



АСК РЕПУБЛИКА СРБИЈА
АГЕНЦИЈА ЗА
СПРЕЧАВАЊЕ
КОРУПЦИЈЕ

WORK REPORT for 2020



Republic of Serbia



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WORK REPORT

for 2020

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1.

INTRODUCTION

This document represents the 11th Report of the Anti-Corruption Agency, which is, in accordance with the Law on Prevention of Corruption, submitted annually to the National Assembly of the Republic of Serbia. This is also the first report we submit as the Anti-Corruption Agency.

The year after us was marked by unprecedented epidemiological challenges, which increased the importance of building integrity and consistent implementation of anti-corruption mechanisms. These, for all of us, completely new operating conditions have reaffirmed that without national and international cooperation and sustainable partnerships, we cannot achieve success in preventing and combating corruption. As we are committed to involving all social actors in the common struggle, cooperation with the media and civil society organizations in 2020 was an inseparable part of this process.

In the past year, the implementation of the Law on Prevention of Corruption, readily welcomed by our Agency, began with the adoption of all necessary by-laws, new employment, professional training of employees, as well as comprehensive institutional and technical adjustments, in order to achieve an even higher degree of efficiency and effectiveness in our work.

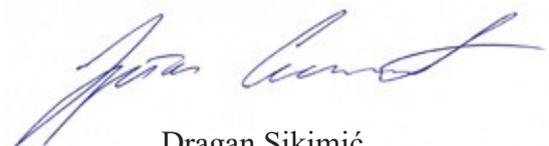
Owing to the adopted normative framework, we have at our disposal new, as well as reinforced already existing mechanisms for preventing corruption, aimed at strengthening personal and institutional integrity, compliance with the rules, but also actions in accordance with the set values, as well as transparency and accountability in the work of public administration, with the aim of systematic protection of the public interest. Most importantly, these mechanisms are aimed at strengthening the trust of citizens in the Republic of Serbia in our work, as it is precisely the citizens to whom we report regarding our methods, decisions and the manner in which we manage public resources.

The support we received from the competent state institutions in the form of creating the basis for strengthening the financial, personnel and technical capacities of the Agency, as well as the support of the international community, have become even more important, bearing in mind that during the last year we made significant, joint efforts to adapt to the new circumstances and ensure the accountability of proper implementation of activities and projects, and thus our preventive, control and supervisory powers.

The Agency is increasingly recognized internationally and we are particularly pleased to point out the fact that in the previous year we were elected president of the Network of Anti-Corruption Institutions for 2021, which brings together anti-corruption bodies from 30 countries in Europe and the world.

We remain fully committed to promoting and nurturing the culture of integrity, as well as the consistent application of anti-corruption mechanisms.

AGENCY DIRECTOR



Dragan Sikimić

2.

LEGAL AND INSTITUTIONAL FRAMEWORK

The Anti-Corruption Agency (hereinafter referred to as the Agency) is an individual and independent state body, with the capacity of a legal entity, which reports to its founder, the National Assembly of the Republic of Serbia, for the performance of activities within its competence. The legal position, jurisdiction, organization and operation of the Agency are regulated by **the Law on Prevention of Corruption**¹ (hereinafter referred to as the Law), which is applicable from 1 September 2020.

Within the legally defined competences, the Agency:

- oversees the implementation of strategic documents, submits a report to the National Assembly on their implementation with recommendations for actions, makes recommendations to the responsible entities on how to eliminate failures in the implementation of strategic documents and initiates amendments to strategic documents;
- adopts general acts;
- initiates and conducts proceedings for deciding on the existence of violations of the law and imposing measures in accordance with the law;
- decides on the conflicts of interest;
- performs activities in accordance with the law governing the financing of political activities, i.e. the law governing lobbying;
- submits criminal charges, requests for initiating misdemeanor proceedings and initiatives for commencing disciplinary proceedings;
- maintains and publishes the Register of Public Officials and the Register of Property and Revenue of Public Officials in accordance with the law;
- verifies the asset and income statements submitted by public officials;
- maintains and verifies data from records determined by the law;
- acts on petitions from natural and legal persons;
- issues opinions on the application of this Law, acting on its own initiative or at the request of natural or legal persons and takes positions on the implementation of the Law;
- initiates the adoption or amendment of regulations, issues opinions on the assessment of the risk of corruption in draft laws in the fields of particularly risk of corruption and opinions on draft laws governing issues covered by approved international agreements in the field of prevention and combat against corruption;
- investigates the state of corruption, analyses the risks of corruption and prepares reports with recommendations to eliminate such risks;
- oversees the adoption and implementation of integrity plans;
- adopts training programs and instructions for training in the field of prevention of corruption and monitors the implementation of training in public institutions;
- performs international cooperation activities in the field of prevention of corruption;
- performs other tasks specified by the law.

By applying the Law on Lobbying and respecting the ethical rules from the Code of Conduct of Participants in Lobbying, conditions have been created for lobbying to be an important means of strengthening democracy in the Republic of Serbia, based on transparency, the rule of law and social responsibility. Through the legal regulation of lobbying, the publicity and transparency of the work of state

¹ Official Gazette of RS No. 35/19, 88/19 and 11/21-authentic interpretation

administration is increased, strengthening the integrity and accountability of public officials as lobbied persons, protecting the public interest and increasing the citizen's trust in the decision-making process.

Recognizing the importance of this activity, the Republic of Serbia has joined a small number of countries in the world that have legally regulated the issue of lobbying and made this process transparent.

The Agency's competences established **by the Lobbying Act**² are as follows:

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

The Agency also acts in relation to political entities, and its competences are established **by the Law on Financing of Political Activities**³. By controlling the annual financial statements and reports on election campaign expenses of political entities, as well as publishing their contents, the Agency informs the public about the collection and spending of funds of political entities for regular work and election campaign. At the same time, through its control and supervisory role, the Agency reacts to observed violations of the law and submits reports to the competent authorities.

The preventive role of the Agency is reflected in the provision of expert assistance to responsible persons in political entities regarding doubts about the implementation of the law. In accordance with this Law, the Agency is responsible for:

- control of financing of political entities;
- keeping records of financial statements of political entities;
- organizing and coordinating the monitoring of election campaigns;
- giving opinions and instructions on the implementation of this Law.

² Official Gazette of RS No. 87/18 and 86/19

³ Official Gazette of RS No. 43/11, 123/14 and 88/19

The Agency's work is also regulated by bylaws:

- Rulebook on the Register of Public Officials and the Register of Property and Revenue of Public Officials⁴;
- Rulebook on Gifts for Public Officials⁵;
- Rulebook on the manner of submitting a notice of participation in a public procurement, privatization or other procedure the outcome of which is the conclusion of a contract with a public authority;
- Rulebook on Records and Reports of Political Entities⁶;
- Rulebook on Acting on Petitions⁷;
- Instructions on the procedure for concluding the agreement on the recognition of misdemeanors - published on the Agency's website;
- Instructions for conducting training in the field of prevention of corruption and strengthening of integrity⁸ and Instructions on amendments to the Instructions for conducting training in the field of prevention of corruption and strengthening of integrity⁹;
- Instructions for the development and implementation of the integrity plan;
- Instructions on how to report on the implementation of strategic documents;
- Training program in the field of prevention of corruption and strengthening of integrity – published on the Agency's website.

The Agency adopted and harmonized other normative acts, as follows:

- Rulebook on election campaign monitoring - published on the Agency's website;
- Rulebook on the internal whistleblowing procedure – published on the Agency's website;
- Rulebook on the manner of conducting public procurement - published on the Agency's website;
- Rulebook on Stamp and Seal;
- Rulebook on the manner and deadlines for listing and reconciling the accounting situation with the actual situation;
- Rulebook on amendments to the Rulebook on lobbyist training program;
- Rulebook on amendments to the Rulebook on appearance and content of forms and record-keeping in the lobbying procedure;
- Rulebook on amendments to the Rulebook on the implementation of the public competition for the allocation of funds to civil society organizations for the implementation of anti-corruption projects - published on the Agency's website;

4 Official Gazette of RS No. 118/ 20

5 Official Gazette of RS No. 118/ 20

6 Official Gazette of RS No. 148/20

7 Official Gazette of RS No. 126/ 20

8 Official Gazette of RS No. 114/20

9 Official Gazette of RS No. 145/20

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- Rulebook on amendments to the Rulebook on the filling of posts in the Anti-Corruption Agency's - published on the Agency's website;
(The new Rulebook on internal planning and systematization of jobs in the Agency was submitted to the competent committee of the National Assembly for approval).
 - Decision amending the Code of Conduct for Lobbying Participants;
 - Act on amendments to the guidelines for the cooperation of the Anti-Corruption Agency with civil society bodies - published on the Agency's website and
 - Decision amending the rules for the preparation of decisions and other written documents of the Agency.

3.

AGENCY'S ORGANISATIONAL STRUCTURE, PERSONNEL AND TECHNICAL CAPACITIES

Director

The Director represents the Agency and manages the work of the Service, organizes and ensures the lawful and effective performance of tasks, adopts general and individual acts, decides on requests of public officials in accordance with the Law, makes decisions on violations of the law and dictates measures, gives opinions and instructions for law enforcement, submits to the National Assembly an annual report on the work of the Agency and a report on the implementation of strategic documents, drafts a proposal of budgetary resources for the work of the Agency, decides on the rights, obligations and responsibilities of employees of the Agency, implements decisions of the Agency's Council and performs other legally determined tasks.

The Director is elected on the basis of the Rulebook and the Test Program for the selection of the director of the Anti-Corruption Agency ¹⁰in a public competition announced by the Ministry of Justice and conducted by the Judicial Academy. After the public competition, the director is elected by the National Assembly by a majority vote of all parliament members. The term of office of the Director is five years, and one person may be elected as Director no more than twice.

Council

The Council of the Agency, as a second-instance body, decides on appeals against decisions on violations of the Law issued by the Director, supervises his work and personal property status, and takes principled positions in regards to the implementation of the Law. The members of the Council are elected on the basis of the Rulebook and the Test Program for the selection of the members of the Council in the Anti-Corruption Agency, in a public competition announced by the Ministry of Justice and conducted by the Judicial Academy. After the public competition, members of the Council are elected by the National Assembly by a majority vote of all parliament members. The Council of the Agency has five members, their term of office is five years, and one person may be elected as a member of the Council no more than twice.

The Ministry of Justice announced an open competition for the election of Council members, but the election process was not completed during the reporting period.

Professional Service

The Agency achieves comprehensive multidisciplinary approach to the prevention of corruption through sectorial organizational, so in addition to resolving the conflict of interest and cumulating of public functions, checking the assets and revenues of public officials, keeping registers and controlling the financing of political activities, the Agency also improves international cooperation, cooperation with civil society organizations and the professional public, on a daily basis. Conducts planned, comparative research into the phenomenon of corruption in the region and beyond. According to its basic preventive role, the Agency is committed to supporting public authorities in

¹⁰ Official Gazette of RS No.114/20

the development of analyses, models of internal rules, procedures, methodologies, strategic and operational documents with the aim of prevention of corruption. The Agency consists of ten basic units and two special internal units. Sectors, as basic organizational units, consist of departments, divisions and groups.

In 2020, according to the public tender number 014-111-00-0009/19-09/2 of 18 September 2019, a total of 19 new employees were admitted to fill executive posts in the Anti-Corruption Agency, of which five senior advisers, seven independent advisers, two advisers, one associate, three clerks and one external employee. As of 31 December 2020, 96 persons were employed in the professional service of the Agency out of a total of 163 which are planned, which represents 58.9% of the occupancy of posts.

Strategic and operational planning of human resources and anticipation of future requirements in the area of knowledge and skills of employees, arising from the competence of the Agency, were implemented by training 19 new employees on the competences of each internal unit. The 2020 vocational training and additional education program was implemented through the programs of the National Academy of Public Administration and training organized by international partners.

The previous year was particularly challenging for the area of financial operations. Through careful redistribution of budgetary resources, the Agency has created the possibility to finance and implement all planned and additional activities within the prescribed deadlines. In a year that is simultaneously the year of holding elections at all levels, which carries specific legal obligations for the Agency, the necessary budget reduction of 20% has not disrupted the necessary technical preconditions for the smooth monitoring of parliamentary elections.

Primarily focused on the lives and health of the employees in preventing the occurrence and spread of infectious diseases, with the regular implementation of preventive measures for safe and healthy work, the Agency has simultaneously improved other measures of protection and equipment and with the support of the Directorate for Joint Affairs of Republic Authorities, improved the existing infrastructure capacities.

During the reporting period, the Agency made significant efforts and resources to fully restore the information system. This modern information system, which fully coordinates, monitors and controls the flow of business data, is a necessity for Agency's regular activities, as well as the Agency's participation in significant state projects, such as the National Criminal Intelligence System (NCIS). This system is one of the obligations of the Republic of Serbia from the Action Plan for Chapter 24, that is, the set standard in the field of safety and security. As one of the signatories of the Agreement on Cooperation in Establishing a System for Combating Serious Crime, the Agency has fulfilled the IT conditions for connection to the NCIS. Through the procurement of computer and server equipment that will form the basis of the new information and communication system the Agency also created technical and security conditions for the connection and full application of the NCIS.

Cooperation and preliminary arrangement has been established with the Office for Information Technologies and Electronic Administration for the purpose of remote data copy. The State Data Centre in Kragujevac was selected as the location, which is one of the most important digitization projects of the Government of the Republic of Serbia, where data are stored according to the highest technical and security standards.

The Law on the Budget of the Republic of Serbia for 2020¹¹ provides funds in the amount of RSD 312,878,000.00 for the work of the Anti-Corruption Agency. Amendments to the financial plan for 2020 in accordance with the Regulation on amendments to the general revenue and income, expenditure and costs in the budget of the Republic of Serbia for 2020 to eliminate the harmful consequences of the COVID-19 disease caused by SARS-CoV-2 05 Number: 110-3398/2020¹², and the Law on Amendments to the Law on the Budget of the Republic of Serbia for 2020¹³, the final amount of funds for the Agency's work for 2020 amounted to RSD 292,579,000.00.

