activity was not implemented in point a).
	The activity was implemented in point b).

On the implementation of Activity 2.2.10.16.

Regarding point a), the Ministry of the Interior has reported that the work of working groups in the organizational units of the Ministry of the Interior related to corruption risk analysis was realised in the course of 2021 and 2022. The Ministry of Interior further reported that the Internal Control Sector has formed working groups to conduct risk analyses in all organizational units of the Police Administration, that the activities of most working groups are nearing completion. The results of the conducted corruption risk analysis, will serve as the basis for the development of the Integrity Plan of

the Ministry of Interior.

In 2023, the Ministry of the Interior has reported that the largest number of working groups were in the final stage of developing a corruption risk analysis. Until now, analyses of the risk of corruption have been completed in the following organizational units: Sector for Emergency Management; Traffic Police Administration; Border Police Directorate; Special Anti-Terrorist Unit; Serbian Police Helicopter Unit; Coordination Directorate for Kosovo and Metohija; Police Administration for the City of Belgrade; Police Administration in Požarevac.

The Agency counted Activity 2.2.10.16 as two activities, because of the different deadlines for the implementation of the two activity's segments. We can note that point a) was assessed as not implemented, bearing in mind that based on the report of the Ministry of the Interior, the analysis of the risk of corruption has not been fully completed. Regarding item b), the Ministry of Interior has reported that, in addition to the already adopted by-laws in 2018 prescribed by the Law on Police, and the Code of Police Ethics, the Ministry of the Interior also issued the Instruction on Gifts in the Ministry of Interior on August 24, 2021, and prerequisites for strengthening integrity were created.

Given that the preconditions for strengthening integrity have been created, the Agency assessed point b) as implemented, However, it assessed point a) as not implemented because the corruption risk analysis is not fully completed.

Activity 2.2.10.18.

Continuous education of employees in the Internal Control Service and all employees in the Ministry of Interior regarding integrity.	
In charge of activity	• Ministry of the Interior • Criminal Police Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of employees in the Ministry of Interior trained on the topic of integrity, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.10.18.

The Ministry of the Interior has reported on the implementation of activities, and all data on the trainings held in the previous period can be found in previous reports.

From 29 to 31 January 2024, two representatives of the Internal control sector participated in a workshop on the development of the monograph "Detecting and Proving Criminal Acts of Corruption", which was held in Šabac.

In March 2023, a representative of the Internal control sector participated in the anti-corruption symposium in the United States of America. The participation of representatives of the Ministry of Internal Affairs in the aforementioned event was organized by the International Law Enforcement Academy (ILEA).

From 3 to 5 June 2024, a training course on conducting advanced financial investigations was held in Vrnjačka Banja, attended by 20 police officers from the Internal control sector. The training was conducted with the support of the OSCE Mission to Serbia.

In the period from 10 to 12 June 2024, a training for representatives of the corruption risk assessment working groups was held in Vrnjačka Banja, in which, in addition to other representatives of the Ministry of Internal Affairs, eight representatives of the Internal control sector also participated. The training was conducted with the support of the OSCE Mission to Serbia.

In order to strengthen the integrity of employees, and in accordance with the plan of preventive and educational measures and actions, lectures were held in the organizational units of the Police Directorate, the Center for basic police training and the University of criminal investigation and police study in the first half of 2024.

The topics covered during these lectures were: Code of police ethics, integrity, standards of police conduct, principles of performing police work, etc., and one of the lecturers was also a representative of the Internal control sector.

Considering the trainings, the Agency assessed activity as implemented.

Activity 2.2.10.23.

Establish a Working Group in the Ministry of Justice to consider the initiative of the Customs Administration (based on the Corruption Risk Analysis of the legal framework of the customs system) to amend the Criminal Procedure Code, and act in accordance with the conclusions (link: Activity 2.3.7.2).	
In charge of activity	• Ministry of Justice • Customs Administration, Ministry of Finance • Government of Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	Creation of the working group: first quarter of 2021 Amendments and supplements to regulations: up to the fourth quarter of 2022
Indicators of results	The working group has been created. Amendments and supplements to the law have been adopted, in accordance with the conclusions of the working group.
Agency's assessment	The activity was not implemented in the part referring to the amendment of the regulations.
	The activity was implemented in the part referring to the creation of the working group.

On the implementation of Activity 2.2.10.23.

The Ministry of Justice has reported that, by the Decision of the Minister of Justice no. 119-01-126/2021-05 of May 12, 2021, a Working Group for the Analysis of the Criminal Procedure Code was established with the aim of identifying and eliminating its weaknesses and shortcomings, and drafting a working text of the Law on Amendments and Supplements to the Criminal Procedure Code based on the results of the Analysis.

The Agency assessed the education activity of the Working Group as implemented, while the activity in the part of amending regulations was assessed as not implemented.

Activity 2.2.10.24.

Train customs officers in accordance with the new regulations.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained customs officers, in relation to those in need of training
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.2.10.24.

The Customs Administration has reported that Activity 2.2.10.24 of the Revised Action Plan for Chapter 23 was conditioned by the amendments to the Criminal Procedure Code (Activity 2.2.10.23). The amendment of the Criminal Procedure Code is under jurisdiction of Ministry of Law, and as the Code has not been amended yet, it was not possible to implement Activity 2.2.10.24.

The Agency assessed the activity as not implemented.

Activity 2.2.10.25.

Strengthen the capacity of the Internal Control Department by procuring adequate supporting equipment, IT equipment and uniforms, and by employing 15 people.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Continuous
Indicators of results	Capacities have been strengthened (appropriate supporting equipment, IT equipment, uniforms, etc.). The number of systemised job positions has been increased by 13 in 2021.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.10.25.

The Customs Administration reported that it has taken steps to achieve the prerequisites for strengthening staff capacities and, accordingly, increased the number of systematized jobs. The Customs Administration reported that in 2024, customs officers did not receive new uniforms, as well as new IT equipment, as they received it in 2022. It further reported that in 2024, there were no new employees in the Internal control department, due to limited budget funds.

The Agency assessed the activity as implemented.

Activity 2.2.10.26.

Install video surveillance in customs offices and at border crossings, with a centralised signal recorder in the Customs Administration and a possibility of the Customs Administration to access video surveillance in each facility in real time.	
In charge of activity	• Customs Administration, Ministry of Finance
Deadline	Fourth quarter of 2021
Indicators of results	Video surveillance has been installed.
Agency's assessment	The activity was not implemented

On the implementation of Activity 2.2.10.26.

The Customs Administration has reported that the activity was not implemented, and that, in the earlier period, the activity was implemented by the Ministry of the Interior through the “Integrated Border Management” project, and since April 2019, the establishment of video surveillance has been transferred to the jurisdiction of the Republic Directorate of the Property of the Republic of Serbia. The Customs Administration, through the new strategy of integrated border management for the period 2022–2024, in “Interagency Cooperation” Section, proposed the procurement of video surveillance at all border crossings.

The Customs Administration reported that the activity was not implemented, because it is a complex cross-sectoral activity that is closely linked to the Integrated Border Management Strategy of the Republic of Serbia for the period 2022–2027. The Action Plan for the Implementation of the Integrated Border Management Strategy for the period 2022–2024 – Measure 5.4.3. “Establish a joint video surveillance system at border crossings” planned activity 5.4.3.2. “Procurement of installations, equipment and software for the establishment of a joint video surveillance system” at border crossings, with the competent authority, the Republic Property Directorate of the Republic of Serbia, which is responsible for the implementation of the activity. Implementation of activity 5.4.3.3. “Establish joint video surveillance”, for which the Ministry of Interior, the Border Police Directorate, the Ministry of Finance, the Customs Directorate and the Ministry of Forestry, Forestry and Marine, the Veterinary Directorate and the Plant Protection Directorate are responsible, is foreseen after the implementation of activity 5.4.3.2. which has not been implemented.

Also, the Action Plan for the period 2024–2025 year for the implementation of the National Strategy for the Fight against Corruption for the period 2024–2028 year, within the framework of measure 2.4.

“Strengthening the efficiency of the customs system” foresees activity 2.4.3. “Development of an analysis of the riskiest border crossings and goods posts from the aspect of corruption in order to define the needs for installing video surveillance and the dynamics of its introduction” (with a completion deadline: III quarter of 2025) and activity 2.4.4. “Installation of video surveillance at freight checkpoints in accordance with the analysis from activity 2.4.3” (with completion deadline: IV quarter 2025).

Bearing in mind the above, the Agency assessed the activity as not implemented.

Activity 2.2.10.31.

The assemblies of the autonomous provinces and local self-governments are adopting local action plans and establish permanent working bodies to monitor the implementation of local action plans.	
In charge of activity	For adoption: • Assemblies of the autonomous provinces and local self-governments
	For reporting: • Agency for prevention of corruption
Deadline	For adoption: fourth quarter of 2020 For reporting: continuous, until the local self-governments and autonomous provinces fulfil their obligations
Indicators of results	Local action plans have been adopted. Working bodies to monitor their implementation have been established. The assemblies of local self-government units and the territorial autonomy have adopted their anti-corruption plans and formed bodies to monitor their implementation in line with the model of the Agency for prevention of corruption.
Agency’s assessment	The activity was not implemented in the part that refers to the adoption of local anti-corruption plans and the establishment of bodies to monitor their implementation.
	The activity was implemented in the part that refers to reporting on the adoption of local anti-corruption plans and the establishment of bodies to monitor their implementation.

On the implementation of Activity 2.2.10.31.

All data on local anti-corruption plans can be found in previous reports.

In the period from the beginning of April 2017, when the Agency for the Prevention of Corruption (hereinafter: the Agency) published the “Model of a Local Anti-Corruption Plan” (hereinafter: the Model LAP), until December 16, 2024, a total of 117 (local government units (hereinafter: LGUs) adopted local anti-corruption plans (hereinafter: LAPs), or 80.68% of the 145 LGUs subject to this obligation (excluding the territory of Kosovo and Metohija). 27 LGUs informed the Agency that they had not developed a LAP, and one LGU never submitted data on the development of a LAP and the formation of a body for its monitoring.

On August 1, 2018, the Provincial Government adopted the Draft Provincial Assembly Decision on the Provincial Anti-Corruption Plan (PAP) and sent it to the Assembly of the Autonomous Province of Vojvodina (AP Vojvodina) for consideration and adoption. At the session of the Assembly of the AP Vojvodina, held on September 18, 2018, the Provincial Assembly Decision on the Provincial Anti-Corruption Plan was made, by which this plan was adopted. A body for monitoring the implementation of the LAP has not been formed.

Of the total of 117 anti-corruption plans submitted by local self-government units to the Agency, 101 (86.32%) were developed in accordance with the LAP Model, 12 (10.25%) were developed partially in accordance with the Model, three adopted plans (2.56%) do not comply with the Model in either form or content, and one local self-government unit (0.85%) did not provide sufficient data to assess whether the LAP was developed in accordance with the Model.