The total budget execution in 2020 amounted to RSD 276,436,247.35, which is 94.48% of the approved funds. Unspent funds have been returned to the budget of the Republic of Serbia.

11 Official Gazette of RS No. 84/19

12 Official Gazette of RS No. 60/20

13 Official Gazette of RS No. 135/20

4.

PERSONAL AND INSTITUTIONAL INTEGRITY

A public official is obliged to perform a public function **conscientiously and responsibly**. The public interest shall not be subordinated to the private interest and the public post shall not be used for the purpose of obtaining any benefit for itself or a related party.

A situation in which a public official has a private interest that affects, may affect or appears to affect the performance of a public office constitutes a **conflict of interest**. The Anti-Corruption Agency has exclusive competence to decide on conflicts of interest in the performance of public functions in proceedings initiated ex officio, and on complaints submitted by natural and legal persons.

Responsible performance of public office is reflected, inter alia, in the **regular reporting on personal assets and revenues to the Agency upon assuming the post, during the performance of the public post, as well as upon the termination of public post**. According to the annual plan, the Agency checks the timeliness of submitting reports on the personal assets and revenues of public officials (hereinafter: the Report), as well as the accuracy and completeness of the data in them, for a certain number and categories of officials. During the process of verifying the report, the financial situation of officials is monitored, that is, whether there is a discrepancy between the data presented in the report and the actual situation, as well as a discrepancy between the increased value of the assets of officials and their legal and reported incomes. Verification of reports and monitoring of the property situation during and after the performance of a public post is a strong mechanism for preventing corruption, which contributes to strengthening the personal integrity of public officials and leads to the strengthening of the institutions in which they perform the public functions. Also, by checking the reports of public officials, the Agency makes a significant contribution to the work of the repressive authorities in resolving cases where corruption or other irregularities are suspected.

Based on a timely notification from the public authorities, which are obliged to inform the Agency of the entry into public office or the termination of the public office, a **Register of Public Officials** is kept by the Agency. By publishing a part of the data from the submitted Reports on the Agency's website, the data on the assets and revenues of public officials are available to the public. This legal obligation contributes to strengthening their integrity and removes doubts about the conscientious and responsible performance of public office.

When performing a public office, there are often encounters with domestic and foreign officials and it is a common protocol practice to exchange gifts. By maintaining and publishing the **Gift Catalogue**, the Agency provides the public with an insight into the type and value of gifts received by the public official during the calendar year. This responsible record-keeping of received protocol gifts, and reporting of the Agency on their monetary value and their preservation in public ownership, are strengthening the integrity of the institutions.

Keeping and publishing **records of legal entities in which a public official or family member owns more than 20% of stocks or shares** enables the control of abuse of public office for the purpose of obtaining any benefit, for himself/herself or a family member. Establishing true, accurate and complete registers and records and regularly updating the data in them is a basic prerequisite in the process of controlling the legality of the performance of a public office.

5.

MECHANISMS FOR THE PREVENTION OF CORRUPTION

Conflict of interest in the performance of public functions and cumulating of public functions

Key results

- **1510 procedures related to the resolution of conflicts of interest were completed**, which is by 13.11% more than the previous year.
- **875 public officials' requests for approval were resolved**, which is by 58.23% more than in 2019;
- **During the election campaign, the Agency acted very efficiently in 50 cases related to the abuse of office and public resources and made decisions within a new legal deadline of five days.**

Other results within the area of competence

The Agency is the only body competent to decide on conflicts of interest in the performance of public functions, which has been recognized by both the public officials and the citizens. This is indicated by the fact that during 2020, a total of **1906 cases in the field of conflicts of interest** were received, which is by 33.56% more than in 2019.

This number shows that the moral standard of public officials is rising and a proper understanding of the rule to first contact the Agency for approval (for the performance of another public function, or other work or activity, for membership in the bodies of associations, for the establishment of an employment relationship or business cooperation after the termination of the public office – "revolving doors"). Out of the stated total number of received cases, the Agency received 1050 public officials' requests for approval, which is by 71.57% more than in 2019.

In addition to the aforementioned requests for approval:

- we received 399 requests for opinions on the implementation of the Law on the Anti-Corruption Agency or the Law on the Prevention of Corruption, which is by 22.02% more than in 2019;
- 439 procedures were initiated to determine violations of the law, namely 276 based on the submitted reports, which is by 12.20% more than in 2019, as well as 163 ex officio procedures;
- 12 notifications on the transfer of management rights were given;
- 6 requests for obtaining data were received.

875 public officials' requests for approval were resolved, which is by 58.23% more than in 2019; Requests were submitted due to: cumulating of public offices, that is, the performance of another work or activity; membership in the bodies of associations; the establishment of an employment relationship or business cooperation after the termination of the public office – "revolving doors"), of which:

- in 722 cases, the Agency has given its approval for the performance of another public office, or for the cumulating of public offices, for the performance of another work or activity, for membership in associations, for the establishment of an employment relationship after the termination of the public office, and has informed the public officials regarding the situations of conflict of interest;
- 84 decisions were adopted rejecting the request of a public official for approval of the performance of another public office, or for the performance of another work or activity;
- 69 procedures were completed in another way (by adopting a decision rejecting the request as untimely or non-qualifying, i.e., by adopting a decision on the suspension of the procedure, giving notice that the Agency is not competent and by means of an official note.

The Agency has issued **371 opinions on the implementation of the Law**, which is by 8.16% more than in 2019.

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

- 111 decisions imposing a warning measure;
- 18 decisions imposing a measure of public disclosure of a recommendation for dismissal from the public office;
- 33 decisions determining the violation of the law and the imposed measure of public disclosure of the decision on the violation of the law;
- 17 decisions declaring the termination of office by force of law, of which in 3 cases a warning measure was imposed;

In 97 procedures initiated ex officio and on the basis of the report, no violation of the law was established and they were resolved in another way (by means of a decision on suspension of procedure, informing the parties that there are no grounds for conducting the procedure, by means of an official note and by informing the parties that the Agency is not competent). The Agency completed six procedures by submitting the requested information and evidence to other authorities.

The largest number of proceedings, a total of 170, were initiated due to a suspicion of a situation of conflict of interest, while other proceedings, a total of 167, were initiated against officials who perform another public office, or several public offices, without the consent of the Agency.

In the reporting period, the largest number of decisions determining the violation of the Law, a total of 71, was imposed on public officials due to the cumulating of public functions, while the other measures, 54 of them, were imposed on public officials in situations that represent conflict of interest and nepotism.

Out of a total of 71 decisions imposed on public officials for the cumulating of public offices, the Agency imposed 40 warning measures, 17 decisions determining the termination of the second public office by force of law, of which in three cases warning measures were also imposed. The Agency also imposed 12 warning measures and two measures of public disclosure of the decision on the violation of the law.

In situations that represent conflict of interest and nepotism, out of a total of 54 measures, seven warning measures were imposed, and 14 measures of public disclosure of a recommendation for dismissal from the public office. The Agency also imposed two warning measures and 31 measures of public disclosure of the decision on the violation of the law.

Due to the non-transfer of management rights in the company, the Agency imposed a total of 10 measures, namely seven warning measures and three measures of public disclosure of the decision on the violation of the law.

With regards to the imposed measures of public disclosure of recommendations for dismissal in situations that represent a conflict of interest, 10 measures were imposed on public officials who perform public functions in bodies of local self-government units (four municipal presidents, one mayor, one president of the municipal assembly, two members of the municipal council, two directors of public companies), five measures were imposed on officials who perform public functions in institutions of education (three principals of primary schools, one director of a music school and one director of an agricultural school), one measure was imposed on a public official who performs a public function in a health care institution - the director of a special hospital.

Decisions of the Agency were largely being respected, so that 70 public officials stopped simultaneously performing incompatible public functions, i.e. performing certain work and activities, which is 97.22% of the number of executive decisions of the Agency.

Four public officials filed a lawsuit with the Administrative Court against the final decisions of the Agency rejecting the request for approval for the performance of another public office, or the performance of another work or activity.

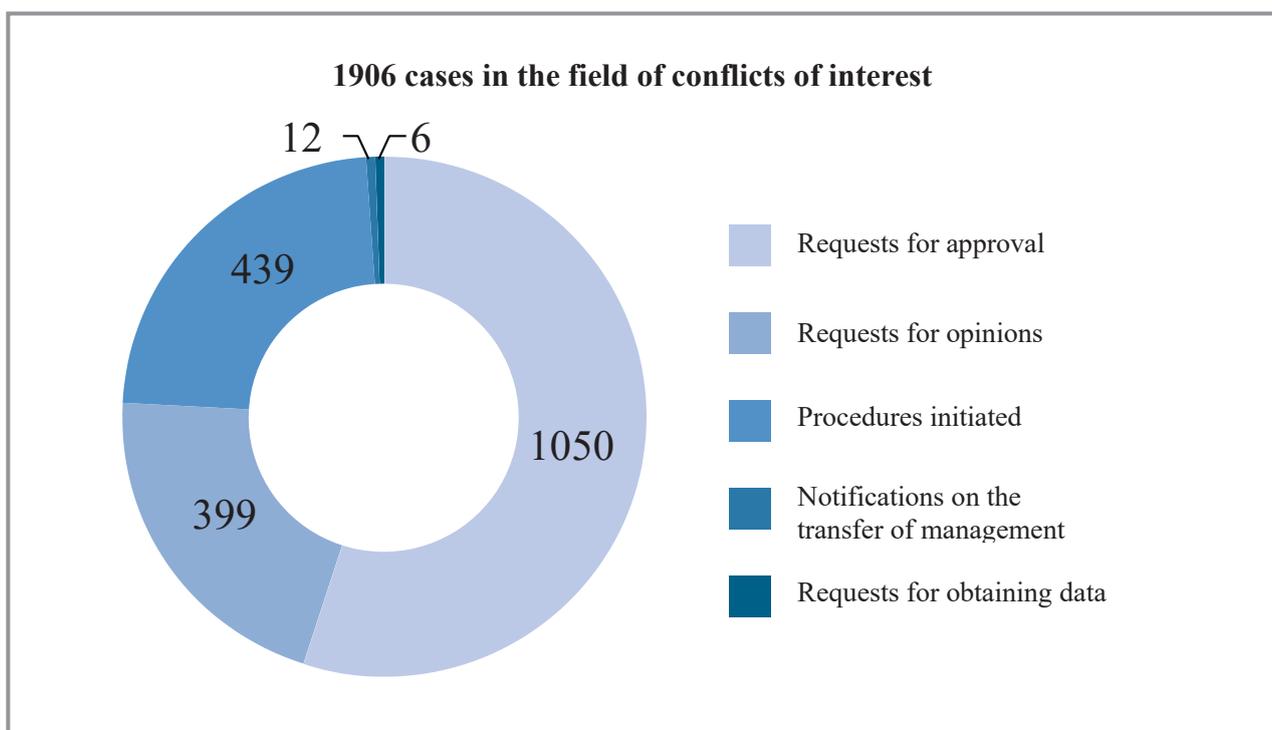
Against the final decisions of the Agency, nine public officials filed a lawsuit with the Administrative Court, four of them were against the decisions imposing a measure of public disclosure of a recommendation for dismissal from the public office, three against the decision imposing a measure of public disclosure of a decision on the violation of the law, one against the decision imposing a warning measure and one against the decision determining the termination of the second public office by force of law.

The competent authorities acted on 13 executive decisions of the Agency determining the termination of the second public office by force of law, which in percentage amounts to 100%.

Due to violations of the provisions of the Law in the field of conflicts of interest, two requests for initiating misdemeanor proceedings were submitted.

In the reporting period, misdemeanor courts submitted to the Agency first-instance judgments in 11 procedures determining the responsibility of public officials for the committed misdemeanor. The courts imposed three monetary fines, two in the amount of the legally prescribed minimum of RSD 50,000.00, one in the amount of RSD 30,000.00 and three warnings. Four proceedings ended with the adoption of decisions establishing that the conduct of misdemeanor proceedings has entered the stage of limitation of legal proceedings (suspension), and in one procedure the public official is absolved of responsibility.

In two cases, the misdemeanor appellate court adopted the Agency's appeal and amended the first instance judgments by imposing fines instead of a warning (in the amount of RSD 20,000 and 50.00 RSD 30,000.00), while in one case, upon the appeal of the defendant against the judgment imposing a fine of RSD 30,000.00, a decision to suspend proceedings was issued.



In addition to legal remedies, in preventing and resolving conflicts of interest, the Agency has placed great emphasis on educational measures to spread awareness of the harmfulness and immorality of prohibited acts and omissions that represent a conflict of interest.

In cooperation with *the USAID* Project for Responsible Government, after the implementation of the Law on Prevention of Corruption, the Agency developed and published on its website the Manual for the Recognition and Management of Conflicts of Interest, which enables the understanding of the concept of conflict of interest and informing of all risk categories that may enter a conflict of interest. This Manual is available on the Agency's website at the following link: <http://www.acas.rs/wp-content/uploads/2020/11/Conflict-of-Interest-MANUAL-for-Website-30Oct20FINAL.pdf>. The Agency also presented this Manual through training sessions held for public officials in order to familiarize them with the obligations under the Law on Prevention of Corruption. There were 3 of these trainings in 2020, and they were held online within the Service Contract entitled „Prevention and Combat against Corruption" financed by the EU from *the IPA* 2013 program.

Also, video material was produced – a conflict-of-interest film that points to potential conflict-of-interest situations, including dissemination and awareness raising component. This film is available on the Agency's website, i.e. the official *YouTube* channel of *MyIntegrity* at the following link: <https://www.youtube.com/watch?v=KCoV0KRJb1g&t=12s>. The video material was also made available through the Agency's official social media accounts. The aforementioned manual and film are activities that were planned within the Revised Action Plan for Chapter 23.

Verification of income and assets of public officials

Key results

- **reports on assets and income (hereinafter: report) of 262 public officials were checked and 57 proceedings were initiated for violation of the provisions of the Law** against public officials who are deputy ombudsmen, directors, acting directors or earlier directors of public companies and economic entities in which they perform or performed public functions. After the initiated procedures, a total of 61 measures were imposed for violation of the provisions of the Law.
- **Four criminal charges/reports were filed with the competent prosecutors' offices due to the existence of reasonable doubt that public officials did not declare assets to the Agency or provided false information, in order to conceal information about assets**, or due to reasonable suspicion that they committed some other criminal offense for which prosecution is undertaken ex officio.

Other results within the area of competence

The annual report verification plan for 2020 covers **103 public officials, namely the Attorney General and Deputy Attorney General, the Attorney General and Deputy Attorney General of AP Vojvodina, the City Attorney and Deputy City Attorney of the City of Belgrade and the City Attorney and Deputy City Attorney in 26 cities in the Republic of Serbia.**

Also, during 2020, a **total of 14 additional checks of reports of public officials were initiated** due to the suspicion that accurate and complete data were not reported in the reports.

A total of 53 report verification procedures were transferred from 2019, in which the annual report verification plan included directors and acting directors of public companies and economic entities (current and former) whose founders/members are the Republic of Serbia, the Autonomous Province of Vojvodina and local self-government units.

According to criminal charges and reports filed with competent prosecutors' offices in the course of and before 2020, one conviction was passed imposing a suspended sentence on the defendant, one acquittal was confirmed, one indictment was filed, applying the principle of opportunity, three criminal charges were dismissed, two criminal charges were dismissed because there were no elements for prosecution undertaken ex officio and in 16 cases evidentiary actions are under way.

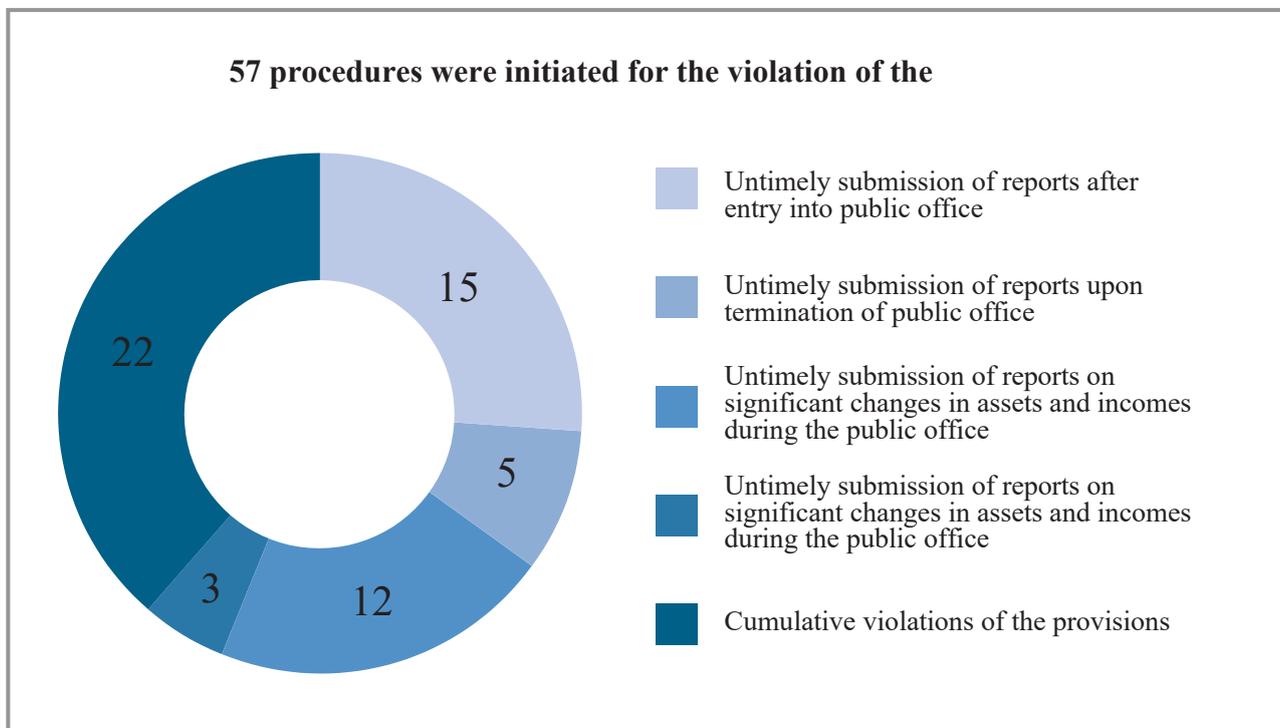
During 2020, no appeal against the decisions of the Agency's directors imposing warning measures or warnings was submitted to the Board or the Agency's Council. In one case, the Administrative Court rejected the plaintiff's action filed against the Agency's Board Decision, which

confirmed decision of the Director of the Agency to impose a warning measure for violation of the provisions of the Law governing the area of declaration of property and income of public officials.

In 2020, the Misdemeanor Court in Belgrade issued a total of 11 decisions based on requests for initiating misdemeanor proceedings submitted before and during 2020.

Four reports were submitted to other competent state bodies (Tax Administration - one, Administration for the Prevention of Money Laundering – three), due to the existence of reasonable suspicion that officials, whose assets and incomes were subject to checks, committed some other criminal offence within the competence of that authority.

A total of 11 requests for initiating misdemeanor proceedings for untimely submission of the Report on Asset and Incomes were submitted.



In cooperation with the international expert team of the USAID project, an analysis of the existing procedures of the Anti-Corruption Agency was launched, targeting the Agency's verification of the Report on the Assets and Incomes of Public Officials. In this way, new possibilities for the collection and processing of data obtained by the Agency from other state bodies have been developed, and analytical tools for the processing of obtained data have been improved, all with the aim of ensuring the most efficient verification procedures.

Also, within the implementation of this activity, meetings were held with representatives of state bodies with whom the Agency cooperates in the collection of data and documentation in the process of verifying reports (Tax Administration, Republic Geodetic Office, Ministry of the Interior, Administration for the Prevention of Money Laundering, Business Registers Agency).

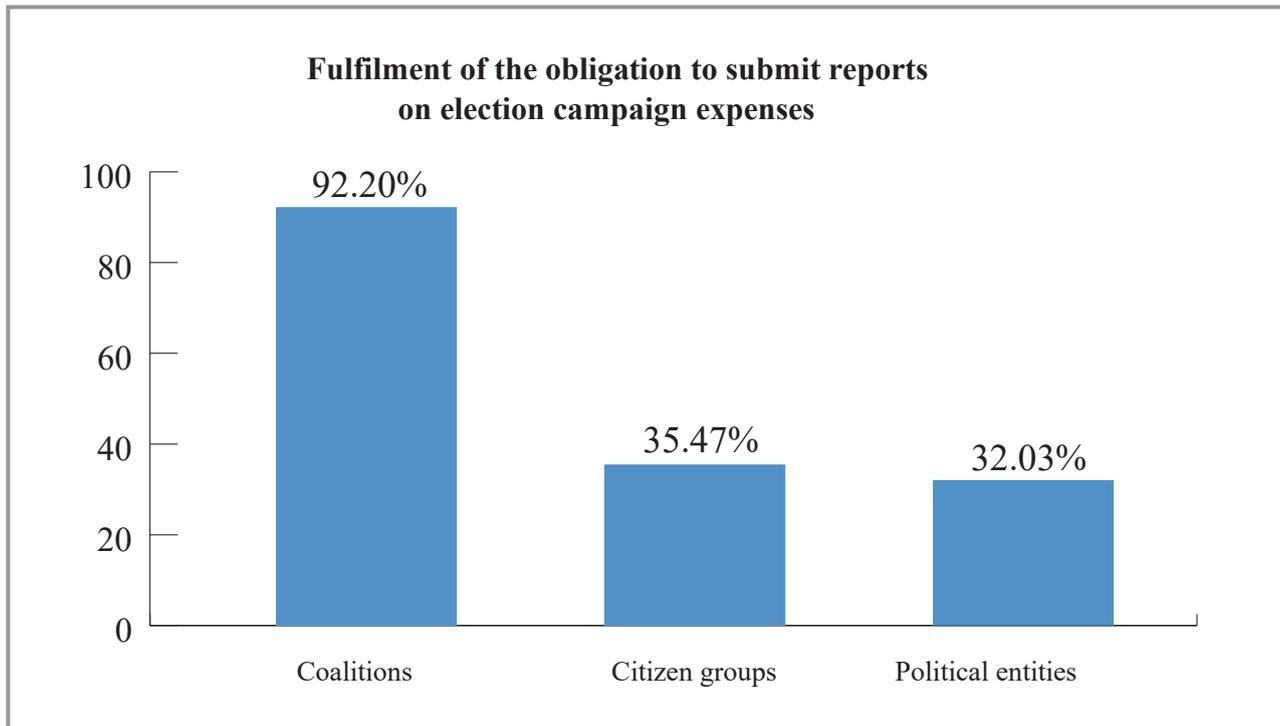
Control of financing of political activities

Key results

- **55 proceedings were initiated for suspicion of violation of the Law on Financing of Political Activities**, 35 of which relate to election campaigning (34 per complaints during the election campaign and one ex officio).
- **A total of 28 warning measures were imposed**, seven of which were issued on the basis of reports filed against political entities (five related to the election campaign), and 21 warning measures were issued ex officio, based on the control of reports submitted by political entities.
- **One report was filed with the competent prosecutor's office due to the suspicion that the responsible person in the political entity committed a criminal offence.**
- Due to violations of the provisions of the Law on Financing of Political Activities, the **Agency submitted a total of 255 requests for initiating misdemeanor proceedings.**
- Based on final judgments, **nine decisions were made on the loss of the right to obtain funds from public sources intended for financing regular work in the coming year.**

Other results within the area of competence

In 2020, the Agency controlled reports on election campaign expenses for the election of parliament members and councilors. The results of the control were published on the Agency's website, in the form of the **Report on the Control of the Financing of Political Activities for 2020 – Report on the Control of Election Campaign Costs in 2020**. The control related to the activities of political entities from the date of calling the elections to the date of announcing the results.

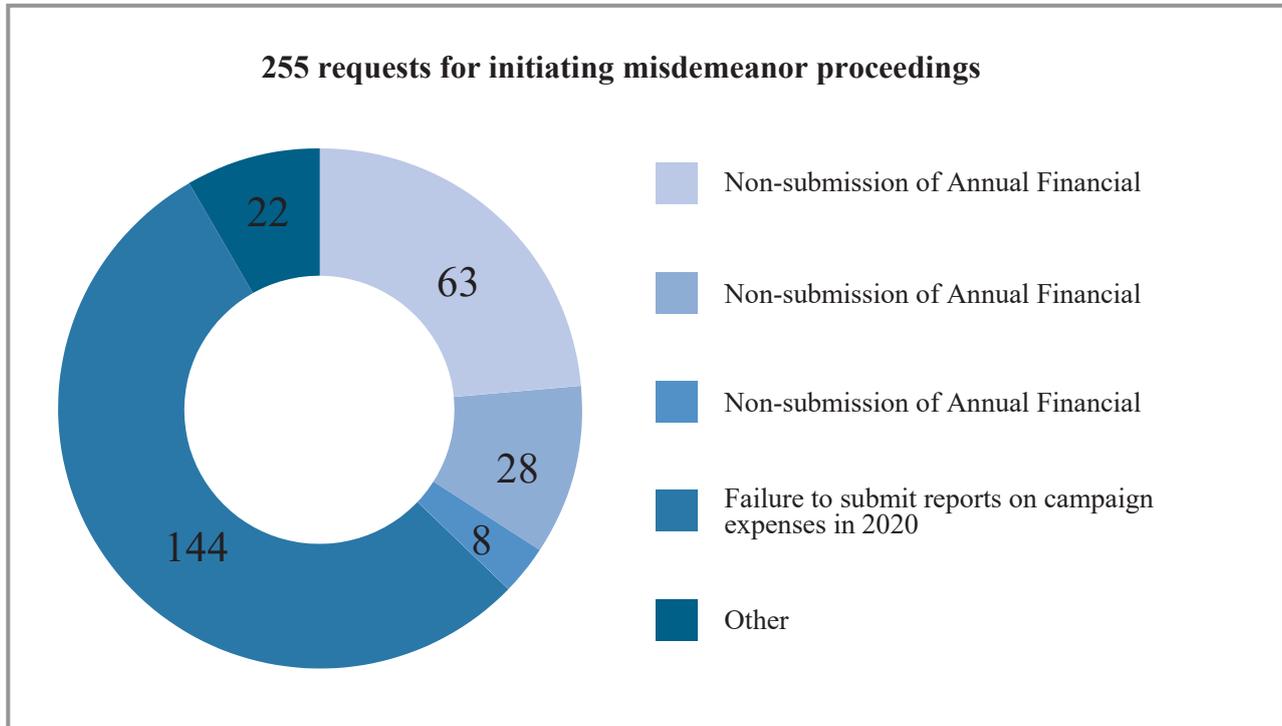


In addition to the analysis of sources of financing and costs of election campaigns for a total of 67 political entities, the reports contain an overview of observed irregularities and possible violations of the Law on Financing of Political Activities, as well as data on submitted requests for initiating misdemeanor proceedings before the competent court.

In addition to 67 political entities for which the findings of the control were published in the reports on election campaign costs, 22 annual financial statements of political entities for 2019 were also controlled, the results of which were published on the Agency's website in the form of the **Report on the Control of the Financing of the Costs of Political Activities for 2020 – Report on the Control of the Annual Financial Statements of Political Entities for 2019**.

Due to violations of the provisions of the Law on Financing of Political Activities, the Agency submitted to the competent misdemeanor court a total of **255 requests for initiating misdemeanor proceedings** against political parties and responsible persons in political parties, responsible persons of groups of citizens.

The decision on the loss of the right to obtain funds from public sources is made on the basis of a final judgment of the misdemeanor court by which a monetary fine was imposed. As 2020 was an election year, and the groups of citizens from the previous convocation ceased to exist, and some political parties that did not participate in the elections did not win mandates, the Agency adopted these decisions in accordance with the Law.



By 15 April of the current year, all registered political parties, as well as groups of citizens who have representatives in the representative bodies are obliged to submit to the Agency the Annual Financial Report for the previous year, as well as the Report on Incomes and Assets (hereinafter: AFR), with the previously obtained opinion of the certified auditor. As the deadline for submitting the AFR for 2019 expired during the state of emergency declared for epidemiological reasons, in accordance with the Regulation on the application of deadlines in administrative procedures during the state of emergency¹⁴, the deadline for submitting this report¹⁴ was extended to 5 June 2020.