The reasons for the partial compliance of certain LAPs are reflected in the fact that during the development of the plans, there were no representatives of civil society in the working groups for the development of the LAP, in some reports on the adoption of the LAP, local self-government units did not adequately explain why certain measures were not taken from the Model, certain activities were not precisely formulated, etc.

A total of 42 LGUs have formed a body that will be responsible for monitoring the implementation of the LAP, of which 29 were formed mainly in accordance with the Agency Model, two partially, eight with significant deviations, while for three there is insufficient data to provide an assessment of compliance.

While forming the bodies to monitor the implementation of LAP, i.e. while electing members of said bodies, some of the commissions did not include representatives of the civil society, some self-government units had to re-announce the public competition for the election of body members because there were not enough candidates, while some municipalities formed a temporary body, in accordance with the supplemented Model, after two conducted public competitions in which no candidates applied, while some LGUs have formed a body from among employees / elected persons in the LGU, which is contrary to the LAP Model, or the amendment to the LAP Model.

If we summarize the data on the development of the LAP and the formation of a body for its monitoring at the end of the last reporting period in 2024, we can conclude that three LGUs (the City of Čačak, the Municipality of Bačka Topola and the Municipality of Čoka) reported to the Agency on the adoption of the LAP during this year, of which the Municipality of Bačka Topola adopted the LAP in 2019, the City of Čačak on December 30, 2022 and the Municipality of Čoka in 2024. When it comes to the formation of a body for monitoring the implementation of the LAP, one local government – the municipality of Merošina – fulfilled this task during 2023, while the municipality of Veliko Gradište established a body for monitoring the implementation of the LAP on 21 June 2022, but reported on it only in 2024. Other local governments that reported during 2024 that they had established a body for monitoring the implementation of the LAP (the municipalities of Golubac and Babušnica) did not receive a positive assessment from the Agency because they established a body from among employees / elected persons in the local government. The municipality of Mionica carried out a technical audit of the existing anti-corruption plan during 2024 due to the expiration of the period for which it was adopted.

Taking into account the above, from the beginning of the implementation of the LAP mechanism until the end of 2024, we can conclude that a total of 29 LGUs adopted the LAP and formed a body to monitor its implementation, mainly in accordance with the Agency Model, thereby fulfilling their obligation under activity 2.2.20.31. of the Action Plan for Chapter 23.

The Agency assessed activity 2.2.10.31. as two, bearing in mind that its segments are separate, both thematically and by carrier.

Having in mind that the deadline for the adoption of the LAPs was the fourth quarter of 2020, and that not all local self-government units have fulfilled this obligation, the Agency assessed the first activity as not implemented. The second activity was assessed as implemented because the Agency continuously monitors and reports on the adoption of LAPs, as well as on the establishment of bodies to monitor their implementation.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.2.11. Ensure the involvement of civil society in the anti-corruption program.

The activities in question are Activities no. 2.2.11.1, 2.2.11.2. and 2.2.11.3, which are individually presented below.

Activity 2.2.11.1.

Implement joint activities to encourage citizens and make their participation in the fight against corruption more efficient.	
In charge of activity	• Office for Cooperation with Civil Society
Deadline	Continuous
Indicators of results	Joint activities aimed at encouraging citizens and making their participation in the fight against corruption more efficient are continuously implemented.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.11.1.

The Ministry of Human and Minority Rights and Social Dialogue submitted data on joint activities in previous reporting cycles.

Ministry of Human and Minority Rights and Social Dialogue has reported that in the course of 2023, the Government of the Republic of Serbia, at the session held on September 28, 2023, 02-8792/2023 on the establishment of the Council for the creation of a stimulating environment for the development of civil society

The first session of the Council was held on December 5, 2023, at which the Rules of Procedure of the Council were adopted and regional experiences in the work of such a Council were presented, and at which a common position was taken that the Council should make a recommendation to the ministries that allocate financial resources for programs and projects of public interest implemented by associations and other civil society organizations. During January 2024, a recommendation was sent to the competent state administration bodies that allocate financial resources for programs and projects of public interest implemented by associations and other civil society organizations to pay additional attention when implementing the procedures stipulated in the regulations governing the financing procedure in all phases of this process, and especially those segments of the competition cycle that relate to the use of approved funds and monitoring the implementation of approved programs and projects: reporting and monitoring of submitted reports, monitoring visits and preventing conflicts of interest of users, as well as publishing reports of the competent body.

This recommendation also applies to all other competent authorities that allocate financial resources for programs and projects of public interest implemented by associations and other civil society organizations.

The second session of the Council was held on March 26, 2024, at which, among other things, it was emphasized that the priority topics of the Council in 2024 are the financing of civil society organizations from the budget of the Republic of Serbia and the safety of human rights defenders, and an initiative of a civil society organization was also presented, which contains a Proposal for Recommendations for Improving the Transparency of the Implementation of Public Competitions for Financing Programs of Public Interest Implemented by Associations, which was supported by a majority of votes.

In accordance with the Guidelines for the inclusion of civil society organizations in working groups for the development of proposals for public policy documents and Draft proposals for regulations, the Ministry of Human and Minority Rights and Social Dialogue published six public calls during the third and fourth quarters in cooperation with the following authorities:

In cooperation with the Ministry of the Interior, Public Calls were published for civil society organizations to propose candidates for membership in the Working Group for the Development of a Public Policy Document in the Field of Control of Small Arms and Light Weapons, Ammunition and Explosives in the Republic of Serbia for the Period 2025–2030, with an Action Plan for the Period 2025–2027, for which no applications were received, and a Public Call for Civil Society Organizations to propose candidates for membership in the Working Group for the Development of a Draft Law on Combating Human Trafficking in the Republic of Serbia, within which five organizations and their representatives were proposed for membership in the aforementioned working group. In cooperation with the Republic Secretariat for Public Policy, a Public Call was published for civil society organizations for membership in the Working Group for the Preparation of Amendments to the Legal Framework for Consultations and Public Debates, in which three organizations and their representatives were selected. In cooperation with the Ministry of Justice, a Public Call was published for civil society organizations for the nomination of candidates for participation in the Special Working Group for the Drafting of the Law on Amendments and Supplements to the Law on the Protection of Personal Data, in which two civil society organizations and their representatives were selected and nominated. Public calls are underway that were published in cooperation with the Ministry of Environmental Protection, a Public Call for Civil Society Organizations to nominate candidates for membership in the Working

Group for the Draft Law on Protection from Non-Ionizing Radiation, and a Public Call that the Ministry of Human and Minority Rights and Social Dialogue independently published a Public Call for Civil Society Organizations to join the Civil Society Platform for the Improvement of the Position of Roma.

Bearing in mind that the Ministry of Human and Minority Rights and Social Dialogue took steps towards greater involvement of citizens in the fight against corruption, the Agency assessed the activity as implemented.

Activity 2.2.11.2.

Further improve the system of transparent financing of civil society organizations, by: - Monitoring the implementation of the Decree on funds for stimulating programs or the missing part of funds for financing programs of public interest that are implemented by associations; - Strengthening the capacity of public administration employees.	
In charge of activity	• Office for Cooperation with Civil Society
Deadline	Continuous
Indicators of results	The summary report of the Office for Cooperation with Civil Society contains relevant data on the implementation of the Decree. The number of trainings held for public administration employees, in relation to the number of planned trainings on the system of transparent financing of civil society organizations.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.2.11.2.

The Ministry of Human and Minority Rights and Social Dialogue reported on joint activities in 2021 and 2022, and more detailed data can be found in previous reports. The Ministry of Human and Minority Rights and Social Dialogue informed the Agency that, in order to improve transparent financing and sustainability of the civil sector, in cooperation with the Commissioner for Information of Public Importance and Personal Data Protection, three trainings were conducted with the aim of increasing the capacity of public administration employees on the topic of "Preparation of annual reports in accordance with the Law on Free Access to Information of Public Importance". The trainings were intended for representatives of state administration bodies and local self-government, as well as representatives of civil society organizations. The trainings were attended by more than 450 participants.

In September 2024, the Ministry of Human and Minority Rights and Social Dialogue launched the publicly available application “Calendar of Public Competitions”, which aims to collect data from public administration bodies at all three levels of government on planned and implemented financial support to civil society organizations from the budget of the Republic of Serbia. The application, with a searchable database, is available on the website of the Ministry of Human and Minority Rights and Social Dialogue. During this reporting period, data for 379 public competitions of public administration bodies were entered into the application.

In order to develop criteria and guidelines for the allocation of non-financial support to civil society organizations by public administration bodies, a Draft Guidelines for the Allocation of Non-Financial Support from State Institutions to Civil Society Organizations was developed. The draft of the above guidelines was presented at a consultative meeting with civil society organizations with experience in the allocation of space to civil society organizations, and then improved, taking into account the suggestions made by civil society organizations. The finalization of the above document is planned in a joint consultative process with representatives of central government bodies and civil society organizations, which is planned for February 2025.

Considering that the Ministry of Human and Minority Rights and Social Dialogue provided information on the implementation of the Regulation on funds for stimulating programs or the missing part of funds for financing programs of public interest implemented by associations, as well as that it organized capacity-building activities related to transparent financing of civil society organizations, the Agency assessed the activity as implemented.

Activity 2.2.11.3.

Conduct public competitions for the allocation of funds to civil society organizations for projects in the field of anti-corruption, for initiatives at the national and local level, as well as for media initiatives in the field of anti-corruption.	
In charge of activity	• Agency for prevention of corruption
Deadline	Continuous
Indicators of results	The civil sector is involved in the fight against corruption, based on conducted competitions for donations to civil society organizations for projects in this area.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.2.11.3.

The Agency has reported that it has conducted two public competitions for the allocation of funds to civil society organizations for anti-corruption projects, for initiatives at the republican and local level, as well as for media initiatives in the fight against corruption, on which data are available in previous reports.

An Annual Plan for announcing public competitions for the allocation of funds to CSOs was developed, posted on the Agency's website and submitted to the Ministry of Human and Minority Rights and Social Dialogue; A public competition for the allocation of funds to civil society organizations was conducted, project proposals were analyzed and their evaluation was carried out in accordance with the criteria; The general goal of the competition is to raise the level of education of young people in the function of preventing corruption; A consultative meeting was organized with representatives of four associations that received financial resources based on the conducted public competition in order to inform them about the most important elements of the contract and their obligations to the Agency during the duration of the projects.

In the reporting period, the monthly narrative and quarterly financial reports of the organization “Transparency Serbia” were audited, which implemented the project “Support to local governments in the development of local anti-corruption policies and increasing transparency”. Monitoring visits were also conducted at the association's premises, and the conversation was conducted based on a structured interview, after which a report with recommendations and conclusions was prepared and sent to the association.

The Agency representative gave a lecture on the Agency's competencies and presented forms of cooperation with civil society at a seminar organized by BUM Bečej.