In 2020, 248 political entities had the obligation to submit the AFR for the previous year, of which 113 political parties and 135 groups of citizens. 111 political entities fulfilled the legal obligation, 68 of them were political parties and 43 were groups of citizens. Five political entities did not submit reports in electronic form, but only in printed form, so these reports are not in the electronic records nor on the Agency's website.

¹⁴ Official Gazette of RS No. 41/20

The Agency controlled 22 political entities that submitted Annual Financial Reports for 2019. The criteria taken into consideration when selecting the report for the annual control plan were:

- political entities with the highest declared incomes on duly submitted I1 forms in 2019,
- political entities with the highest declared expenditure in 2019,
- political entities with the highest income/expenditure gap in 2019 and
- all parliamentary political parties.

The control covers 96.33% of the total collected funds and 93.69% of the total funds spent by all political entities that submitted Annual Financial Reports for 2019. In the formal and substantive control procedure, irregularities were observed:

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

All political entities with declared electoral lists in the elections held in 2020 (949 entities) were obliged to submit to the Agency, within 30 days from the date of publication of the final results, a Report on election campaign costs (hereinafter: I2 report) with data on the origin, amount and structure of funds collected and spent, from both public and private sources. 747 political entities fulfilled the legal obligation, i.e. 78.71% of the total number of political entities obliged to submit a report.

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

- non-submission of the I2 report to the Agency,
- delay in submission of the I2 report to the Agency,
- incorrect presentation of funds in the I2 report submitted to the Agency,
- non-opening of a special account for the purpose of raising and spending funds for the election campaign.

Keeping registers and records

Key results

- **Establishment of new application software** and greater efficiency of data entry and updating of records and registers maintained by the Agency.
- **Established new forms of WEB forms for reporting assets and income, reporting of public officials, gifts and public procurement, privatization or other procedure**, in accordance with the Law on Prevention of Corruption, which will contribute to a more efficient reporting and display of publicly available data in registers and records maintained by the Agency.

Other results within the area of competence

In 2020, a total of 2,392 notifications were received from the authorities which are obliged to inform the Agency that a public official has entered into a public office or that his public office has ceased.

The total **number of registered public offices** in the Register of Public Officials is 81,519, of which **35,454 are active**.

In 2020, 7,114 reports were received, while 2,335 were processed and verified.

From the establishment of the Agency until the end of the reporting period, the total of 59,374 reports were processed and published.

The 2019 gift catalogue was published within the legally prescribed deadline by June 1, 2020 and contains 681 gifts.

The most common gifts are: paintings, drinks, books, souvenirs, plates, art pieces, plaques. The largest number of gifts were reported by: the General Secretariat of the President of the Republic, the RS National Assembly, the Ministry of Defense, the Military Intelligence Agency and the RS Government.

During 2020, eight legal entities, in which a public official or family member owns more than 20% of stocks or shares, submitted 81 notifications on participation in public procurement, privatization or other proceedings to the Agency, as well as 63 notifications on the completion of the procedure.

In 2020, a total of 24 lobbyists were registered in the Register of Lobbyists, while two legal entities were registered in the Register of Legal Entities Performing Lobbying.

A total of 173 proceedings were initiated, as follows: 26 proceedings against public officials who perform public office at the republic level, two at the provincial level and 145 proceedings against public officials who perform public office at the local level.

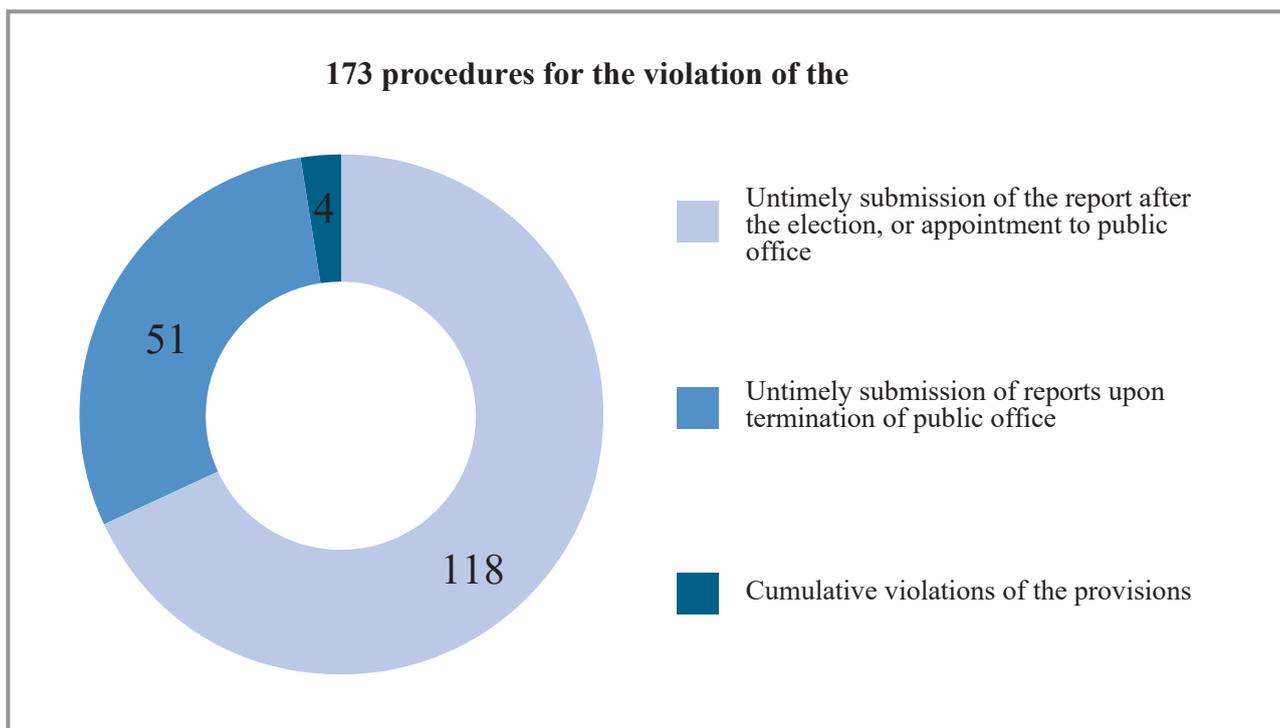
The following procedures were initiated:

- due to untimely submission of the Report after the election, appointment to public office – 118
- due to untimely submission of the Report upon termination of public office – 51
- due to cumulative violations of the provisions of the Law - 4

A total of 163 measures were imposed due to the violation of the Law on Prevention of Corruption, namely: 151 warning measures, i.e. notices, nine measures of public disclosure of the decision on the violation of the law and three measures of public disclosure of the recommendation for dismissal.

The structure of the imposed warning measures or notices was as follows:

- due to untimely submission of the Report after the election, or appointment to public office – 96
- due to untimely submission of the Report upon termination of public office – 43
- due to cumulative violations of the provisions - 12



In 2020, a total of 18 requests were submitted **for initiating misdemeanor proceedings due to untimely submission of the report after the election, or appointment to public office, or upon termination of public office.**

In 2020, the Misdemeanor Court in Belgrade issued a total of 75 decisions based on requests for initiating misdemeanor proceedings submitted before and during 2020.

During 2020, **nine criminal charges** were filed with the competent prosecutors' offices due to the existence of reasonable doubt that public officials, in order to conceal assets, did not declare assets to the Agency or provided false information about assets.

Lobbying

The Agency continued all activities legally entrusted to it in the field of lobbying, namely the activities related to the training, records and control of this important segment in the process of the enactment of the law. Although during the reporting period there were necessary restrictions on physical gathering, the **Agency successfully organized five training sessions for lobbyists attended by 65 candidates**. After the completion of a knowledge test, the participants were given Certificates of completed training for lobbyists.

25 decisions on registration in the Register of Lobbyists were adopted, as well as two decisions on registration in the Register of Legal Entities Performing Lobbying.

6.

ELECTIONS IN 2020

Key results

- Effective action within the legal deadline of five days;
- **Four measures of public disclosure of a recommendation for dismissal and seven warning measures** related to the abuse of office and public resources were imposed;
- **Five warning measures were issued and three requests were submitted for initiating misdemeanor proceedings for political entities** regarding the election campaign.

The election campaign is a set of activities of political entities starting from the date of calling the elections and ending on the date of announcing the final results.

Following the announcement of the republic, provincial and local elections in March 2020, the Agency, within its competence, successfully responded to the challenge of applying the new legal provisions related to the prohibition of the abuse of public office and public resources and within a new legal deadline of five days from the date of initiation ex officio, i.e. receiving a report, **processed and decided in 50 cases against public officials and 35 proceedings against political entities.**

In the process of determining the violation of the Law, respecting the short deadline, but also the basic procedural principles, the Agency invited 29 public officials to make an oral or written statement on the facts that are important for the decision-making.

A certain number of applications, whose applicants are active in the fight against corruption and are well acquainted with the laws according to which the Agency operates, gave the impression that they were aimed only at multiplying reports and not at genuine fight against corruption, because they contained surprisingly inaccurate, vague and legally unfounded allegations. Nevertheless, the Agency, with a conscientious and careful assessment of each evidence individually and all together, and based on the results of the entire procedure, adopted four measures of public disclosure of the recommendation for dismissal, namely for one mayor and one president of municipality, as well as two directors of public companies, and seven warning measures for other public officials, of which: one mayor, one president of municipality and one deputy mayor, three directors of public institutions and one director of the company. After the imposed measures, for one school director, based on the request for initiating misdemeanor proceedings submitted by the Agency, the competent misdemeanor court issued a judgment sentencing a public official to a fine in the amount of RSD 50,000.00.

In 19 cases, the Agency assessed that there were no grounds for deciding on the existence of a violation of the provisions of the Law, of which the applicant was informed in writing.

35 proceedings were initiated against political entities before the Agency for suspicion of violation of the Law in relation to the election campaign and 5 warning measures were imposed.

During the election campaign, the Agency also warned the participants of the election process through the media about unauthorized forms of campaigns and in this regard made a statement regarding the management of campaigns on the Internet, distribution of humanitarian aid packages

as an illegal form of political promotion, the amount of allowed contributions to political entities and other topics.

For the purpose of controlling election campaign costs, the Agency organized training for observers and hired 120 observers who supervised the promotional and election activities of political entities.

7.

SUPERVISORY ROLE OF THE BOARD

Until September 1, 2020, or until the starting date of application of the Law on Prevention of Corruption, the members of the Board, elected under the Law on the Anti-Corruption Agency, continued to perform these functions. In order to ensure two-tiered decision-making, the Board decided on appeals against decisions of directors and made decisions regarding other legal remedies of officials, took legal positions and made decisions on legal issues.

Between sessions, members of the Board, analyzed cases in which they are rapporteurs and worked with advisers on drafting decisions.

Regarding complex legal issues, and in order to take legal positions, they studied the regulations regulating a particular disputed legal issue. The supervisory role of the Board was also achieved by reviewing the written monthly reports prepared and submitted by the Director to the Board, as well as by orally reporting to the Director on the work of the Agency at the sessions of the Board. The members of the Board participated in the creation of the Agency's policy, cooperated with the Director and took an active part in the implementation of certain activities of the Agency in the exercise of its competence.

The Board adopted the Agency's 2019 Report and gave a positive opinion to the Agency's Director on the new Rulebook on Internal Job Planning and Systematization in the Anti-Corruption Agency.

Until September 1, 2020, at its sessions, the Board resolved appeals in 82 cases.

During 2020, the Administrative Court submitted a response to 33 lawsuits filed for annulment of the Board's decisions adopted in the appeal procedure (of which 20 were lawsuits for annulment of the Board's decisions adopted in 2020, and 13 lawsuits for annulment of the Board's decisions adopted in 2019). 63 administrative disputes are pending over the public officials' appeals filed and submitted to the Board in previous years.

During 2020, the Administrative Court submitted 27 decisions (26 judgments and one decision). 23 lawsuits were rejected, three lawsuits were accepted, and one proceeding was suspended by a decision of the Administrative Court due to the prosecutor's dismissal of the lawsuit.

In the reporting period, the Board had seven members because after the expiry of the term of office, two members of the Committee, elected at the proposal of the Serbian Bar Association and the Government of the Republic of Serbia, new members were not elected.

1. Danica Marinković, President, Judge of the Court of Appeal in Kragujevac, retired, elected on the proposal of the Administrative Board of the National Assembly;
2. Assistant professor Miloš Stanković, Deputy President, Assistant Professor at the Faculty of Law, University of Belgrade, elected at the proposal of the President of the Republic;
3. Slobodan Gazivoda, member, judge of the Supreme Court of Serbia, retired, elected on the proposal of the Supreme Court of Cassation;
4. Ivan Kovačević, MSc, member, General Director of the Business System "Đuro Salaj" a.d., elected at the proposal of the Social and Economic Council;

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5. Assistant professor Jelena Stanković, member, Assistant Professor at the Faculty of Economics, University of Nis, elected at the proposal of the State Audit Institution;
 6. Janko Lazarević, member, judge of the Supreme Court, retired, elected on the proposal of the Ombudsman;
 7. Živojin Rakočević, MSc, member, writer and journalist, elected at the proposal of the Association of Journalists of Serbia and the Independent Association of Journalists of Serbia.

8.

SUPPORT TO PUBLIC AUTHORITIES AND EMPLOYEES IN THE PUBLIC SECTOR

Key results

- **42 integrity plan models were developed** for all types of institutions, which are bound by the Law on Prevention of Corruption to develop plans, as well as the Instructions for development and implementation of integrity plans for the third cycle of its development.
- **A Methodology for General and Institutional Analysis of Corruption Risks has been developed.** The Training Program in the Area of Prevention of Corruption and Integrity Strengthening was developed, as well as the Instructions for Implementation of Training Programmes in the Area of Prevention of Corruption and Integrity Strengthening, and the Guide for their Implementation.

Other results within the area of competence

The Agency supports public authorities in the development of analyses, models of internal rules, procedures, methodologies, as well as strategic and operational documents with the aim of prevention of corruption and strengthening the institutional integrity and integrity of managers and employees. All activities and results achieved in 2020 were planned in the context of one of the Agency's most important strategic objectives related to strengthening integrity in the public sector.

During 2020, the Agency continued its work on developing a system of support to institutions in the public sector (at all levels of government) for the development of integrity plans, i.e. it provided support for self-assessment which includes the identification, analysis and definition of measures for the management of corruption risks. Based on lessons learned from the previous cycles, within the reporting period the Agency developed 42 integrity plan models for all types of institutions bound by the Law on Prevention of Corruption to develop such plans. These models include 107 risky processes with questions for existing measures, questions for practical implementation and the proposal of measures to reduce the risks in a given process (necessary for the third cycle of preparation and implementation of the integrity plan) for the following systems: political system, judicial system, police system, local self-government system, defense system, public finance and economy system, social policy system, health care system, education system, culture and sport system. Instructions for the development and implementation of integrity plans¹⁵ were also developed, defining the manner of development and closer content of the integrity plan, deadlines for the adoption and implementation of the integrity plan, deadlines for the submission of reports on the implementation of the integrity plan to the Anti-Corruption Agency and the manner of exercising supervision over the adoption and implementation of integrity plans. With expert assistance provided through the project

„Prevention and Combat Against Corruption“ IPA 2013 Service Contract, an analysis of the existing software for the development and monitoring of integrity plans was carried out and a specification for the tender was made, with elements for the development of new segments and functions of the application for the development and monitoring of the implementation of integrity plans.

¹⁵ Official Gazette of RS No.145/20

Understanding the importance of organizational culture as a key factor in the internal environment of each institution, during the reporting period the Agency developed the Methodology for General and Institutional Analysis of Corruption Risks. The methodology contains the elements necessary for the implementation of this analysis, including the table of risk factors, indicators of factors, means of verification and possible risks, and should be an effective mechanism for analyzing how the exercise of authority at the highest levels of management affects the organizational culture of the entire system, i.e. whether the processes and behaviors of people (predominantly in high management spheres) are based on certain written standards. The methodology was preceded by analysis of documents and comparative practices in this area in Australia and South Korea.

Personal integrity is a key prerequisite for improving the integrity of public sector institutions.

With this in mind, the Agency continuously works to provide support to employees in the public sector to strengthen personal integrity and strike a balance between compliance with the rules and action in accordance with the values, as well as to identify, analyze and manage the risks of corruption.

During 2020, the Agency developed a special **Program of Professional Training of Public Sector Employees in the Field of Corruption Prevention for 2020, which contains four thematic units, three of which are within the competence of the sector: Integrity Plan as a Mechanism** for Corruption Prevention; Ethics and Integrity in Public Administration; Training for Trainers in Ethics and Integrity in Public Administration. The National Academy of Public Administration has included this program in the Central Record of Vocational Training Programmes in Public Administration. In addition to the mentioned thematic units, a training entitled: Obligations of public officials under the Law on the Anti-Corruption Agency and the Law on Lobbying was also entered in the records.

The Law on Prevention of Corruption establishes the obligation of public authorities to conduct **training of employees and managers** in accordance with the Agency's training program and instruction and to report in writing to the Agency on the implementation of the training. The misdemeanor liability of the head of public authorities is also prescribed if the public authority does not conduct training of employees and managers, in accordance with the training program and training instructions and if it fails to report in writing to the Agency on the implementation of the training. Also, the Law stipulates that the Agency professionally trains persons who will conduct training in the field of prevention of corruption and integrity strengthening in public authorities. Introducing the obligation to conduct training in the field of prevention of corruption and strengthening of integrity called "Ethics and Integrity" is a major step forward towards the creation and improvement of professional standards of conduct of employees in public authorities. In the context of establishing the conditions for full implementation of the law, the Training Program in the Area of Prevention of Corruption and Integrity Strengthening was developed, as well as the Instructions for Implementation of Training Programs in the Area of Prevention of Corruption and Integrity Strengthening and the guide for their implementation. The Instructions and accompanying documents contain information about the training program, methods of implementation, proper record keeping, as well as instructions on the criteria and manner of appointing public authority employees to be trained for such training implementation. The preparation of the aforementioned acts was preceded by a detailed analysis of documents from comparative practices, analysis of evaluation reports on previous training sessions, expert consultations and cooperation with other sectors, primarily the Legal Sector. In addition, a Guidelines for the Implementation of the Program

and Training Instructions have been drawn up to explain in more detail all elements that may cause doubts or additional questions during the implementation, and to give instructions and advice for the execution of the program. In order to keep up-to-date records of the aforementioned trainings, an analysis was performed on the elements for the preparation of a training reporting application containing all the elements necessary for software development, on the basis of which a technical specification for software development and the software itself will be further developed. During 2020, 127 participants attended a distance learning course (online training) on ethics and integrity in the public sector, 46 of whom successfully passed the knowledge test and received a certificate. In particular, the advantage of organizing and conducting online training has gained importance due to the newly emerging epidemiological situation, but also because it eliminates the costs of organizing and conducting the training, so this educational modality is maximally economical for public sector institutions. At the international online conference "Activities and Cooperation of the Anti-Corruption Bodies in Global New Conditions", held on December 9, the International Anti-Corruption Day, within the panel "New Circumstances as an Opportunity to Strengthen Integrity", participants were presented with online training on ethics and integrity.

By recognizing the importance of fighting corruption at the local level and the necessity of supporting local self-government units and strengthening their capacity to effectively manage corruption risks and other irregularities, in 2020, the Agency continued to collect data from local self-government units (LSGUs) on a quarterly basis on the development of LAPs and the formation of bodies for their monitoring, and the Agency also continued to provide appropriate instructions in this given area. When it comes to the formation of bodies for monitoring the implementation of LAP, seven LSGUs reported to the Agency during 2020 that they formed bodies, two of which were made in accordance with the Agency's Model before the start of the coronavirus pandemic and the call for elections. Considering the above data, it is evident that this year the work of city and municipal administrations was slowed down, which consequently also reflected the process of developing and adopting LAPs and forming working bodies for their monitoring. At the end of the last quarter of 2020, 22 LSGUs adopted LAPs and formed bodies to monitor their implementation mainly in accordance with the Agency's Model, thus fulfilling their obligation under the Action Plan for Chapter 23 within the deadline.

In 2020, the Agency made its contribution to the complex process of drafting an Operational Plan for the Prevention of Corruption in Areas of Special Risk, which is also an obligation under the Action Plan for Chapter 23, by working together with a consultant (hired with the help of the IPA 2013 project "Prevention and Combat Against Corruption") to develop a Methodology for the Impact Assessment of Measures Taken to Reduce Corruption in Vulnerable Areas (health care, taxes, customs, education, local self-government, privatization, public procurement and police).

Prevention is the first and most important step to successfully counter the problem of corruption, because it strengthens and protects the integrity of the public sector and thus contributes to increasing public trust in the work of institutions and has a long-term effect on reducing corruption in the society. By educating, developing awareness and strengthening the knowledge of public sector employees about the risks of corruption and its effects, we develop their capacities and abilities to resist corruption. Therefore, the Agency supports public authorities in the development and implementation of various tools and mechanisms to prevent corruption and strengthen the personal integrity of public sector managers and employees.

9.

INTERNATIONAL COOPERATION

Key results

- In accordance with the Law on Prevention of Corruption, preconditions for the implementation of the new competence of the Agency related to **the supervision of the implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Combat Against Corruption** and Development of the first Report on the implementation of this document have been established; the **Instruction on the Method of Reporting on the Implementation of Strategic Documents** was created ("Official Gazette of RS", no. 145/20) and **Guidelines for Reporting on the Implementation and Performance of the Supervision of the Implementation of the Revised Action Plan for Chapter 23 – Sub-Chapter: Combat Against Corruption**¹⁶, supported by the project "Prevention and Combat Against Corruption" (IPA 2013);
- The Agency was elected **president of the Network of Anti-Corruption Institutions (NCPA)**, which brings together 30 members from Europe and the world, with one observer and four partner institutions. The agency was among its founders, at the invitation of Italy's National Anti-Corruption Agency, and was one of its vice presidents for two consecutive years before being elected president.

Other results within the area of competence

Within *the NCPA*, in 2020, the Agency was involved in projects related to the perception of corruption and the analysis of anti-corruption institutions at the global level (completed), as well as in projects related to the role of the media in the fight against corruption, the mandate of anti-corruption institutions, supervision over the implementation of strategic documents in the field of prevention and fight against corruption and the reporting of assets and incomes of public officials.

As part of **the Council of Europe's Fourth Round Evaluation of the Group of States Against Corruption (GRECO)**, which includes the prevention of corruption among the MPs, judges and prosecutors, the Agency, whose director is the Head of Delegation, has contributed to the joint efforts of relevant state institutions with the aim of harmonizing with international standards in these areas. Compared to the previous Transitional Report, adopted in March 2019, the Second Compliance Report, adopted in October 2020, contains three enhanced recommendations, which directly concern the competence of the Agency. The recommendation relating to the Lobbying Act, has been upgraded from partially fulfilled to fulfilled; the recommendation relating to the Law on Prevention of Corruption, has been upgraded from unfulfilled to partially fulfilled, and the recommendation relating to strengthening the role of the Agency, has been upgraded from unfulfilled to fulfilled.

In the previous year, the **Fifth Evaluation Round of GRECO** began, which relates to the prevention of corruption and the improvement of integrity in the central state administration bodies – the highest executive function and law enforcement agencies, for which the Agency, in coordination with the Ministry of Justice, prepared, in the first phase of the evaluation, the answers

¹⁶ See: www.acas.rs/wp-content/uploads/2020/12/Smernice_za_reporting_ACAS_cir_final.pdf

to the Questionnaire. Representatives of the Agency, during the past year, participated in all plenary sessions of *GRECO*, as part of the Serbian Delegation.

The **Second Evaluation Round of Implementation of the UN Convention against Corruption (UNCAC)** for Chapter II UNCAC – Prevention of Corruption Measures and Chapter V *UNCAC* – Return of Assets to Serbia, supervised by the Netherlands and Latvia, has also begun. The Agency has also prepared comprehensive answers to the self-assessment questionnaire, in the first phase of the evaluation, and the process is being coordinated by the Ministry of Justice. Over the past year, representatives of the Agency also participated in the evaluation of the implementation of *the UNCAC* for Armenia, which Serbia supervises together with the Dominican Republic.

Within the **annual reporting cycle on the implementation of UNCAC**, the Agency has in the past year drafted an appendix on improving the effectiveness of anti-corruption bodies (Art. 6, paragraph 1 and 2 *UNCAC*), in cooperation with the Ministry of Justice and the Ministry of the Interior. Representatives of the Agency also participated in the 11th session of the Intergovernmental Working Group on Corruption Prevention of the UN Office for Drugs and Crime (*UNODC*), which reviewed the effectiveness of anti-corruption institutions, in line with *UNCAC*.

As the national coordinator of the **Anti-Corruption Network of the Organization for Economic Cooperation and Development (ACN/OECD)**, in cooperation with the relevant national actors, the Agency worked on the implementation of activities related to the meeting of the working bodies of this initiative and the preparation of the annual activity report; indicators for monitoring the activities of *ACN/OECD* members; the preparation of the report on anti-corruption reforms in Eastern Europe and Central Asia for the period 2016-2019; the implementation of the Istanbul Anti-Corruption Action Plan¹⁷; improving integrity in the private sector; the preparation of a thematic study on the incrimination of corruption, and the Ministry of Finance approved the annual allocation for the work of this initiative. **Within the OECD**, the Agency was involved in the preparation of the Report on Competitiveness of Southeast Europe 2021, as well as in the Multidimensional Review of Serbia, in the field of prevention of corruption.

In addition to improving the already existing cooperation with a number of institutions for preventing and combating corruption **at bilateral level**, in 2020 the Agency established communication and cooperation with new anti-corruption institutions from Bulgaria, Albania, Ecuador, Kazakhstan, Uzbekistan and Tunisia.

A **Memorandum of Cooperation with the Commission for Fight against Corruption and Confiscation of Illegally Acquired Property of Bulgaria** was also concluded, aimed at improving efficiency in preventing and combating corruption through the exchange of experience, good practices, information, as well as technical assistance.

¹⁷ Istanbul's Anti-Corruption Action Plan is a collegial monitoring program that has been operating under the ACN/OECD since 2003. It focuses on anti-corruption reforms through the evaluation of states and oversight of the implementation of recommendations, which promote the standards envisaged by the UN Anti-Corruption Convention and other international instruments and examples of good practice.

When it comes to **the European integration process**, the Agency, in accordance with its competences, participates in all activities within the framework of Serbia's EU membership negotiations. During the past year, the Agency presented the results of the work through reporting on the implementation of the Action Plan for Chapter 23 and then the Revised Action Plan for Chapter 23. In order to establish a system for monitoring the results and cases falling within the scope of the Agency's work, **reports on the implementation of the transitional criteria for Chapter 23** in the field of conflicts of interest, reporting and checking the assets and revenues of officials, especially judges and prosecutors, as well as the control of the financing of political activities, in cooperation with the Republic Public Prosecutor's Office and misdemeanor courts, were submitted on a semi-annual basis. The Agency also continued to report on the results and challenges in the work and for **the purpose of drafting the annual report of the European Commission on Serbia's progress** in reforms, namely in the areas of political criteria, fight against corruption, judiciary and public administration reform; **on the implementation of the Stabilization and Association Agreement (SAA)** through the implementation body – the SAA Committee, the Subcommittee on Justice, Freedom and Security and the Special Group for Public Administration Reform, as well as on the implementation of the **National Program for the Adoption of the EU Acquis (NPAA)**. In 2020, in addition to the aforementioned SAA implementation bodies, the Agency also prepared an appendix for the Subcommittee on Economic and Financial Affairs and Statistics.

The implementation of the annual Operational Plan **of the Strategic Plan for the period 2019-2023**, drawn up by the Agency with the support of *the USAID* Responsible Authority Project, was also monitored and, based on the results and lessons learned from the previous period, the Agency initiated the preparation of the annual Operational Plan for 2021.