Training was held for employees in the Agency's regional units on the public competition for the allocation of funds to civil society organizations, where colleagues were introduced to the most important segments of the public competition that relate to project proposal applicants; potential ways of promoting the competition locally were discussed.

The representative of the Sector participated in the second meeting of the Special Working Group for the Drafting of the Action Plan for the Implementation of the Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the Period 2024–2025 as a member of the working group;

The representative of the Sector attended the annual conference “Public on Public Tenders” organized by BIRN and Civic Initiatives.

The Final Report on the Implementation of the Project “Corruption Risk Analysis in Local Government Regulations” of the Association “Transparency Serbia” was prepared, to which the Agency allocated funds (after the audit of the final narrative and final financial reports, supporting documentation, as well as the report of the authorized auditor); The Final Report was published on the Agency’s website.

New monthly narrative and final narrative report forms have been developed for civil society organizations that have been awarded grants; the forms have been posted on the Agency's website and sent by email to organizations that have been awarded funds in 2024 for the implementation of projects in the field of anti-corruption education for youth.

In the reporting period, monthly reports of ongoing youth anti-corruption education projects implemented by the Užice Center for Human Rights and Democracy, the Podrinje Anti-Corruption Team – PAKT, and the Bečej Youth Association, Magenta were reviewed.

An online consultation meeting was organized with the aforementioned civil society organizations implementing youth anti-corruption education projects in order to better monitor the implementation of project activities, provide support in developing training designs, and inform about the need to develop an evaluation questionnaire.

A monitoring visit was conducted to the Podrinje Anti-Corruption Team – PAKT association for the purpose of mandatory monitoring of the implementation of project activities, and a report with recommendations was prepared and sent to the association.

The representative of the Sector participated in the meeting of the Special Working Group on the Draft Action Plan for the period for the implementation of the “Strategy for Creating an Enabling Environment for the Development of Civil Society in the Republic of Serbia for the Period 2022–2030”.

Having in mind the above, in this reporting period the activity was assessed as implemented.

REPRESSION OF CORRUPTION

In this report, in the Section 2.3 of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, which refers to the repression of corruption, the Agency assessed the implementation of activities related to the following benchmark:

2.3.1. Serbia is revising its Criminal Code and providing an effective solution for dealing with crimes against the economy, especially the criminal act “abuse of office by responsible official”.

The activities in question are Activities no. 2.3.1.1, 2.3.1.2 and 2.3.1.3, which are individually presented below.

Activity 2.3.1.1.

Monitor the implementation of the amended and supplemented Criminal Code, the part referring to corruption-related and economic crimes, with the obligation of the police, public prosecutor's office and courts to submit to the Ministry of Justice annual statistical reports on initiated and completed proceedings.	
The Ministry of Justice compiles a single annual report and publishes it on its website.	
In charge of activity	• Ministry of Interior • Republic Public Prosecutor's Office • Supreme Court of Cassation • Ministry of Justice (State Secretary in charge of corruption issues)
Deadline	Continuous
Indicators of results	Annual report has been published.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.1.1.

In the previous reporting cycles, the Ministry of Justice submitted information on the implementation of activities, i.e. that the reports for 2020, 2021 and 2022 were prepared and published on the website of the Ministry of Justice: <https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-.php>.

The report on the implementation of the Criminal Code in relation to corruption and economic crimes for the period from 1 January to 31 December 2023 was prepared and published on the website of the Ministry of Justice: <https://www.mpravde.gov.rs/tekst/14518/izvestaji-o-primeni-zakona-o-zastiti-uzbunjivaca.php>.

The Ministry of Internal Affairs reported that the Internal Control Sector filed 32 criminal charges due to the existence of grounds for suspicion that some of the criminal offenses of corruption were committed, for criminal offenses from the Criminal Code.

From the area of jurisdiction of the Ministry of Internal Affairs for criminal offenses / Criminal Police Directorate, in the first half of 2024:

- from Article 359 of the Criminal Code – Abuse of official position, 30 criminal charges were filed for 50 criminal offenses;
- from Article 367 of the Criminal Code – Accepting bribes, 4 criminal charges were filed for 4 criminal offenses;
- from Article 368 of the Criminal Code – Giving bribes, 7 criminal charges were filed for 7 criminal offenses;
- from Article 366 of the Criminal Code – Trading in influence, no criminal charges were filed in this period.

The Supreme Public Prosecutor's Office reported that the Public Prosecutor's Office for Organized Crime and the Special Departments for Suppression of Corruption in Higher Public Prosecutor's Offices submitted reports to the Supreme Public Prosecutor's Office on initiated and completed procedures in connection with economic crime and corruption cases. Based on the aforementioned reports, the Supreme Public Prosecutor's Office monitors the actions of prosecutors' offices in this area.

The Agency assessed that this is a regular annual practice, supported by the reports produced and the fact that reports for the previous year are produced in the current year, which is why it assessed the activity as implemented.

Activity 2.3.1.2.

Training of judges and prosecutors for the application of the Criminal Code.	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Number of conducted trainings, in relation to the number of planned trainings.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.1.2.

The Judicial Academy reported that it had conducted: 1) Two two-day workshops on the topic: "Procedure Management Skills: Writing Indictment Bills", in Novi Sad and Niš, for a total of 54 participants; 2) Four two-day seminars on the topic: "Public Procurement – Abuses: Red Flag Methodology", in Niš, Kraljevo, Novi Sad and Belgrade, for a total of 77 participants; 3) In cooperation with the OSCE, it conducted two one-day seminars on the topic: "Application of Rules on Costs of Criminal Proceedings", in Niš and Kragujevac, for a total of 62 participants; 4) Organized five one-day

workshops on the topic: “Advanced Workshop on Digital Assets”, in Belgrade, Novi Sad, Niš and Kragujevac, for a total of 83 participants; 5) One five-day workshop in Belgrade, on the topic: “Financial Investigations”, for a total of 22 participants, as well as one four-day workshop on Kopaonik for a total of 14 participants; 6) One three-day training of trainers (ToT) on Kopaonik, on the topic: “Training of trainers on active financial investigation practices”, for a total of 14 participants; 7) In cooperation with USAID, conducted one one-day training in Belgrade, on the topic: “Public Procurement – Criminal Justice Aspect”, for a total of 37 participants; 8) One four-day workshop in Belgrade, in cooperation with GIZ, on the topic: “Financial Investigations”, for a total of 19 participants; 9) In cooperation with the OSCE Mission, held three one-day seminars in Belgrade, Niš and Novi Sad, on the topic: “Presentation of the Amended Manual on the Application of the Principle of Opportunity for Prosecution”, for a total of 201 participants; 10) One two-day workshop in Belgrade, on the topic: “Trends in High-Tech Crime: Electronic Evidence, Cryptocurrencies and Artificial Intelligence” for a total of 19 participants; 11) In cooperation with the OSCE Mission, conducted three two-day workshops in Belgrade, Niš and Vrdnik, on the topic: “Confiscation of criminal assets”, for a total of 73 participants; 12) In cooperation with USAID, conducted a two-day training in Vršac, on the topic: “Public Procurement - Training for Advanced Use of the Public Procurement Portal for the Police and Prosecutor's Office”, for a total of 12 participants; 13) Two two-day workshops on the topic: “Procedure Management Skills: Writing Indictment Acts”, in Vranje and Zlatibor, for a total of 44 participants; 14) In cooperation with the OSCE Mission, conducted two one-day workshops in Belgrade and Kragujevac, on the topic: “Inspection as an evidentiary act – Digital Forensics”, for a total of 61 participants; 15) In cooperation with USAID, conducted a two-day training in Sokobanja, on the topic: “Complex Offenses in the Field of Public Procurement”, for a total of 28 participants; 16) With the OSCE Mission, conducted a three-day training in Niš, on the topic: “Fighting Money Laundering”, for a total of 17 participants; 17) In cooperation with USAID, conducted two two-day trainings in Niš and Belgrade, on the topic: “Public Procurement – Effective Planning of Investigations in Public Procurement Cases”, for a total of 21 participants; 18) With the OSCE Mission, conducted two one-day trainings in Niš and Kragujevac, on the topic: “The Principle of Opportunity” for a total of 55 participants; 19) One one-day training in Niš on the topic: “The relationship between the verdict and the accusation” for a total of 20 participants; 20) In cooperation with the OSCE Mission, two one-day trainings were conducted on the topic: “Costs of criminal proceedings”, in Belgrade and Novi Sad, for a total of 88 participants; 21) In cooperation with the OSCE Mission, two one-day workshops were conducted in Niš and Kragujevac, on the topic: “Inspection as an evidentiary act – Forensics of expert examination in the service of evidence collection”, for a total of 37 participants; 22) In cooperation with the OSCE Mission, two one-day workshops were conducted in Belgrade and Novi Sad on the topic: “Inspection as an evidentiary act – Improved and new scientific methods in the field of criminal forensics”, for a total of 31 participants; 23) Conducted six two-day seminars on the topic: “Inspection in traffic accidents”, in Vranje, Pirot, Negotin, Zaječar, Leskovac and Prokuplje for a total of 155 participants.

The Agency assessed the activity as implemented.

Activity 2.3.1.3.

Monitor the application of the amended criminal offence “abuse of office by responsible official”, which includes the mechanism of “legal subsidiarity”, in effect since 1 March 2018, and monitor those criminal events from 1 March 2018.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor’s Office
Deadline	Continuous
Indicators of results	The annual report has been published.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.3.1.3.

In previous reporting cycles, the Ministry of Justice has submitted information on the implementation of activities, i.e. that the reports for 2020, 2021 and 2022 were prepared and published on the website of the Ministry of Justice: <https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-.php>.

The report for 2022 was prepared and published on the official website of the Ministry of Justice in June 2023:

<https://www.mpravde.gov.rs/tekst/33769/statistika-koruptivnih-krivicnih-dela-.php>

The report on the implementation of the Criminal Code in terms of corruption and economic crimes for the period from January 1 to December 31, 2023 was prepared and published on the website of the Ministry of Justice: <https://www.mpravde.gov.rs/tekst/14518/izvestaji-o-primeni-zakona-o-zastiti-uzbunjivaca.php>

The Supreme Public Prosecutor's Office reported in accordance with the Mandatory Instruction of the Supreme Public Prosecutor A No. 146/2018 of 1 March 2018, as amended by the General Mandatory Instruction O No. 5/2023 of 30 May 2023, the Public Prosecutor's Office for Organized Crime and the Special Departments for Combating Corruption in Higher Public Prosecutor's Offices shall submit quarterly reports to the Supreme Public Prosecutor's Office on initiated and completed proceedings in connection with economic crime and corruption cases. Based on the aforementioned reports, the Supreme Public Prosecutor's Office shall monitor the actions of the prosecutor's offices in this area.

The Agency has verified that this is a regular annual practice of the Ministry of Justice, which is supported by the reports prepared for 2020, 2021, 2022 and 2023 and the fact that reports for the previous year are prepared in the current year, which is why the Agency assessed the activity as implemented.