Dynamic activities of presenting the work and results of the Agency in international contexts are also noticeable. The number of institutions contacting the Agency to establish cooperation and exchange experience has increased, as well as invitations to representatives of the Agency to present examples of good practice at international conferences and trainings. Among the most significant events in the past year was the participation in the closing meeting on 28 *TOSCE* Economic and Environmental Forum on Preventing and Combating Corruption through Innovation, Increased Transparency and Digitization, as well as two preparatory meetings under the Albanian *OSCE* Presidency. The Agency's experiences were also presented at international conferences and webinars organized by *ACN/OECD*, as well as anti-corruption bodies from Palestine, Kazakhstan, France, etc.

Continuous support of the international community to the Agency through various projects and initiatives has continued, with the aim of systematically strengthening the professional and technical capacities of the Agency. Although in 2019, the Agency was, directly or indirectly, involved in the most projects since its establishment, in 2020 it recorded even greater success in this domain, bearing in mind the increased number of international partners who supported the implementation of the Agency's competences.

Improving cooperation with misdemeanor courts and prosecutors' offices, drafting the Instructions on the Procedure for Concluding Agreements on the Confession of Misdemeanors, strengthening analytical and research capacities, drafting the Methodology for the Analysis of Reports on the

Property and Incomes of Public Officials in the Verification Procedure with accompanying trainings, as well as drafting the Manual for Recognition and Management of Conflicts of Interest and Incompatibility of Functions, are some of the activities supported through *the USAID Government Accountability Project*.

Management of Conflicts of Interest and Incompatibility of Functions are some of the activities supported through *the USAID Government Accountability Project*.

The **OSCE Mission in Serbia** has provided significant support to the Agency in terms of, inter alia, drafting the Methodology for Corruption Risk Analysis in Regulations and appropriate basic and advanced training, providing software licenses and improving technical capacities, strengthening the skills of employees, as well as organizing an international conference on 9. December, International Anti-Corruption Day.

Within **the Services Contract "Prevention and Combat against Corruption"**, financed by the EU from the IPA 2013 program, Guidelines for Reporting on the Implementation and Performance of the Supervision of the Implementation of the Revised Action Plan for Chapter 23 – sub-chapter Combat against Corruption, as well as the Draft Methodology for assessing the impact of measures taken with the aim of reducing corruption in risk areas (health care, taxes, customs, education, local self-government, privatization, public procurement and police), webinars were held for representatives of local self-governments related to the new points in the Law on Prevention of Corruption, as well as training for employees of the Agency on the topic of data collection and analysis.

The Agency also received extremely significant support from the **Ministry of Justice of the USA**, in the form of donation of equipment and strengthening of technical capacities.

Cooperation with the **International Foundation for Electoral Systems (IFES)** continued through activities aimed at strengthening the capacities of employees in the field of controlling the financing of political activities, as well as the development of a guide in this domain.

Support through **the World Bank Initiative for the Improvement of Transparency and Accountability in Serbia** is reflected in the activities of drafting the Model Code of Conduct for Public Officials with guidelines for its implementation, as well as establishing practices and drafting procedures, which will ensure that the Agency regularly publishes data on how public authorities implement its recommendations.

In the previous year, the Agency was also involved in **the Council of Europe's** project "Prevention of Money Laundering and Financing of Terrorism in Serbia", with the support of the Swedish International Development Agency (*SIDA*), as well as in **the Regional Program "Southeast Europe – Together Against Corruption"** of the Regional Anti-Corruption Initiative (*RAI*) and *UNODC* with the support of the Austrian Development Agency (*ADA*).

Dedicated to **involving young** people and strengthening their awareness of the causes and seriousness of corruption, the Agency has enabled young people to acquire knowledge and insights into the competencies and mechanisms of prevention of corruption that it applies, through a successful internship program for young professionals from southwestern Serbia in 2019,

organized by the *OSCE* Mission in Serbia and the Mission of the USA at the *OSCE*, as well as by facilitating selected interns in 2020.

When it comes to **the programming of international assistance funds**, the Agency continuously participates in the work of the sectorial working groups for programming and coordination of IPA funds and other development assistance for the justice, interior and public administration reform sectors, as well as the drafting of supporting documents. In the past year, it contributed to the relevant sectorial working groups for IPA III programming (*IPA 2021/2022*), as well as to the process related to contracting and implementation of *the Flexible Facility* project (IPA 2019), in cooperation with the Ministry of European Integration and the Ministry of Justice. The Agency also participated in the international independent evaluation of the use of EU funds and cooperation between Serbia and the EU for the period 2012-2018, as well as in the independent evaluation of *the USAID* Government Accountability Initiative. In 2020, the Agency also actively contributed to the work of the Network for the Suppression of Irregularities and Fraud in the Treatment of EU Funds of the Ministry of Finance.

10.

INTER-INSTITUTIONAL COOPERATION AND CITIZEN PARTICIPATION IN THE PREVENTION OF CORRUPTION

Cooperation with other state bodies

Bearing in mind the importance of fighting corruption, state authorities are strengthening their cooperation with each other on a daily basis and are making joint efforts in the area of data exchange and processing and coordinated activities. The result of this cooperation is improving efficiency in preventing and combating corruption and organized crime.

In carrying out activities within its competence, the Agency develops cooperation with the Ministry of Justice, the Ministry of the Interior, the Ministry of Finance – Tax Administration, the Customs Administration and the Administration for the Prevention of Money Laundering. It also carries out significant activities with the Republic Public Prosecutor's Office, Prosecutor's Office for Organized Crime and Office of the Council for National Security and Protection of Classified Information. These bodies are also signatories to the agreement on the establishment of the National Criminal Intelligence System NCIS, in accordance with the Action Plan for Chapter 24 within the framework of the accession negotiations of the Republic of Serbia for membership in the European Union.

During the reporting period, the Agency intensified cooperation with misdemeanor courts, which was mainly related to the drafting and adoption of the Instructions on the Procedure for Concluding Agreements on Confession of Misdemeanors in the Agency, in accordance with the Law on Prevention of Corruption. Cooperation continued with other independent state bodies – Ombudsman, Commissioner for Information of Public Importance and Protection of Personal Data, State Audit Institution and Commissioner for Protection of Equality.

During the reporting period, the Agency issued two opinions on the assessment of corruption risks in the proposals and drafts of regulations. Ministry of Justice and the Ministry of Finance submitted one request for Agency's opinion each.

Given the significantly lower number of requests compared to previous years, the epidemiological situation caused by the COVID-19 virus and the beginning of the application of the Law on Prevention of Corruption, which for the first time explicitly prescribes the Agency's competence in the field of corruption risk assessment in regulations, the Agency used 2020 to prepare a **new Methodology on Corruption Risk Assessment** in regulations in cooperation with the OSCE.

Cooperation with civil society and the media

Key result

- **Established a permanent and encouraging partnership** through financial and advisory support to the civil society, consultative meetings, and joint activities, exchange of views and supervision of project implementation.

Other results within the area of competence

The Agency is continuously committed to an important strategic goal – increasing the level of participation of society in the prevention of corruption. The Agency included representatives of civil society organizations as speakers at the international online conference "*Activities and Cooperation of the Anti-Corruption Bodies in New Global Conditions*", dedicated to the International Anti-Corruption Day.

Cooperation with the civil sector also took place through the allocation of funds to projects aimed at developing the anti-corruption culture. Within the **11th Competition** announced in the reporting period, the Agency allocated funds in the amount of **up to RSD 1,440,000.00** to a project that meets the Competition goal – Supported development and strengthening of the integrity, public accountability and transparency of the work of public authorities with the aim of improving the fight against corruption. Transparent advertising of the Competition on the Agency's website, E-Government Portal and E-Calendar of the Office for Cooperation with Civil Society of the Government of the Republic of Serbia was also strengthened by promotion through cooperation with Citizens' Initiatives and through the Agency's profile on social networks. Seven project proposals were submitted within the Competition deadline, one of which was rejected due to formal deficiencies, while for the remaining six, the Competition Commission conducted the evaluation and ranking procedure. A list of evaluations and rankings has been established, according to which the project "**Towards more transparency and accountability in the decision-making processes**" of the Becej Youth Association (BUM) was the best ranked. The project is ongoing, with active monitoring by the Agency.

Cooperation with this association has contributed to focusing **the public's attention on the importance of fighting corruption at the local level**. The campaign accompanying the project contributes to the supervision of the work of local self-government by the citizens themselves, who are actively involved in the preparation of the budget and other municipal documents, which contributes to a high valuation of the transparency of the work of this local self-government.

The Agency is making significant efforts to **foster partnerships with the media**, as objective media coverage is an incentive for its more efficient and effective operation. The Agency continuously works to raise public awareness regarding the proper understanding of its legal competences, which are purely of preventive nature.

It closely monitors investigative journalism on corruption cases in Serbia, and acts within its competence in each specific case. The Agency also regularly answers journalists' questions, of which there were 87 during the reporting period. The issues mainly concerned the declaration of property and income of public officials and potential conflicts of interest.

The main channel of communication with the public is the website <http://www.acas.rs> through which 86 press releases were issued during the reporting period. By the Agency's presence on social networks, where its parties have a large number of followers, enabled real-time contact with the Agency.

During the reporting period, the Agency held a workshop with representatives of civil society organizations and journalists, aimed at acquainting them with the most important new aspects of the newly stipulated Law.

Acting on citizens' petitions

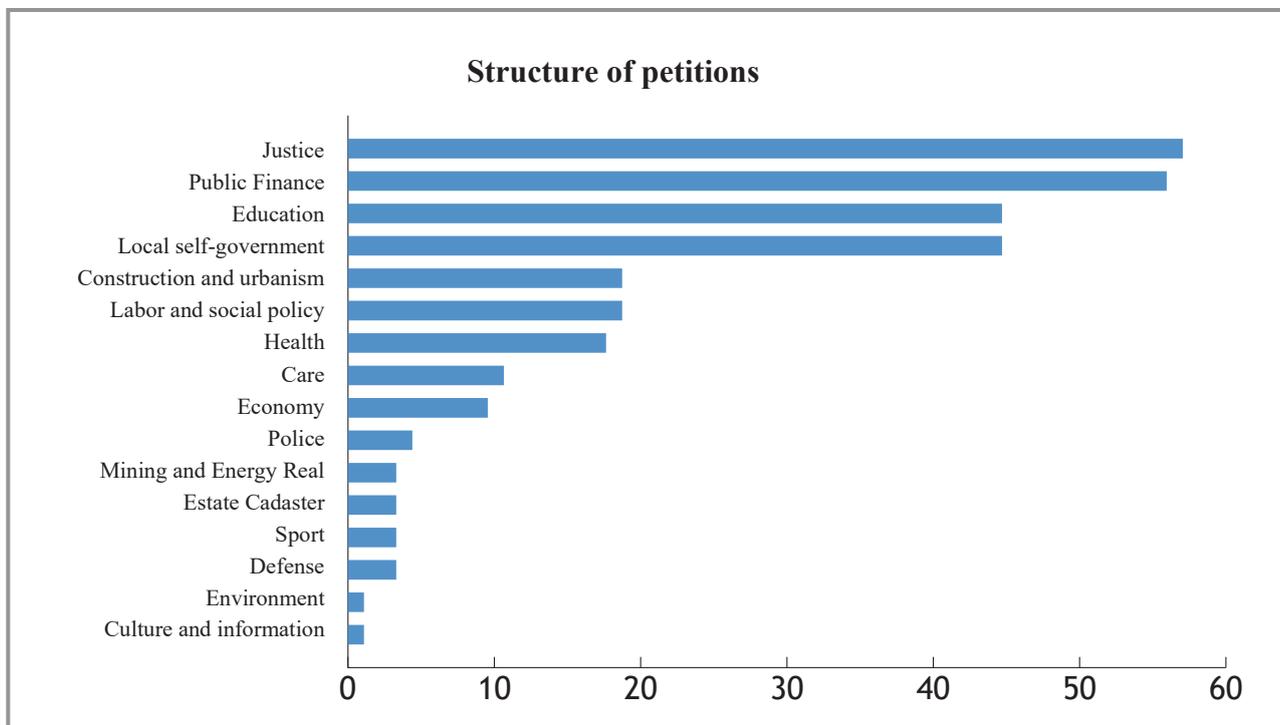
Key results

- The proceedings in **468 cases** from the reporting period and previous years were completed.

Other results within the area of competence

During 2020, 320 cases were formed on petitions from natural and legal persons, and proceedings in 468 cases from the reporting period and previous years were completed.

Structure of new petitions registered in the reporting period is as follows: 58 in the field of justice, 57 in the field of public finances, 46 in the field of education, 46 in the field of local self-government, 19 in the field of construction and urbanism, 19 in the field of labor and social policy, 18 in the field of health, 11 in the field of economy, 10 in the field of police, 4 in the field of mining and energy, 3 in the field of real estate cadaster, 3 in the field of sports, 3 in the field of defense, 3 in the field of environment, 1 in the field of culture and information/media, 1 in the field of enforcement, as well as 18 petitions assessed as irregular, i.e. on which the Agency is not competent to act.



In the reporting period, the Agency sent **326 official notes to public authorities**, in the largest number to competent inspections for the purpose of supervising and informing the Agency about the findings established with the controlled entity, while in certain cases, in order to determine the merits of the submitted petition, the Agency addressed directly the reported public authorities for the purpose of collecting documentation and recording statements.

The Agency most often contacted the Education, Budget, Health and Administrative Inspection, Tax Administration, Labor Inspectorate, Public Procurement Office, Ombudsman, Chamber of Executors, State Attorney's Office, Restitution Agency, Department of Internal Control of the Ministry of Interior, as well as competent inspections in local self-government units.

In 73 cases, the Agency addressed the competent prosecution offices by submitting the petition in question for further competence and procedure or by requesting information on the outcome of the prosecution procedure based on the petitions submitted by the Agency in the previous period. The Agency sent 46 official notes to the Special Anti-Corruption Departments of the Higher Public Prosecutors' Offices, and six official notes to the Prosecutor's Office for Organized Crime.

Given the preventive role that the Agency generally plays within its competences, the Agency's handling of petitions is characterized by indicating to public authorities the irregularities that create opportunities for corruption in the public sector. The provisions of the Law stipulate that if the facts and evidence that gives rise to suspicion of irregularities in the work of the public authority have been established during the application procedure, the Agency shall submit a comprehensive proposal for supervision to the body supervising the work of the public authority against which the petition was filed. Also, if the Agency, in acting on the petition, estimates that there are circumstances in the work of public authorities that may lead to corruption, it shall make recommendations to the public authority with measures to remedy the situation, with a deadline for their implementation. The Law introduced a significant change being that from September 1, 2020, under certain conditions, the **Agency may also act on anonymous applications.**

Access to information of public importance

Key results

- **Out of the total number** of requests for information, the Agency **acted on 98.33% of them.**

Other results within the area of competence

The Agency received 188 requests for access to information of public importance in the reporting period. Most requests were made by media representatives (120), and the Agency acted on the largest number of requests by submitting the requested information (118), while two requests were rejected. The highest number of requests concerned the provision of data regarding the assets of public officials (63) and regarding the budget (14).

Out of the total number of requests, citizens made 38, and the Agency acted on the largest number of requests by submitting the requested information (36), i.e. acted on 94.73% of these requests, while one request was rejected.

During 2020, in 27 cases the civil society organizations submitted a request to the Agency for the submission of information of public importance, and the Agency acted on the largest number of requests by submitting the requested information (25), i.e. acting on 92.30% of these requests, and with one request the procedure is ongoing, while another one was rejected. In the reporting period, one request was made by an institution of public authority, two requests were made by other applicants, and the Agency acted on all three requests by submitting the requested information. During the reporting period, the dissatisfied parties submitted eight complaints to the Commissioner: one against the Agency's decision to reject their request and seven complaints for not providing all of the requested information.

11.

RESEARCH OF CORRUPTION

Key results

- **12 surveys and analyses in the field of corruption were conducted**, the results of which serve to increase the effectiveness of the Agency's work.

Other results within the area of competence

Research of corruption is an active process of studying a certain phenomenon to detect, interpret and clarify facts, with the analysis of the collected data conducted in the phase of identification and interpretation of the collected data, which can be combined with the aim of examining the causes that led to corrupt behavior.

The Law stipulates that the Agency regularly researches the state of corruption, analyses the risks of corruption and prepares reports with recommendations to eliminate such risks.

Based on the conducted research and analyses on issues related to the state of corruption in the Republic of Serbia, the Agency prepares reports that contribute to an objective presentation of the state in the area of corruption to the public, as well as the presentation of the role and activities of the Agency aimed at the suppression of corruption.

At the same time, the results of the research and analyses carried out by the Agency can be a corrective factor for the government sector and a quality indicator of how effective their work is in the field of prevention and fight against corruption.

Each individual research provides information on the methodology used and contains a certain theoretical explanation of the concepts in the field of corruption, which makes it significantly easier for the ordinary reader to view the problem of corruption as a negative social phenomenon, as well as understand the results and conclusions derived from the analyses of the obtained data..

When selecting the topics for research and analyses to be conducted by the Agency during 2020, we chose the topics in the field of corruption that were not addressed in the previous years and which could be useful in increasing the effectiveness of the Agency's work.

During 2020, the Research and Analytics Department conducted, inter alia, the following analyses and research:

- **Research into the financing of anti-corruption institutions in the region in 2018 and 2019**

This research covers anti-corruption institutions in Northern Macedonia, Montenegro, Croatia and Serbia. The subject of the research were the methodologies of the budgeting process, the amount, structure and implementation of budget funds in the observed period, as well as the specifics in the field of financing of each of the institutions concerned individually.

The general conclusion of the conducted research is that each of the anti-corruption institutions could improve some of the aforementioned funding elements in the future. Some of the essential characteristics are that:

- Montenegrin, Macedonian and Croatian anti-corruption institutions apply Insufficiently developed programming budgeting methodologies;
- Macedonia's anti-corruption institution has had underdeveloped budgets in the period under review.

- **Research and analysis of the incompatibility of functions in several countries of the European Union**

The subject of the research and analysis is the constitutional regulation of incompatibility of functions in state bodies in certain countries of the European Union and their incompatibility with the function of deputies in the European Parliament. The research covered the following countries: Belgium, Bulgaria, Czech Republic, Denmark, Germany, Estonia, Ireland, Greece, Spain, France, Croatia, Italy, Cyprus, Latvia, Lithuania, Luxembourg, Hungary, Malta, the Netherlands, Austria, Poland, Portugal, Romania, Slovenia, Slovakia, Finland, Sweden and the United Kingdom. Within these states, functions in the legislative, executive and judicial branches of government were observed. The targeted positions were: member of the national parliament, head of state, member of the government, judicial posts and constitutional court judge. The comparative method of research was applied.

All observed EU members are countries where the system of "checks and balances" is represented. Among them, the largest number of countries are with the republican type of government, while two countries are monarchies (Belgium and Spain). Some of the countries are federal (Belgium, Germany), others are unitary with different forms of territorial autonomy (Italy, Spain), while others are purely unitary (Bulgaria, Croatia, Slovenia, etc.).

The research grouped three ways of constitutionally regulating the incompatibility of these functions. The first group includes countries with comprehensive and detailed constitutional regulation of incompatibilities of functions (e.g. Spain and Slovakia, as well as Greece, in which, in addition to incompatibility, ineligibility is regulated in detail – the inability of certain categories of officials to stand for parliamentary office). The second group of observed countries are the countries where the incompatibility of functions is constitutionally regulated with a call for detailed regulation by organic laws or ordinary laws (e.g. France). In the third group of countries (e.g. Czech Republic, Portugal) there is no constitutional regulation of incompatibility of functions.

The incompatibility of the function of a member of the European Parliament is governed by the conditions laid down in Article 12. of the 1976 Act on the election of members of the European Parliament in direct elections.

The research found that in all observed countries, the rule that the exercise of public functions in national systems is incompatible with the function of a member of the European Parliament, although there were previously exceptions (e.g. the possibility of simultaneously performing a post

as a member of the European Parliament and Member of the Parliament of the United Kingdom (until the 2009 EP elections). This rule is established by Article 7. of the 1976 Act, which establishes a list of functions incompatible with membership in the European Parliament. The list includes, in particular, incompatibility with the function of "member of the government of a Member State" and the "member of the national parliament".

The research found a tendency of further complication of the incompatibility of functions performed at national level with the function of an EP member.

- **Research and analysis of submitting reports on the assets and incomes of public officials, contents and verification of the data from the said reports in the countries of the region**

The subject of the research and analysis were the valid regulations of the countries in the region that regulate the manner and deadlines for submitting the Report on the assets and revenues of public officials, the content of these reports, the public data from the Report, as well as the verification of the data from the Report. This research and analysis cover the applicable regulations in Croatia, Montenegro, Northern Macedonia, Slovenia and Serbia. The most significant conclusions reached by the conducted research and the later prepared analysis are:

- regarding *the manner and deadlines of submission of the Report* – in all analyzed countries, officials have an obligation to report their assets and income (in Northern Macedonia - on assets and interests), and most of these countries define which officials are subject to or are not subject to this obligation. Thus, in Northern Macedonia, Serbia, Croatia and Slovenia, it is determined which officials are subject to this obligation, while Montenegro prescribes that all public officials have this obligation. This obligation refers to the assets and incomes of officials, and in Serbia, Montenegro and Croatia also to the assets and incomes of certain related parties. In Serbia, the law stipulates that certain officials are not obliged to submit a Report, but the Agency may also require them to submit one;
- regarding *the content of the Report and the public character of the data* – In addition to the information on the public official and the function he/she performs, the basic content of the Report consists of data on immovable property owned by the official, movable property exceeding a certain, legally prescribed value and on the incomes he/she generates. In addition, it may also contain data on securities, intellectual property rights, cash in excess of a certain amount etc. The information contained in these reports is generally public, except for information that is, by the law, required not to be disclosed, such as the exact address, the amount of funds in the accounts, and other;
- regarding *the verification of the data from the Report* – In all countries, the competent anti-corruption

authority checks the veracity and completeness of the reported data. The subject of the verification is the data on the assets and incomes of officials, but also of their related parties. This verification is carried out by collecting and comparing data from other legal entities, which are obliged to submit the requested data at the request of the anti-corruption authority within the set deadline. This information can also be requested from the

public official himself/herself. If it is determined that the assets of officials have increased disproportionately in relation to the declared incomes, the anti-corruption authority shall request the officials to

explain and document the increase in assets. If the official fails to prove that assets and incomes have been acquired in accordance with the law, the anti-corruption authority shall inform the other competent authorities thereof, in particular the authority that elected or appointed the official to office. If the anti-corruption authority considers that a criminal offence or misdemeanor is suspected, it shall file an appropriate criminal or misdemeanor report with the competent authority.

- **Statistical analysis of the 2019 gift catalogue**

The analysis gives a statistical presentation of gifts and their comparison to the previous years. The concept of a gift is defined by the Law on the Anti-Corruption Agency and it can be money, an object, a right and a service performed without adequate compensation and any other benefit given to an official or a related person in connection with the performance of the public office. The Law recognizes two types of gifts that an official or a person associated with him/her may receive in connection with the performance of a public office: protocolled (received from international donors) and appropriate gifts (received from domestic donors). Since 2014, the Agency has been developing and publishing *the Statistical Analysis of the Gift Catalogue*, which contains: number of gifts by year, number of gifts by type, ownership of gifts, distribution of gifts by government level, distribution of gifts by ownership regime, function and ownership ratio of the gift, overview of donor countries, list of officials who received gifts, and list of donors.

Some of the specific conclusions of this analysis are:

- when it comes to gifts received in 2019, officials reported 681 gifts received in connection with the performance of public office, which is more than 2018, when they reported 668 gifts;
- in 2020, the trend from 2019 of extremely poor response of public authorities to the call for declaring received gifts to the Agency continued;
- in 2019, officials received more protocolled (505) than appropriate (176) gifts;
- in 2019, fewer gifts were retained by officials in personal ownership (134), while 547 gifts were transferred to public ownership;
- in 2019, the value of gifts received by officials ranged from RSD 0.00 to RSD 1,200,000.

12.

ANNUAL RESULTS

As an authority with a preventive function in the fight against corruption, **in 2020**, the Agency faced numerous cases of violation of the provisions of the Law.

In matters of verifying assets, conflicts of interest, timely submission of regular and additional reports, control of the financing of political activities and other cases in which the Agency has exclusive competence, the **Director of the Agency imposed 412 measures** due to violation of legal provisions.

In deciding on appeals from public officials, the **Agency's Board confirmed 91.46% of the Director's decisions**.

Sincerely committed to building and strengthening the integrity of institutions and those representing them, during the proceedings in 2020, the Agency submitted **286 requests for initiating misdemeanor proceedings** against public officials, political entities, legal entities and responsible persons in the legal entity.

In the course of proceedings, due to the existence of reasonable suspicion of a criminal offence, the Agency also submitted **14 criminal reports to the competent prosecutors' offices**.

13.

RECOMMENDATIONS

- Adopt the Law on Amendments to the Law on Financing of Political Activities so as to prescribe appropriate sanctions for all legally prohibited conduct for which neither misdemeanor nor criminal liability is currently in force;
- Adopt the Law on Amendments to the Law on Political Parties, in order to define the concept of groups of citizens and to regulate all disputed issues arising from that concept;
- Adopt the Law on Amendments to the Law on Lobbying so as to prescribe that the data from the report on the work of lobbyists and notifications on lobbying contacts of lobbied persons, as well as on the records of the authorities, are public;
- Act on the initiative of the Agency for authentic Interpretation of the provision of Art. 46, paragraph 1 of the Law on Prevention of Corruption (Performance of other work or activities), in order to enable its consistent application;
- Consistently and in a timely manner, perform the obligation imposed on authorized proponents of laws in terms of submitting draft laws to the Agency for the purpose of issuing opinions on the assessment of corruption risks in laws in fields of particular risk of corruption;
- When drafting a new anti-corruption strategy paper at the national level, use the findings and recommendations formulated by the Agency in the annual reports on monitoring the implementation of the National Anti-Corruption Strategy and the action plans for its implementation for the period 2013-2018;
- In order to achieve greater success in the implementation of defined activities in the process of European integration, use the findings and recommendations formulated by the Agency in the first Report on the Supervision of the Implementation of the Revised Action Plan for Chapter 23 - Sub-Chapter: Combat Against Corruption;
- Provide organizational and personnel preconditions in public authorities, with the aim of developing and implementing an integrity plan for the next cycle, in accordance with the Law on Prevention of Corruption, as well as the Instructions for the Development and Implementation of Integrity Plans;
- Provide sufficient material and financial resources for regular operation, as well as for the commenced implementation of the new information system of the Agency.

14.

TABULAR VIEW OF SIGNIFICANT DATA

Conflict of interest

Due to violations of the provisions of the Law, **439 procedures** were initiated.

Initiated verifications and procedures for violation of the Law	
Acting on complaints	276
Ex officio	163

Due to violations of the provisions of the Law on the Agency, **179 measures** were imposed.

Type and number of measures imposed by the Agency	
Warning measures	111
Measures of public disclosure of the decision on the violation of the law	33
Termination of the second public office by force of law	18
Measure of public disclosure of a recommendation for dismissal	17

In 2020, a total of **two requests were submitted for initiating misdemeanor proceedings**. The Misdemeanor Court in Belgrade issued a total of **11 decisions** based on requests for initiating misdemeanor proceedings submitted before and during 2020.

Structure of misdemeanor court decisions	
Monetary fines	3
Warnings	3
Acquittals	1
Decision on suspending the procedure	4

Verification of assets and incomes

Due to violations of the provisions of the Law, a total of **57 procedures** were initiated.

Initiated verifications and procedures for violation of the Law	
Untimely submission of reports after entry into public office	15
Untimely submission of reports upon termination of public office	5
Untimely submission of reports on significant changes in assets and incomes during the public office	12
Untimely submission of reports on significant changes in assets and incomes upon termination of public office	3
Cumulative violations of the provisions of the Law	22

Due to violations of the provisions of the Law, **61 measures** were imposed.