In this report, in the same Section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.3.2. Prior to amending the Law on the Organization and Competences of State Authorities in Combating Organised Crime, Corruption and Other Particularly Serious Crimes, Serbia has conducted an analysis of the organizational structure and state authorities. Serbia pays special attention to building the capacity of public prosecutor's offices and the police, and provides the necessary financial and staff support and training. Inter-agency cooperation and the exchange of intelligence in a safe and secure manner are significantly improved.

The activities in question are Activities no. 2.3.2.1, 2.3.2.2, 2.3.2.3, 2.3.2.4, 2.3.2.5, 2.3.2.6, 2.3.2.7, 2.3.2.10, 2.3.2.12. which are presented individually below.

Activity 2.3.2.1.

Conduct an analysis of compliance of the RS normative framework with the FATF recommendations for conducting financial investigations in parallel with criminal investigations, on the basis of which a planning document in the field of combating financial crime will be prepared. (Link to AP 24, Activity 6.2.5.4)	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime • Ministry of Interior • Anti-Money Laundering Authority
Deadline	For the analysis: fourth quarter of 2020 For the planning document: fourth quarter of 2021
Indicators of results	An analysis of the compliance of the normative framework with the relevant FATF recommendations has been made. A planning document in the field of fight against financial crime has been prepared.
Agency's assessment	The activity was implemented in the part relating to the preparation of the analysis.
	The activity was not implemented in the part relating to the preparation of the planning document.

On the implementation of Activity 2.3.2.1.

The Ministry of Justice reported that the Analysis of the Compliance of the Regulatory Framework with the FATF Recommendations for the Potential Development of a Strategic Document in the Field of Combating Financial Crime was completed and submitted to the Ministry of Justice at the end of June 2022. For this reason, there was a delay in the preparation of the aforementioned strategic document. The analysis is the basis for the work of the multi-sectoral Working Group tasked with the development of amendments to the Law on the Confiscation of Assets Derived from Criminal Offences, which was established by the Ministry of Justice of the Republic of Serbia on 29 May 2023. The members of the Working Group will act on the FATF recommendations to improve the efficiency of the procedure for the confiscation of assets derived from criminal offences, increase the proactivity of the investigation,

and improve the coordination of the competent authorities involved in this process, as well as the confiscation of cryptocurrency.

The working group has completed its work and the draft text of the Law has been submitted to the Minister of Justice. Tables of compliance of the text of the Law on Amendments and Supplements with relevant EU regulations and FATF recommendations have been prepared and in December 2024 the text was sent to the European Commission for review and possible comments.

In addition, one of the reasons for adopting the Law on Amendments to the Law on Public Notaries, which was adopted by the National Assembly on 27 November 2024, is the harmonization with FATF recommendations in the field of preventing money laundering. According to the Law on Preventing Money Laundering and Financing of Terrorism, the limit for cash transactions is 10,000 euros. A notary public must solemnize a loan agreement between individuals whose value exceeds 10,000 euros and immediately thereafter (after solemnization) submit such an agreement to the Anti-Money Laundering Office for recording.

Within the framework of the Flexible Facility project for Chapter 24, support will be provided for the development of an Operational Plan for Financial Investigations, which will be adopted by the end of the 2nd quarter of 2025. Namely, the Republic of Serbia has begun activities related to the development of an Operational Plan for Financial Investigations, within which an analysis of the implementation of the previous National Strategy for Financial Crime Investigations will be carried out. Namely, the formation of a Working Group for the development of the aforementioned Operational Plan is underway. In accordance with the Reform Agenda, the deadline for the adoption of this plan is the end of 2025.

With the support of the Flexible Facility for Chapter 23 project, in cooperation with the Supreme Public Prosecutor's Office, a Working Group was formed to develop a Standard Operating Procedure / Internal Instruction and accompanying Manual on Proactive Conduct of Financial Investigations, composed of representatives of the SPPO, PPOOC, SPPO-SACD, the Anti-Money Laundering Administration, the Tax Administration and the Ministry of the Interior (FIU, COCS).

The final meeting of the Working Group was held in Vršac in November 2024, after which the final text of the Manual for Proactive Investigations was agreed. The manual, which is expected to be published in early 2025, covers a number of areas: the relationship between financial investigations and financial research, operational and financial indicators, the development of a financial-asset profile, data sources, analysis and processing of collected data, the principle of following money trails, international cooperation in financial investigations and asset seizure, the application of interim measures of security and seizure of property and assets, procedures for opening, recording and closing a financial investigation, etc. The publication contains examples of documents and forms for conducting a financial investigation and methods for determining the value of assets of illegal origin with examples of calculations. Technical and expert support to the Working Group and accompanying activities is implemented in cooperation with the OSCE Mission.

In the period of September and November 2023 two additional meetings of the Working Group were held, where work was done on the elaboration of the structure of the SOP/manual, as well as on the preparation of material that will be available in electronic form. Two more meetings of the Working

Group were held in the first quarter of 2024 and a draft was sent for comments to experts from Slovenia and Germany. The final version was approved by the Working Group members in June 2024.

The activity is implemented in cooperation with the OSCE Mission.

The Agency assessed the activity as two activities, having in mind that it contains a sub-activity related to the analysis and a sub-activity related to the preparation of the planning document. The Agency assessed the activity, in the part of the analysis, as implemented, and in the part of the planning document as not implemented.

Activity 2.3.2.2.

Strengthen the capacity of the Financial Investigation Unit of the Ministry of the Interior, based on the results of the analysis. (Related activity from AP 24: Activity 6.2.5.3.)	
In charge of activity	• Ministry of Interior
Deadline	From the second quarter of 2016 on.
Indicators of results	The number of employees in the Financial Investigation Unit has been increased from 57 to 63 police officers. Trainings have been conducted. Percentage of trained personnel in the Financial Investigation Unit of the Ministry of the Interior, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.2.2.

The Ministry of Interior regularly reports on the number of systematized and filled jobs in the Financial Investigations Unit, as well as on the training and measures taken to strengthen the capacity of the Financial Investigations Unit. All data can be found in previous reports.

In 2023, the Ministry of Interior has reported that the number of systematized jobs in the Financial Investigations Unit increased from 2 to 66, while the number of filled job positions in 2023 was 58 (in 2022, it was 62).

Police officers of the Financial Investigations Unit participated in the following seminars in the first half of 2024: 1) In March 2024, a seminar was held in Sarajevo, Republic of Bosnia and Herzegovina, on the topic of “Financial Investigation Techniques” organized by OPDAT. The seminar was attended by four police officers of the Financial Investigations Unit; 2) In March 2024, a seminar was held in Vršac, on the topic of “Value Added Tax Fraud”, organized by the Organization for Security and Co-operation in Europe – OSCE and the Office for International Assistance, Training and Further Training in the Judiciary – OPDAT. The meeting was attended by one police officer of the Financial Investigations Unit; 3) On April 16, 2024, in Belgrade, Hotel “M”, a seminar was held on the topic: “Prevention of money laundering, FATF Recommendations and immediate results”, organized by GIZ, the Ministry of Foreign Affairs of the Kingdom of Norway and the Judicial Academy. The meeting was attended by two police officers of the Financial Investigation Unit; 4) In April 2024, on Kopaonik, a

training of instructors on active financial investigation practices was held, within the framework of the project to support Serbia in achieving the goals of Chapter 24 – Justice, Freedom and Security. The training was attended by eight police officers of the Financial Investigation Unit; 5) On April 29, 2024, in Belgrade, a meeting was held on the occasion of the launch of the project on the topic “Suppression of economic crime in Serbia”, organized by the Council of Europe. The meeting was attended by one police officer from the Financial Investigation Unit; 6) In June 2024, a training of instructors on active financial investigation practices was held on Kopaonik, Project to Support Serbia in Achieving the Goals of Chapter 24 – Justice, Freedom and Security. Eight police officers from the Financial Investigation Unit attended the training.

As the number of employees increased, and other measures aimed at strengthening the professional capacities of the Financial Investigation Unit were taken, the Agency assessed the activity as implemented.

Activity 2.3.2.3.

Conduct professional training of employees with information exchange mechanisms at the international level in accordance with Framework Decision 2006/960/PUP in order to more efficiently seize, confiscate and manage property.	
In charge of activity	• Judicial Academy • Ministry of Interior
Deadline	Continuous, starting from the fourth quarter of 2021
Indicators of results	Training has been conducted. Percentage of employees trained on information exchange mechanisms at the international level, in relation to those in need of training.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.3.2.3.

The Judicial Academy has also provided data on the training courses conducted in previous reporting cycles. The Judicial Academy reported that it: 1) In cooperation with the US Department of Justice (OPDAT) and the OSCE Mission, it conducted two three-day workshops in Vršac and Šabac, on the topic: “Fighting Money Laundering”, for a total of 47 participants; 2) It organized five one-day workshops on the topic: “Advanced Workshop on Digital Assets”, in Belgrade, Novi Sad, Niš and Kragujevac, for a total of 83 participants; 3) One five-day workshop in Belgrade, on the topic: “Financial Investigations”, for a total of 22 participants, as well as one four-day workshop on Kopaonik for a total of 14 participants; 4) One three-day training of trainers (ToT) on Kopaonik, on the topic: “Training of Trainers on Active Financial Investigation Practices”, for a total of 14 participants; 5) In cooperation with USAID, conducted a one-day training in Belgrade, on the topic: “Public Procurement – Criminal Justice Aspect”, for a total of 37 participants; 6) A four-day workshop in Belgrade, in cooperation with GIZ, on the topic: “Financial Investigations”, for a total of 19 participants; 7) A two-day workshop in Belgrade on the topic: “Trends in High-Tech Crime: Electronic Evidence, Cryptocurrencies and Artificial Intelligence” for a total of 19 participants; 8) In cooperation with the OSCE Mission, three two-day workshops were held in Belgrade, Niš and Vrdnik on the topic: “Confiscation of Criminal

Proceeds”, for a total of 73 participants; 9) Two two-day workshops on the topic: “Procedure Management Skills: Writing Indictment Documents”, in Vranje and Zlatibor, for a total of 44 participants; 10) In cooperation with the OSCE Mission, two one-day workshops were held in Belgrade and Kragujevac on the topic: “Inspection as an Evidential Action - Digital Forensics”, for a total of 61 participants; 11) Conducted a three-day training in Niš with the OSCE Mission on the topic: “Fighting Money Laundering”, for a total of 17 participants; 12) Conducted two one-day workshops in Niš and Kragujevac in cooperation with the OSCE Mission on the topic: “Inspection as an evidentiary act – Forensic expertise in the service of evidence collection”, for a total of 37 participants; 13) In cooperation with the OSCE Mission, two one-day workshops were held in Belgrade and Novi Sad on the topic: “Scene-finding as an evidentiary act – Improved and new scientific methods in the field of criminal forensics”, for a total of 31 participants; 14) The Judicial Academy organized a round table on the topic: “Annual Forum of Judges and Public Prosecutors Fighting Serious and Organized Crime” in Belgrade, for a total of 31 participants.

The Ministry of Internal Affairs reported that police officers of the Financial Investigation Unit attended the following seminars in the first half of 2024: 1) A meeting on the topic of “Financial Investigations and Asset Confiscation” was held in Vienna in January 2024, organized by the United Nations Office on Drugs and Crime – UNDOC. The meeting was attended by two police officers of the Financial Investigation Unit; 2) In February 2024, a meeting was held in Belgrade with the European Union Expert Mission on the topic of “Development of a Gap Analysis in the System for Processing Money Laundering and Temporary and Permanent Asset Confiscation”, organized by the Council of Europe and the Swedish International Development Agency. The meeting was attended by two police officers of the Financial Investigation Unit; 3) On March 1, 2024, a meeting was held in Belgrade with the EU Expert Mission on the topic: “Development of a Gap Analysis in the System for Processing Money Laundering and Temporary and Permanent Seizure of Assets” organized by the Council of Europe and the Swedish International Development Agency. The meeting was attended by one police officer from the Financial Investigation Unit; 4) On March 26, 2024, a “Presentation of the Report on the Gap Analysis in the System for Detecting and Investigating Money Laundering Crimes, Proactive Use of Financial Intelligence and Seizure of Criminal Assets” was held in Belgrade. The project is supported by the Swedish International Development Cooperation Agency and implemented by the Council of Europe. The meeting was attended by one police officer from the Financial Investigation Unit; 5) In May 2024, a “Specialized Workshop on Asset Forfeiture in Accordance with the United Nations Convention against Corruption” was held in Rome, at the invitation of the United Nations Office on Drugs and Crime. The meeting was attended by two police officers from the Financial Investigation Unit.

Therefore, the Agency assessed the activity as implemented.

Activity 2.3.2.4.

Continuous training of police, public prosecutors and judges to conduct financial investigations, monitor cash flows, act proactively and use special investigative techniques. (Activity related to AP 24: Activity 6.2.5.2)	
In charge of activity	• Judicial Academy
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of police officers, public prosecutors and judges trained to conduct financial investigations, monitor cash flows, act proactively and use special investigative techniques, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.2.4.

The Judicial Academy has reported on the conducted training of police officers, public prosecutors and judges for conducting financial investigations, monitoring money flows, special investigative techniques and proactive actions. All relevant data can be found in previous reports.

1) The Judicial Academy has reported that it had organized: One five-day workshop in Belgrade, on the topic: "Financial Investigations", for a total of 22 participants, as well as one four-day workshop on Kopaonik for a total of 14 participants; 2) Three-day Training of Trainers (ToT) on Kopaonik, on the topic: "Training of Trainers on Active Financial Investigation Practices", for a total of 14 participants; 3) In cooperation with the German Organization for International Cooperation (GIZ), organized a one-day seminar on the topic: "Prevention of Money Laundering, FATF Recommendations and Immediate Results" in Belgrade, for a total of 26 participants; 4) In cooperation with the US Department of Justice (OPDAT) and the OSCE Mission, conducted two three-day workshops in Vršac and Šabac, on the topic: "Fighting Money Laundering", for a total of 47 participants; 5) In cooperation with USAID, conducted a one-day training in Belgrade on the topic: "Public Procurement – Criminal Law Aspects", for a total of 37 participants; 6) In cooperation with the OSCE Mission, held three one-day seminars in Belgrade, Niš and Novi Sad on the topic: "Presentation of the Amended Manual for the Application of the Principle of Opportunity in Criminal Prosecution", for a total of 201 participants; 7) The Judicial Academy conducted a four-day workshop in Belgrade, in cooperation with GIZ, on the topic: "Financial Investigations", for a total of 19 participants; 8) One two-day workshop in Belgrade on the topic: "Trends in High-Tech Crime: Electronic Evidence, Cryptocurrencies and Artificial Intelligence" for a total of 19 participants; 9) In cooperation with the OSCE Mission, conducted three two-day workshops in Belgrade, Niš and Vrdnik, on the topic: "Confiscation of Criminal Assets", for a total of 73 participants; 10) In cooperation with USAID, conducted one two-day training in Vršac, on the topic: "Public Procurement – Training for Advanced Use of the Public Procurement Portal for the Police and Prosecutor's Office", for a total of 12 participants; 11) Two two-day workshops on the topic: "Procedure Management Skills: Writing Indictment Documents", in Vranje and Zlatibor, for a total of 44 participants; 12) In cooperation with the OSCE Mission, two one-day workshops were conducted in Belgrade and Kragujevac on the topic: "Inspection as an Evidence Tool – Digital Forensics", for a total of 61 participants; 13) In cooperation with the OSCE Mission, one three-day training was conducted in Niš on the topic: "Fighting Money Laundering", for a total of 17 participants; 14) In cooperation with

the OSCE Mission, two one-day trainings were conducted in Belgrade and Novi Sad on the topic: “Costs of Criminal Proceedings”, for a total of 88 participants; 15) In cooperation with the OSCE Mission, two one-day workshops were held in Niš and Kragujevac, on the topic: “Crime scene as an evidentiary act – Forensic expertise in the service of evidence collection”, for a total of 37 participants; 16) In cooperation with the OSCE Mission, two one-day workshops were held in Belgrade and Novi Sad, on the topic: “Crime scene as an evidentiary act – Improved and new scientific methods in the field of criminal forensics”, for a total of 31 participants; 17) Round table on the topic: “Annual Forum of Judges and Public Prosecutors Fighting Serious and Organized Crime” in Belgrade, for a total of 31 participants.

Given the above mentioned, the Agency assessed the activity as implemented.

Activity 2.3.2.5.

Enable mutual connection of criminal investigations databases, i.e. a secure system for electronic exchange of information between public prosecutor’s offices, the police, the Customs Administration, the Tax Administration, the Agency for the Anti-Corruption Agency and other relevant authorities that have databases of importance for combating corruption.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Ministry of the Interior • State Prosecutorial Council • Republic Public Prosecutor’s Office • Agency for the Prevention of Corruption
Deadline	First quarter of 2022
Indicators of results	Databases were connected.
Agency’s assessment	The activity was not implemented.

On the implementation of Activity 2.3.2.5.

The Republic Public Prosecutor’s Office has reported that the implementation of the activities is under way. With the aim of implementing the activities from the Revised Action Plan for Chapter 24, the project “Instrument to support Serbia in achieving goals within Chapter 24 – Justice, Freedom and Security (Facility IPA 2019)” is under way, implemented for the needs of the police and the judiciary. As part of the support for the Ministry of Interior of the Republic of Serbia, this project serves to plan, among other things, activities for the further development of the Police-Intelligence Model (PIM) in establishing the NCIS.

By establishing NCIS and digitizing the process, the Republic of Serbia will establish a unique, standardized, high-quality, and modern system of collection, processing, search, analysis, exchange, and management of data and information in the field of organized crime, corruption, terrorism, and other security-threatening phenomena.

One of the main goals of the project is the improvement or digitalization of business processes, especially between the prosecutor's office and the police, and one of the activities is planned to analyze business processes for their improvement.

In May 2024, a three-day workshop was held in Belgrade with the aim of developing business processes in the pre-trial detention procedure, i.e. a document that will serve to develop the technical specification of the case management system. In the second half of the year, workshops on the same topic continued. Several workshops were also held to develop the Security Act.

Since the measures have been taken (some after the deadline, though), and the activity has not yet been completed, the Agency assessed it as not implemented.

Activity 2.3.2.6.

Adopt the by-law from Article 16, paragraph 4 of the Law on Organization and Competences of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption, which will regulate deadlines, manner and ways of official communication between the police and the public prosecutor's office in cases of organised crime and corruption. (Activity related to the AP 24: Activity 6.2.2.1)	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Ministry of Interior, Service for the Fight against Organised Crime • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime
Deadline	Fourth quarter of 2021
Indicators of results	The by-law has been adopted.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.3.2.6.

The Ministry of Justice has reported that representatives of the Ministry of Justice and the Republic Public Prosecutor's Office were working on finalising the by-law and its adoption is expected in the near future. The adoption of the bylaw is expected after the adoption of amendments to the Law on the organization and competence of state bodies in suppression of organized crime, terrorism and corruption.

The deadline for the adoption of this act has expired, therefore the activity has not been completed, and bearing in mind the deadline for implementation, the Agency assessed the activity as not implemented.

Activity 2.3.2.7.

Strengthen the capacity of the Prosecutor's Office for Organised Crime and special departments of high public prosecutor's offices for combating corruption, by conducting trainings on the application of new mechanisms prescribed by the Law on Organization and Competences of State Authorities for Combating Organised Crime, Terrorism and Corruption (liaison officers, task forces, financial forensics service). (Activity related to the AP 24: Activity 6.2.2.3.)	
In charge of activity	• Judicial Academy • Prosecutor's Office for Organised Crime • Special department high public prosecutor's offices for combating corruption
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained employees, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.2.7.

In previous reporting cycles, the Judicial Academy and the Prosecutor's Office for Organized Crime submitted data on regular training of employees in the Prosecutor's Office for Organised Crime and the special anti-corruption departments in higher public prosecutor's offices on the implementation of new mechanisms prescribed by the Law on Organization and Competences of State Authorities in the Suppression of Organised Crime, Terrorism and Corruption (liaison officers, task forces, financial forensics service).

The Judicial Academy reported that in 2024, it organized following trainings: 1) In cooperation with the US Department of Justice (OPDAT) and the OSCE Mission, it conducted two three-day workshops in Vršac and Šabac, on the topic: "Fighting Money Laundering", for a total of 47 participants; 2) Within the framework of the Project to Support Serbia in Achieving the Objectives of Chapter 24: Justice, Freedom and Security" funded by the European Commission, it organized a two-day workshop on the topic: "Fraud and Irregularities in Handling European Union Funds (Phase 2)" in Belgrade, for a total of 13 participants; 3) A three-day workshop in Vršac on the topic: "Value Added Tax Fraud", for a total of 26 participants; 4) Two two-day workshops on the topic: "Procedure Management Skills: Writing Indictment Documents", in Novi Sad and Niš, for a total of 54 participants; 5) Five one-day workshops on the topic: "Advanced Workshop on Digital Assets", in Belgrade, Novi Sad, Niš and Kragujevac, for a total of 83 participants; 6) One five-day workshop in Belgrade on the topic: "Financial Investigations", for a total of 22 participants, as well as one four-day workshop on Kopaonik for a total of 14 participants; 7) Three-day Training of Trainers (ToT) on Kopaonik on the topic: "Training of Trainers on Active Financial Investigation Practices", for a total of 14 participants; 8) Together with the German Organization for International Cooperation (GIZ), organized one one-day seminar on the topic: "Prevention of Money Laundering, FATF Recommendations and Immediate Results" in Belgrade, for a total of 26 participants; 9) In cooperation with the OSCE Mission, conducted three two-day workshops in Belgrade, Niš and Vrdnik on the topic: "Confiscation of Criminal Assets", for a total of 73 participants; 10) In cooperation with

USAID, conducted a two-day training in Vršac on the topic: “Public Procurement – Training for Advanced Use of the Public Procurement Portal for the Police and Prosecutor’s Office”, for a total of 12 participants; 12) Two two-day workshops on the topic: “Procedure Management Skills: Writing Indictment Acts”, in Vranje and Zlatibor, for a total of 44 participants; 13) In cooperation with the OSCE Mission, conducted two one-day workshops in Belgrade and Kragujevac on the topic: “Inspection as an Evidential Action – Digital Forensics”, for a total of 61 participants; 14) One two-day workshop in Belgrade on the topic: “Trends in High-Tech Crime: Electronic Evidence, Cryptocurrencies and Artificial Intelligence” for a total of 19 participants; 15) In cooperation with the OSCE Mission, it conducted one three-day training in Niš, on the topic: “Fighting Money Laundering”, for a total of 17 participants; 16) In cooperation with the OSCE Mission, it conducted two one-day trainings on the topic: “Costs of Criminal Proceedings”, in Belgrade and Novi Sad, for a total of 88 participants; 17) One round table on the topic: “Annual Forum of Judges and Public Prosecutors Fighting Serious and Organized Crime” in Belgrade, for a total of 31 participants.

Representatives of the Public Prosecutor's Office for Organized Crime (PPOOC) participated in a number of educational activities: 1) Closed FATF webinar on parallel financial investigations; 2) Training program in the field of financial investigations; 3) Workshop “Fighting money laundering”; 4) Expert visits – preparation for the 6th round of evaluation / Pre-evaluation of the Council of Europe Committee MONEYVAL; 5) Advanced training on the topic of fighting money laundering (VAT fraud); 6) Workshop on improving public prosecutorial practice; 7) Online workshop on financial forensics and work on money laundering cases; 8) Advanced training on conducting digital investigations in human trafficking and migrant smuggling; 9) Seminar: “New technological trends in the fight against digital and crypto fraud”; 10) Workshops “Current state and challenges in the domain of action and access to communications: technical and judicial approach to cases in which Encrochat, Sky, Anom and Exclu were used”; 11) International Conference of Law Enforcement Agencies in the field of combating illegal migration; 12) Public Policy Analysis Certification Course; 13) HELP Online Course on International Legal Assistance; 14) Workshop for the presentation of FATF recommendations and immediate outcomes; 15) Study visit to Italy – courts and prosecutors’ offices dealing with the fight against mafia and corruption, with an emphasis on the area of public procurement; 16) FATF Webinar on Standards of Evidence and Best Practices in the Criminal Prosecution of Money Laundering; 17) Presentation of the Typology of Money Laundering and Trends and Modalities of Terrorist Financing in the Republic of Serbia; 18) ACAMS “Law Enforcement Seminar”; 18) Webinar of the International Association of Prosecutors “GLOBE” – network – strengthening international cooperation in the investigation and prosecution of transnational corruption crimes; 19) Regional Event “Understanding the role of women in organized crime”; 20) Advanced Training on “Investigation and Confiscation of Cryptocurrencies”; 21) Regional Roundtable on the Integration of Remote Translation into National Legislation and Operational Procedures in the Western Balkans; 22) Research Skills Using Publicly Available Information on Search Engines (OSINT); 23) Harvard Business School Online Course – Strategy Execution for Public Leadership; 24) International Conference “Presenting Complementary Mechanisms for the Confiscation of Illegally Acquired Assets”; 25) Workshop on the Development of a National Money Laundering and Financing of Terrorism Risk Assessment; 26) Regional Workshop on Parallel Financial Investigations and Financial Crime Enabled by a High-Tech Environment; 27) Presentation of Eurojust and the CRIMJUST Project for Chief Public Prosecutors; 28) Case Studies on Terrorism Prosecutions – Webinar Series; 29) Presentation and training on the use of the publication “Comprehensive Guidelines for the Comparative Analysis of Evidence Necessary for Successful Prosecution in Organized Crime, Money Laundering and Asset Recovery Cases with Special

Reference to the Importance of Circumstantial Evidence”; 30) Lecturers at the Regional Training – Advanced Workshop on Asset Confiscation; 31) Training on EU Best Practices in Proactive Criminal Investigations; 32) First Professional Conference of the High Prosecutorial Council; 33) Study Visit to the National Anti-Corruption Directorate of Romania; 34) Annual Forum for Judges and Prosecutors Dealing with Serious and Organized Crime; 35) Lecturer on the topic of “Writing indictments”; 36) Lecturers at the training on the topic of “Money Laundering”; 37) Plenary Meeting of the Standing Conference of Prosecutors for Organized Crime.

The trainings that the financial forensic expert PPOOC has undergone are presented under activity 2.3.2.10.

Since the capacities of the Prosecutor’s Office for Organised Crime and special departments for the suppression of corruption of high public prosecutor’s offices were indeed strengthened through the above trainings, the Agency assessed the activity as implemented.

Activity 2.3.2.10.

Strengthen the capacity of the Financial Forensics Service in the Prosecutor’s Office for Organised Crime and other authorities. (Activity related to AP 24: Activity 6.2.2.6)	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor’s Office • Prosecutor’s Office for Organised Crime
Deadline	Continuous, starting from the fourth quarter of 2020
Indicators of results	A team of economic forensic experts has been formed in the Prosecutor’s Office for Organized Crime. Trainings of economic experts have been conducted. Number of conducted trainings, in relation to the number of planned trainings.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.3.2.10.

The Ministry of Justice, the Republic Public Prosecutor's Office and the Public Prosecutor's Office for Organized Crime submitted data on the implementation of measures to strengthen the capacity of the Financial Forensics Service in the Public Prosecutor's Office for Organized Crime and special departments for combating corruption.

In 2024, the Ministry of Justice informed us that the Financial Forensics Service has been operating in the Public Prosecutor's Office for Organized Crime since May 1, 2022, when the second vacant position was filled, with two financial forensic experts.

In the reporting period the financial forensic experts participated, either as lecturers or participants, in the following educational activities: 1) Seminar “Fighting Money Laundering”; 2) Expert visits – preparations for the sixth round of evaluation / Pre-evaluation of MONEYVAL; 3) Online workshop on financial forensics and work on money laundering cases; 4) Training on financial forensics and work on money laundering cases; 5) Closed webinar on standards of evidence and best practices in money laundering cases; 6) Advanced training on combating money laundering (VAT fraud); 7) Workshop for the presentation of the Manual for the application of the risk assessment methodology in public procurement procedures for prosecutors and the police; 8) Webinar Crypto national security threats in 2023; 9) Webinar Compliance, market integrity, and consumer protection in crypto; 10) Webinar The crypto dimension of CSAM and human trafficking cases; 11) Study program International visitors leadership program on Combating government corruption; 12) Online courses on combating money laundering and terrorist financing; 13) Workshop on presenting FATF recommendations and immediate outcomes; 14) Conference on forensic accounting; 15) Perspectives on the development of forensic accounting capacities – challenges for the public and corporate sectors; 16) Study visit to the Anti-Corruption Office of the Canton of Sarajevo; 17) Study visit to Italy – courts and prosecutors' offices dealing with the fight against mafia and corruption, with an emphasis on the area of public procurement; 18) ACAMS Law Enforcement Seminar; 19) Research skills using publicly available information on search engines (OSINT); 20) Workshops on the development of a National Risk Assessment of Money Laundering and Terrorist Financing; 21) Online seminar “Understanding Bitcoins and Cryptocurrency Technologies”; 22) XVIII Regional Conference of the Payment Card Forum; 23) Meeting of the South East Europe Working Group on Cryptocurrency Monitoring; 24) Harvard Business School Online Course – Financial Accounting; 25) Study visit to the National Anti-Corruption Directorate of Romania; 27) Lecturers at the “Money Laundering” Training.

The Republic Public Prosecutor's Office reported that, in accordance with the Rulebook on the Internal Organization and Systematization of Job Positions, two financial forensic experts are permanently employed in the Prosecutor's Office for Organized Crime, thus filling both systematized job positions.

In the Special Departments for Combating Corruption in the Higher Public Prosecutor's Offices in Belgrade, Niš, Kraljevo and Novi Sad, systematic positions for financial forensic experts are vacant.

In the special department of the High Public Prosecutor's Office in Belgrade, two financial forensic experts were hired under a work contract. In the special department in Novi Sad, based on the agreement on the temporary transfer financial forensic experts were engaged until June 30, 2025.

As previously mentioned, the Republic Public Prosecutor's Office, in collaboration with the Faculty of Economics at the University of Belgrade, the US Ministry of Justice, and the Ministry of Foreign Affairs, is involved in the project “Building forensic-accounting capacities in Serbia”. This project aims to launch a one-year academic study program at the Faculty of Economics in Belgrade. This program will train staff, specifically financial forensic experts, to work in competent public prosecutor's offices.

The mentioned program is accredited. The first generation of students has completed the aforementioned

studies and the second generation has been enrolled in the 2024/25 school year.

Having in mind the above, Agency assessed the activity as implemented.

Activity 2.3.2.12.

Fill the vacancies in line with the Rulebook on Internal Organization and Classification of Job Positions in Prosecutor's Office for Organised Crime and special anti-corruption departments of high public prosecutor's offices. (Activity related to the AP 24: Activity 6.2.2.8)	
In charge of activity	• Prosecutor's Office for Organised Crime • State Prosecutors Council • Republic Public Prosecutor's Office • Ministry of Justice (State Secretary in charge of corruption issues)
Deadline	Fourth quarter of 2021
Indicators of results	Administrative capacities of Prosecutor's Office for Organised Crime and special anti-corruption departments have been filled in accordance with the new Rulebook on the Systemisation of Job Positions.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.3.2.12.

The Prosecutor's Office for Organised Crime has reported that in 2024 there was no an increase in the staffing capacity in said Prosecutor's Office. On the contrary, there was a reduction in the number of employees due to the termination of employment by operation of law of three public prosecutors and one employee in administrative and technical matters, so that at the moment there are six public prosecutorial positions available, i.e. 15 administrative staff positions.

The current accommodation capacities of the Prosecutor's Office for Organised Crime are not sufficient to accommodate all the planned job positions. This will be fully possible only after the new building that will house the Prosecutor's Office for Organized Crime is constructed in accordance with the activity 6.2.2.14 of the Action Plan for Chapter 24.

The Republic Public Prosecutor's Office has reported that the activities to fill the job positions have continued. In the Special Department for the Suppression of Corruption in Novi Sad, a new Rulebook on Internal Organization and Systematization of Job Positions entered into force on September 27, 2024, and therefore, the filling of job positions in accordance with this Rulebook is underway.

In the other Special Departments for Combating Corruption of the Higher Public Prosecutor's Offices, all systematized positions have been filled in accordance with the applicable Rules on Internal Organization and Systematization of Positions, except for the positions of financial forensic officers.

Activity 2.3.2.12 is not adequately termed, bearing in mind that, in essence, it requires a process longer than a one-off deadline. Rulebooks from activity 2.3.2.11 made it possible to strengthen the staffing capacities, which was done in 2022 and 2023, both in the Prosecutor's Office for Organised Crime and in the special anti-corruption departments of the higher public prosecutor's offices.

However, since the need to fill job positions in the above institutions still exists, the Agency assessed the activity as not implemented.

Within the same section of the Revised Action Plan for Chapter 23 – Subchapter “Fight against Corruption”, in this report, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.3. Conduct effective investigations of all allegations of corruption in privatization cases and ensure full transparency and accountability in order to avoid similar cases in the future.

These are activities no. 2.3.3.1. and 2.3.3.2, which are individually presented below.

Activity 2.3.3.1.

Create and implement the Program of mutual professional development of authorities participating in the privatisation process and authorities in charge of prevention and criminal prosecution of corruption cases.	
In charge of activity	• Judicial Academy (Director) • Ministry in charge of economic affairs • Anti-Corruption Agency
Deadline	Fourth quarter of 2021
Indicators of results	Trainings have been conducted. Number of conducted trainings, in relation to the planned trainings on mutual professional development of authorities participating in the privatisation process and authorities in charge of prevention and criminal prosecution of corruption cases.
Agency's assessment	The activity was implemented in the part referring to the creation of the Program for professional development.
	The activity was not implemented in the part referring to the realisation of the trainings.

On the implementation of Activity 2.3.3.1.

The Judicial Academy informed the Agency that a curriculum and case study with working material have been developed, and that no training was conducted in the first and second quarters of 2024. Their implementation is planned for the upcoming period.

Since no training was conducted in 2024, the Agency assessed the activity in the area of training as not conducted.

The activity was rated as two because it includes two wholes, namely the creation of curricula and the implementation of trainings. The activity in the part of creating the Professional Development Program was assessed as implemented, but not implemented in the part of training implementation.

Activity 2.3.3.2.

Hold regular meetings of the Anti-Corruption Council with the Republic Public Prosecutor's Office and the Prosecutor's Office for Organised Crime in order to better implement the recommendations provided in the Council's reports.	
In charge of activity	• Anti-Corruption Council • Republic Public Prosecutor's Office • Prosecutor's Office for Organised Crime
Deadline	Continuous
Indicators of results	Meetings are being held on a regular basis.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.3.2.

The Anti-Corruption Council reported that in 2024 it received from the Prosecutor's Office an annual report on the progress of cases for 2023. The Anti-Corruption Council did not hold a meeting with the Supreme Public Prosecutor's Office in the third and fourth quarters of 2024.

The Supreme Public Prosecutor's Office also reported that no meetings were organized between representatives of the Anti-Corruption Council, the Supreme Public Prosecutor's Office, and the Public Prosecutor's Office for Organized Crime during the reporting period.

Having in mind that the activities were implemented in certain periods, and that the deadline for implementation is continuous, the Agency assessed the activity as implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.4. Improve the collection of uniform statistics on corruption, drawing clear distinctions between different criminal offences and providing the possibility of a detailed assessment of the length of cases, outcomes, and so on.

The activity in question is the Activity no. 2.3.4.3. presented below.

Activity 2.3.4.3.

Establish a unique record (electronic register) of criminal acts with a corrupt element, in accordance with the law governing personal data protection, which will be used in the future to create criminal policy.	
In charge of activity	• Ministry of Justice (state secretary in charge of corruption issues) Republic Public Prosecutor's Office • Partner institutions: - Ministry of Interior - Ministry of Finance - Authorities in charge for the repression of corruption - All relevant institutions
Deadline	Second quarter of 2022
Indicators of results	The record was established.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.3.4.3.

The Ministry of Justice has reported that an electronic registry of criminal offences containing a corrupt element has been established, and that data is collected in accordance with the provisions of the Law on Personal Data Protection. The total number of cases in the ERCC in 2024 was 10.609.

The Republic Public Prosecutor's Office also reported in the previous reporting cycle that within the framework of the USAID Government Accountability project, in cooperation with the Ministry of Justice of the Republic of Serbia, the Republic Public Prosecutor's Office and the Supreme Court of Cassation, a project was implemented to develop the Electronic Register of Corruption Cases (ERCC).

ERCC is a reporting software tool that will provide regular and ad hoc reports with timely information on the status of corruption cases, reveal “bottlenecks” in the investigation of this type of cases, and enable the identification of strategies to increase the efficiency of the four special anti-corruption departments in higher courts and higher public prosecutor’s offices. The register will communicate with existing case management systems in courts and public prosecutor’s offices (AVP, SAPO) by generating reports based on data stored in these systems. Using the application will not require the introduction of new or changes to existing work processes in registry offices.

For the purpose of developing the application, the Republic Public Prosecutor's Office created models of necessary reports, the correctness of most reports was tested and confirmed, while a few reports could not be tested due to work on improving the SAPO program for managing cases in public prosecutor's offices.

The development of the new SAPO application is in the final phase, and in the second half of 2022, the work on the additional functionalities of the program necessary for the operation of the Electronic Register of Corruption Cases was completed, which enabled the testing of additional reports, such as the report on the duration of the procedure and the report on the costs of criminal proceedings.

As the last extension of the duration of the project expired on July 1, 2023, and the contractor has not yet completed the work on the necessary improvement of the developed and creation of the missing functionalities, it was not possible to declare the date of the start of the application of this software tool intended for the special departments for the suppression of corruption in higher public prosecutor's offices.

In the second half of 2024, the functionality was refined by the contractor and the majority of the application was tested by users.

Since it was not possible to state the date of the start of the implementation of this software tool intended for the Special Departments for the Suppression of Corruption in Higher Public Prosecutor's Offices, and taking into account the implementation deadline, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following recommendation from the Screening Report:

2.3.5. Ensure that the legislative and institutional frameworks allow for the effective temporary and permanent confiscation and management of criminal assets stemming from crime, which would lead to more asset confiscation cases, as well as the following benchmark:

Serbia is establishing an initial record of efficient and effective investigations (including financial investigations), prosecutions, convictions and confiscations of assets in corruption cases, including cases of high-level corruption. (Serbia is applying a zero-tolerance policy for information leakage in connection with planned or ongoing corruption investigations and imposes sanctions in the event of such situations – discussed in 2.3.7)

The activities in question are Activities no. 2.3.5.1, 2.3.5.2. and 2.3.5.3, which are presented below.

Activity 2.3.5.1.

Improve the capacity of the Directorate for the Management of Confiscated Property by holding trainings, especially in the part related to the management of property confiscated from legal persons.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) Directorate for the Management of Confiscated Property
Deadline	Continuous
Indicators of results	Trainings have been conducted. Percentage of trained employees in the Directorate for the Management of Confiscated Property, in relation to those in need of training.
Agency's assessment	The activity was implemented.

On the implementation of Activity 2.3.5.1.

The Ministry of Justice reported that in 2024, employees of the Directorate for the Management of Seized Assets, as part of the continuous training of judges and prosecutors, attended training courses in commercial and criminal law organized by the Judicial Academy, in accordance with the Memorandum of Cooperation between the Directorate and the Judicial Academy on continuous training of employees of the Directorate, which was signed. They attended training courses on the following topics: 1) "Digital Forensics", 2) "Fighting Money Laundering"; 3) "Prevention of Money Laundering, FATF Recommendations and Concrete Results"; 4) "Fundamentals of High-Tech Crime and Digital Evidence and Cryptocurrencies", 5) Organized by the US Embassy, OPDAT employees of the Directorate attended training courses on the topic of "VAT Fraud"; 6) Also, in the organization of GIZ, employees of the Directorate participated in the training "Money Laundering and FATF Recommendations"; 7) In the organization of the US Embassy, OPDAT employees of the Directorate attended the training on the topic "Confiscation of Assets Derived from a Criminal Act"; 8) Three-day seminar "Justice for All".

Given that steps were taken to strengthen the capacity of representatives of the Directorate for the management of confiscated property, the Agency assessed the activity as implemented.

Activity 2.3.5.2.

Improve international cooperation by concluding agreements with directorates from countries in the region and the EU. (Activity related to the AP 24: Activity 6.2.6.6)	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) Directorate for the Management of Confiscated Property
Deadline	Continuous
Indicators of results	Number of contracts concluded with directorates from the countries of the region and the EU.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.3.5.2.

The Ministry of Justice has reported in the previous cycle that a Draft Agreement on the division of property with foreign countries has been prepared and will be submitted as a proposal for the basis for negotiations with interested parties. Since positive answers were received from the counterparties, the Government of the Republic of Serbia adopted the Draft Agreement and the basis for conducting negotiations for the purpose of concluding a contract on the division of property with the Kingdom of Spain, Montenegro, Bosnia and Herzegovina and the Republic of Srpska. In addition, it was reported that in cooperation with the Project in cooperation with the “Asset Recovery Project Western Balkans Rule of Law Program”, AIRE Center, a Draft Agreement on the division of property was prepared to be signed by the mentioned countries and that two online meetings were held in which considered provisions of the submitted Draft Agreement. In 2022, the Kingdom of Spain and the Republic of Serbia worked on the harmonization of the proposed texts

Now the Ministry of Justice reported that the Conference in Belgrade was held on February 7, 2023, where most of the contract proposals were agreed upon. The meeting that was supposed to be held at the beginning of June 2023, in Montenegro, in order to harmonize the complete text of the contract, but it was postponed at the suggestion of the Montenegrin side – due to the elections in Montenegro.

The meeting of the representatives of the Republic of Serbia, Bosnia and Herzegovina and the Republic of Srpska was held on September 29, 2023. The text of the agreement was fully agreed at the meeting. The text was also sent to the Montenegrin side for a statement on the text of the contract itself and whether Montenegro remains committed to being a signatory party to the said contract. Since the Government of Montenegro has been formed in the meantime. The text was also sent to the Montenegrin side for comment, which only in November 2024 declared that it would continue the process with the aim of accepting the negotiated text of the agreement.

The Kingdom of Spain has submitted a response to the Draft Agreement and the proposed texts of both parties are currently being harmonized.

Although steps were taken to implement the activity, the Agency assessed the activity as not implemented from the standpoint of the result indicator which foresees a number of agreements concluded with directorates from the countries of the region and the EU.

Activity 2.3.5.3.

Strengthen the capacity of the Directorate for the Management of Confiscated Property by hiring new people in accordance with the Rulebook on job positions.	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) Directorate for the Management of Confiscated Property
Deadline	Fourth quarter of 2021
Indicators of results	Vacancies have been filled in accordance with the Rulebook on the Systemisation of Job Positions.
Agency's assessment	The activity was not implemented.

On the implementation of Activity 2.3.5.3.

The Ministry of Justice has reported that the new Rulebook on the Internal Organization and Systematization of Job Positions of the Directorate for the Management of Confiscated Property entered into force in August 2024. Since the adoption of the Rules of Procedure, a competition has been announced in the Directorate to fill two positions in the rank of junior advisor. The competition is ongoing and is expected to be completed by the beginning of February 2025 at the latest.

Bearing in mind that the Ministry of Justice reported that the implementation of the activity is in progress, as well as that there is still work to be done, the Agency assessed the activity as not implemented.

In this report, in the same section of the Revised Action Plan for Chapter 23 – subchapter “Fight against Corruption”, the Agency assessed the implementation of activities related to the following benchmark:

2.3.7. Serbia is establishing initial records of efficient and effective investigations (including financial investigations), prosecutions, convictions and confiscation of assets in corruption cases, including cases of high-level corruption - discussed in 2.3.5). Serbia is applying a zero-tolerance policy on information leaks related to planned or ongoing corruption investigations and imposing sanctions in such situations.

The activities in question are Activities no. 2.3.7.1, 2.3.7.2, 2.3.7.3. and 2.3.7.4, which are presented individually shown below.

Activity 2.3.7.1.

Adopt new regulations and procedures in order to introduce control and control mechanisms in accordance with the analysis of the current state of affairs (normative, organizational and functional), and identify weaknesses and risks (level of data availability, with accurate determination of availability in terms of time and content).	
In charge of activity	• Ministry of Interior
Deadline	First quarter of 2021
Indicators of results	Amended or adopted new regulations and procedures have been amended or new ones adopted, in accordance with the analysis.
Agency's assessment	The activity cannot be assessed.

On the implementation of Activity 2.3.7.1.

The Agency provided an explanation as to why activity 2.3.7.1. cannot be assessed in the Second Implementation Report, i.e. that according to the information provided, The Ministry of Interior applies existing regulations and procedures, but the Agency did not have sufficient information on the basis of which it could conclude whether the procedures have been changed based on the aforementioned analyses.

As the Agency did not receive new information even for 2024, accordingly, it could not assess the

implementation of activity.

Activity 2.3.7.2.

Establish a Working Group in the Ministry of Justice to consider initiatives of the Republic Public Prosecutor's Office concerning the amendments and supplements to the Criminal Procedure Code (based on the Analysis of the normative, organisational and functional frameworks - measures to prevent information leaks and repressive measures to suppress unauthorised communication of criminal procedure data), the Criminal Code and the Law on Public Prosecutor's Office (based on the Analysis of the legislative framework related to criminal, disciplinary and other types of liability in connection with unauthorised disclosure of information). Act in accordance with the conclusions of the working group. (Related to Activity 2.2.10.23)	
In charge of activity	• Ministry of Justice (State Secretary in charge of corruption issues) • Republic Public Prosecutor's Office • Government of the Republic of Serbia • National Assembly of the Republic of Serbia
Deadline	For the creation of the Working Group: first quarter of 2021 For amendments and supplements: until the fourth quarter of 2022
Indicators of results	The Working Group has been established. The law has been amended and supplemented in accordance with the conclusions of the Working Group.
Agency's assessment	The activity was not implemented in the part relating to the adoption of regulations.
	The activity was implemented in the part relating to the education of the working group.

On the implementation of Activity 2.3.7.2.

By the Decision of the Minister of Justice No. 119-01-126/2021-05 as of May 12, 2021, a Working Group for the Analysis of Criminal Procedure was established in order to identify and eliminate its weaknesses and shortcomings and to draft a draft text of the Law on Amendments and Supplements to the Criminal Procedure Code based on the results of the analysis.

By the Decision of the Minister of Justice No. 119-01-125/2021-05 as of May 12, 2021, a Working Group for the Analysis of the Effectiveness of the Criminal Justice System was established, based on completed cases, in order to identify and eliminate its weaknesses and shortcomings and to draft a draft text of the Law on Amendments and Supplements to the Criminal Code based on the results of the analysis. The Working Group meets regularly.

The draft text of the Law on Amendments and Supplements to the Criminal Code was sent to the European Commission for expert opinion on 26 August 2024, together with the accompanying table of compliance with relevant EU regulations. The public consultation was held from 1 October to 1 November 2024, but was extended in the following period, and its adoption is expected in the first or second quarter of 2025. The expert opinion of the European Commission on the text of the Law on

Amendments and Supplements to the Criminal Code was submitted to the Ministry of Justice in mid-November 2024 and is currently being aligned with the comments submitted.

The Agency rated the Activity 2.3.2.7. as two activities. The activity was assessed as implemented in the part referring to the establishment of the working groups, taking into account the deadlines for the second part of the activity, while, the activity was assessed as not implemented in the part referring to the adoption of regulations since amendments and supplements to the regulations were not adopted in 2024.

Activity 2.3.7.3.

Increase the level of IT protection by creating the so-called early warning system and the alarm system.	
In charge of activity	• Ministry of Interior
Deadline	Continuous
Indicators of results	The level of IT protection has been increased. The so-called early warning system and alarm system has been established.
Agency’s assessment	The activity was implemented.

On the implementation of Activity 2.3.7.3.

The Ministry of Interior has submitted information that, during the reporting period, activities were carried out in the reporting period in accordance with the competencies and the normative framework in the field of information security, within which several test alarm systems were implemented in accordance with the domain of competence of the Sector for Analytics, Telecommunications, and Information Technology of the Ministry of Interior. The Ministry of Interior continuously implements the activity, based on test results, and puts the systems that meet the criteria into production mode.

In the course of 2024, within the Computer Emergency Response Team (CERT) of the Ministry of the Interior, activities were carried out in the reporting period in accordance with the competencies and the normative framework in the field of information security, namely: monitoring of the ICT system of the Ministry of the Interior.

Protection against information leakage is included in the protection of the IT system of the Ministry of the Interior, which is why the Agency assessed the activity as implemented.

Activity 2.3.7.4.

Monitor the sanctioning of violations of regulations to prevent the disclosure of confidential information and prepare the analysis of the application of regulations and recommendations.	
In charge of activity	• Ministry of Interior • Republic Public Prosecutor's Office
Deadline	Continuous
Indicators of results	Number of violations of regulations that serve to prevent disclosure of information. Analysis of the application of regulations, with recommendations, has been prepared.
Agency's assessment	The activity was implemented in the part referring to the monitoring of sanctioning violations.
	The activity cannot be assessed in the part referring to the analysis of the application of regulations and recommendations.

On the implementation of Activity 2.3.7.4.

The Ministry of Interior and the Supreme Public Prosecutor's Office provided detailed information on the monitoring of sanctioning of violations of the regulations for the prevention of the disclosing information bearing the mark of confidentiality, which is contained in previous reports.

According to the report of the Republic Public Prosecutor's Office, no notification was submitted to this institution in the reporting period on the existence of grounds for suspicion that a violation of the regulations on preventing the disclosure of information has been committed.

The Agency assessed the activity as two. In the part referring to the monitoring of the sanctioning of violations of regulations preventing disclosure of confidential information, the activity was assessed as implemented, while in the part referring to the analysis of the application of regulations and recommendations, the Agency could not assess the status of implementation because it did not have information on the basis of which it could do so.

TABULAR PRESENTATION OF THE ASSESSMENT OF THE STATUS OF INDIVIDUAL ACTIVITIES IN THE SIXTH IMPLEMENTATION PERIOD

Status of activity	Assessment criteria / Explanation
1. The activity was implemented	The activity is viewed as implemented because: 1. It was completed within the set deadline and in accordance with the steps planned for its implementation and defined result indicators; 2. The purpose of the activity indicates that steps have been taken towards its implementation (especially in the case of continuous activities), even if it is not fully in line with the result indicator.
2. The activity was not implemented	The activity is viewed as not implemented because: 1. It was not completed within the set deadline and in accordance with the steps planned for its implementation and defined result indicators; 2. The purpose of the activity indicates that no steps have been taken, or completed, towards its proper implementation; 3. It is conditioned by the implementation of some other activity, which is either not yet implemented or is currently in the process of being implemented.
3. The activity cannot be assessed	The activity could not be assessed because: 1. No data have been submitted from which it could be determined how the activity is being implemented; 2. The holder of the activity is not defined in an appropriate manner in all the aspects of the implementation of the activity; 3. The activity is not clearly defined and/or it cannot be established whether it has been implemented or not.

LIST OF ABBREVIATIONS AND ACRONYMS

Agency	Agency for Prevention of Corruption
First Implementation Report	First Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter Fight against Corruption
Second Implementation Report	Second Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'
Third Implementation Report	Third Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'
Fourth Implementation Report	Fourth Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'
Fifth Implementation Report	Fifth Report on the Implementation of the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption'
Guidelines	Guidelines for Reporting on the Implementation and Supervision of the Implementation of the Revised Action Plan for Chapter 23 - subchapter Fight against Corruption
Council	Anti-Corruption Council
MoI	Ministey of the Interior
PPOOC	Prosecutor's Office for Organised Crime
SAI	State Audit Institution
HRMS	Human Resources Managament Service
Commissioner	Commissioner for Information of Public Importance and Personal Data Protection
CC	Criminal Code
NALED	National Alliance for Local Economic Development
IPA	Instrument for Pre-Accession Assistance of the European Union
USAID	United States Agency for International Development
OSCE	Organisation for Security and Cooperation in Europe
ODIHR	Office for Democratic Institutions and Human Rights

EU	European Union
SIGMA	Joint initiative of the European Union and the Organization for Economic Cooperation and Development to <i>support for improvement in governance and management</i>
GIZ	German Agency for International Cooperation
DCAF	Geneva Centre for Security Sector Governance
PCIB	Regional Police Cooperation and Integrity Building Programme in the Western Balkans
AP	Autonomous province
LSGU	Local Self-Government Unit
LAP	Local anti-corruption plan
Model	Model Local Anti-Corruption Plan
OPDAT	Office of Overseas Prosecutorial Development, Assistance and Training
CAMS	International certification programme in the field of prevention of money laundering
ACAMS	Association of Certified Anti-Money Laundering Specialists
CFE	International Certification Program for Certified Fraud Examiners
ACFE	Association of Certified Fraud Examiners
BIRODI	Bureau of Social Research
BC	Border crossing
FATF	Financial Action Task Force - an international body whose task is to develop and improve the fight against money laundering and terrorism financing
UNODC	United Nations Office on Drugs and Crime
PA	Police administration
UNDP	United Nations Development Programme
SPC	State Prosecutors Council
CERT	Information System Attack Response Centre
BIA	Security Intelligence Agency
VBA	Military Security Agency
VOA	Military Intelligence Agency

MU	Military units
MFA	Ministry of Foreign Affairs
SCTE	Service for Combating Terrorism and Extremism
OITEA	Office of Information Technology and Electronic Administration
EMPACT	European Multidisciplinary Platform Against Criminal Threats
VAT	Value added tax



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