Type and number of measures imposed by the Agency	
Warning measures/ Reminders	61

In 2020, a total of **11 requests were submitted for initiating misdemeanor proceedings** for untimely submission of the Report on Assets and Incomes. In 2020, the Misdemeanor Court in Belgrade issued a total of 11 decisions based on requests for initiating misdemeanor proceedings submitted before and during 2020.

Structure of misdemeanor court decisions	
Convictions	3
Decision on suspending the procedure	8

During 2020, **four criminal charges/reports** were filed with the competent prosecutors' offices due to the existence of reasonable doubt that, in order to conceal assets, the public officials failed to provide information or provided false information about their assets to the Agency.

Statistics on the treatment of criminal charges and reports filed in the course of and before 2020	
Sentence rendered - suspended sentence	1
Second instance acquittal	1
Charges filed	1
Conduct of evidentiary actions in progress	16
Criminal charges dismissed, applying the principle of opportunity	3
Criminal charges dismissed	2

Registers and records

Due to violations of the provisions of the Law, **173 procedures** were initiated.

Initiated procedures for violation of the Law	
Due to untimely submission of the Report after the election or appointment to public office	118
Due to untimely submission of the Report upon termination of public office	51
Due to cumulative violations of the provisions of the Law	4

Due to violations of the provisions of the Law, **163 measures** were imposed.

Type and number of measures imposed by the Agency	
Warning measures or reminders	151
Measures of public disclosure of the decision on the violation of the law	9
Measure of public disclosure of a recommendation for dismissal	3

In 2020, a total of **18 requests** were submitted for initiating misdemeanor proceedings. The Misdemeanor Court in Belgrade issued a total of **75 decisions** based on requests for initiating misdemeanor proceedings submitted before and during 2020.

Structure of Misdemeanor Court decisions	
Convictions	49
Decision on suspending the procedure	20
Acquittals	2
Decision on suspending the procedure because there are no conditions for the validity and enforceability of the first instance decision	4

During 2020, **nine criminal charges** were filed with the competent prosecutors' offices due to the existence of reasonable doubt that public officials, in order to conceal assets, did not declare assets to the Agency or provided false information about assets.

Outcomes of the **criminal charges** filed by the Agency with competent prosecutors' offices before and during 2020:

Proceedings of competent prosecutors' offices	
Convictions - paroles	1
Conduct of evidentiary actions in progress	8
Criminal charges dismissed, applying the principle of opportunity	1
Criminal charges dismissed	6

Control of financing of political activities

A total of **89 control procedures** have been initiated within the area of competence.

Number and structure of the inspections of financing of political activities	
Inspection of the Report on Election Campaign Expenses	67
Inspection of Annual Financial Statements	22

Due to violations of the provisions of the Law on Financing of Political Activities, **nine decisions** were issued on the loss of rights.

Number of decisions on loss of rights	
Decision on the loss of the right to financing from public sources – Political Parties	8
Decision on the loss of the right to financing from public sources – Groups of Citizens	1

In 2020, a total of **310 proceedings** were initiated for violations of the law on financing of political activities. Out of the total number of initiated proceedings, **255 requests were submitted for initiating misdemeanor proceedings**, and **55 proceedings** were initiated before the Agency against political entities for violations of the provisions of the Law on Financing of Political Activities.

Structure of grounds for initiating misdemeanor proceedings	
Non-submission of Annual Financial Reports for 2019	63
Non-submission of Annual Financial Reports for 2018	28
Non-submission of Annual Financial Reports for 2017	8
Failure to submit reports on campaign expenses in 2020	144
Failure to submit reports on election campaign expenses in 2018	1
Use of public resources during the election campaign contrary to the Law – Art. 23	4
Non-use of at least 5% of the funds received for regular work on an annual basis for vocational training, international cooperation and cooperation with membership in 2016	1
Exceeding the maximum value of donations in 2018	1
Misuse of funds in 2020	2
Submission of report on election campaign expenses in 2020 that did not contain all the data	1
Failure to open a special account for election campaign financing in 2019	1
Non-refunds of funds acquired contrary to the prohibition prescribed by the law of the AFR 2018	1

One report was filed **with the competent prosecutor's office due to the suspicion that the responsible person in the political entity committed a criminal offence.**

Based on requests for initiating misdemeanor proceedings submitted before 2020, the Misdemeanor Court in Belgrade issued a total of 195 judgments, 101 of which are final.

Structure of Misdemeanor Court decisions	
Monetary fines	84
Warnings	14
Acquittals	3

Proceedings of the second-instance authority on appeals

Decisions of the Board	Number
Rejected appeals	75
Partially annulled first instance decisions	3
First-instance decisions annulled	3
Rejected appeals	1
Total	82

Structure of first instance decisions issued by the Board, acting on appeals	Number
Measure of public disclosure of a recommendation for dismissal from public office	25
Decision determining violation of Art. 28 of the Law on Agency (simultaneously performing several public offices without the approval of the Agency) and termination of public office by force of law	12
Measure of public disclosure of the decision on the violation of the Law on Agency	11
Decision rejecting the request for approval of another public office, rejected as untimely	10
Decision determining violation of the law and imposing a warning measure on the official obliging him/her to act in a certain manner	8
Decision on rejection of requests for approval of another public office	5
Decision on rejection of requests for approval of performing another job apart from the public office	3
Decision on the notification for the official performing another work or activity which was established as a conflict of interest, obliging the official to stop performing that work or activity	2
Decision on rejecting the appeal of the official	2
Decision on rejection of the request for restitution	2
Decision on suspending the procedure	1
Notification of the outcome of the procedure	1
Total	82

Decisions of the Administrative Court	Number
Rejected appeals	23
Accepted appeals	3
Procedure suspended	1
Total	27

Proceedings of the Administrative Court

Public office		First instance decision approved by the Board in the second instance procedure		Decision of the Administrative Court
		Violation of the law was determined/other decision	Measure imposed	
1.	Rector of the University	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
2.	Deputy member of the Republic Electoral Commission	Decision rejecting the request for approval of another public office of the deputy mayor of the city administration		Judgment rejecting the appeal
3.	Municipal Assembly Councilor	Decision determining that the public official did not respect the imposed deadline of the warning measure and did not stop simultaneously performing the public office of a counselor and the duties of a member - president of the council of the local community	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
4.	Director of Healthcare Centre	Decision determining violation of Art. 27, paragraph 2 of the Law on Agency in connection with Art. 130, paragraph 6 of the Law on Healthcare (person related to the official is the owner of a pharmacy)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
5.	Municipal President	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (funds paid from the municipal budget to the foundation whose founder is the official)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
6.	Company Director	Decision determining violation of Art. 27, Art. 32, paragraph 1 and Art. 35 of the Law on Agency (business cooperation with the company owned by the official; non-transfer of management rights in companies)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal

7.	Former Municipal President	Decision determining violation of Art. 43, paragraph 4 and Art. 44, paragraph 1 of the Law on Agency (failure to report data in the asset report and failure to submit additional report on assets and incomes within the prescribed deadline)	Warning to comply with the provisions of the Law on Agency in the future	Judgment rejecting the appeal
8.	Municipal Assembly Councilor	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (simultaneously performing the public office of a counselor and the duties of a member – president of the council of the local community)	Warning measure to stop simultaneously performing public office and other duties	Judgment rejecting the appeal
9.	Municipal Assembly Councilor	Decision determining that the public official did not respect the imposed deadline of the warning measure and did not stop simultaneously performing the public office of a counselor and the duties of a member - president of the council of the local community	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
10.	MP	Decision determining violation of Art. 28, paragraph 4 of the Law on the Agency because the official performed other public functions without the approval of the Agency in the previous period	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
11.	Member of the Republic Electoral Commission	Decision determining violation of Art. 28, paragraph 4 of the Law on the Agency for the performance of another public function of the councilor of the city assembly without the approval of the Agency	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
12.	Company Managing Director	Decision rejecting the request for approval of another public office of a member of the Supervisory Board of a joint stock company		Judgment rejecting the appeal
13.	Head of Directorate	Decision determining violation of Art. 27, paragraph 2 and 3 of the Law on Agency (decision by which the official, among other candidates, appoints himself for specialization studies at the expense of funds from the budget)	Warning to fully adhere to the Law on Agency in the future	Judgment rejecting the appeal
14.	Former member of the school board and former acting director of a tourist school	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (participation as a member of the school board at the board meeting in which he was appointed acting director)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal

15.	Former Acting Director of the Healthcare Center	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (the official approved specialization studies for himself/herself)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
16.	Director of Technical College for Vocational Studies	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
17.	Temporary representative of the capital of the privatization entity	Decision determining violation of Art. 28, paragraph 4 of the Law on the Agency for the performance of another public function of the Director General – member of the Executive Board of the company without the approval of the Agency	Termination of the second public office by force of law	Judgment rejecting the appeal
18.	Municipal President	Decision determining that the public official did not respect the imposed warning measure and transferred the management rights in the company	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
19.	Municipal Assembly Councilor	Decision determining violation of Art. 27, paragraph 2 and 3 of the Law on Agency (due to simultaneously performing the public office of a counselor and the duties of president of the local community)	Warning measure to stop simultaneously performing public office and other duties	Judgment rejecting the appeal
20.	Former Director of Vocational Applied Studies College	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (the official was elected after the competition for the title of school lecturer, himself/herself previously announcing the competition and forming the committee)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment rejecting the appeal
21.	Municipal President	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (the attorney of natural persons conducting court proceedings against the municipality is a related person with an official)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
22.	Director of Teachers' College	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal

23.	Principal of Grammar School	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Decision suspending proceedings due to the prosecutor's dismissal of the lawsuit
24.	Managing director of a pharmacy	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (conclusion of a contract with a company employing a person related with an official)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment rejecting the appeal
25.	Principal of the School of Economics and Commerce	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of a recommendation for dismissal from public office	Judgment accepting the appeal
26.	Former Clinical Centre Director	Decision determining violation of Art. 27 and 32, paragraph 1 of the Law on Agency (nepotism and failure to notify the Agency of conflicts of interest)	Measure of public disclosure of the decision on the violation of the Law on Agency	Judgment accepting the appeal
27.	Mayor	Decision determining violation of Art. 43, paragraph 2 Of the Law on Agency (delayed reporting on assets)	Warning to comply with the law in the future	Judgment accepting the appeal

Research conducted and analyses made in 2020	
1.	Research into the position of anti-corruption bodies of countries in the region according to applicable regulations
2.	Research into the financing of anti-corruption institutions in the region in 2018 and 2019
3.	Research and analysis of the incompatibility of functions in several countries of the European Union
4.	Research and analysis of submitting reports on the assets and incomes of public officials, contents and verification of the data from the said reports in the countries of the region
5.	Statistical analysis of the 2019 gift catalogue
6.	Comparative overview of regulations on electoral systems and financing of political entities in Western Balkan countries
7.	Research into the transparency of the work of anti-corruption bodies of the countries in the region
8.	Regulation on conflicts of interest of several EU countries
9.	Mini research of countries in which the obligation of political entities to submit financial reports on election campaign expenses during the election campaign is legally prescribed.
10.	Comparative overview of the Global Corruption Perception Index CPI for 2015, 2016, 2017, 2018 and 2019 – overview of countries that achieved the highest growth
11.	Comparative analysis of codes of ethics applicable to employees of anti-corruption institutions of former SFRY countries
12.	Comparative analysis of opinion polls on citizens' perceptions of the fight against corruption in Serbia and Montenegro in 2020

Professional training of employees

National Academy of Public Administration programs

No.	TRAINING TITLE	No. of trainings held	No. of employees
1.	Overcoming stress	1	1
2.	Development of training programs	1	1
3.	Agile Internet search	1	3
4.	IT security	1	2
5.	Presentations in <i>MS Power point ECDL1</i>	1	1
6.	Teams and teamwork	1	1
7.	Communication skills	1	1
8.	Application of grammatical, stylistic and spelling rules in drafting regulations	1	2
9.	Basic systems of state administration - Introductory training program for employees	1	2
10.	Office operations	1	1
11.	Budget accounting and reporting	1	1
12.	Public procurement – new points in the legislation	1	2
13.	Training of civil servants performing public functions	1	9
14.	Evaluation of work performance	1	17
15.	Funding programs of public interest implemented by the associations	1	1
16.	Electronic administration and digitization	1	1

Training of employees organized by international partners

No.	TRAINING TITLE	Organizer	No. of employees
1.	Time and priority management	Ministry of Justice of the RS	1
2.	Economic measures of the RS Government and specificity of operations in the state of emergency	IPC	1
3.	Analysis and processing of data with special emphasis on anti-corruption data	IPA 2013 Prevention and Combat Against Corruption	5
4.	Training on methodology for research and analysis	USAID/GAI	11
5.	Research and analysis methodology	USAID/GAI	7
6.	Basics of research and analytics	USAID	5
7.	Assertive communication	OSCE	15
8.	BCEC 2020 International Conference on Compliance and Business Ethics	EISEP – European Institute of Compliance and Business Ethics	2
9.	Mock trial - Special departments for the repression of corruption	EU project Prevention and Combat Against Corruption	2
10.	Single register of beneficiaries of public funds	Ministry of Finance	2
11.	Corruption risk assessment in regulations	OSCE	4
12.	Information security in the whistleblowing procedure	EU project Prevention and Combat Against Corruption	1
13.	Training on analytical decision-making charts for reports on the assets and incomes of public officials	USAID	6

Program structure of the budget and implementation of the budget

No.	Program activity	Project	Current budget	Funding source
1.	Prevention of corruption and control in the function of preventing corruption – 0007		266,264,000.00	01 – revenue from the budget
2.		Raising public awareness – 4004	0	01 – revenue from the budget
3.		Grants to civil society organizations - 4007	1,440,000.00	01 – revenue from the budget
4.		Parliamentary elections – 7066	24,875,000.00	01 – revenue from the budget
Total:			292,579,000.00	

2020 budget execution according to the programed budget

Program activity: 0007 – Prevention of corruption and control for the purpose of preventing corruption.

Economic classification	Item title in the budget	Planned (in RSD)	Expenditure (in RSD)	Percent (%)
411	Salaries, allowances and employee benefits	140,974,000.00	137,279,340.45	97.38
412	Social contributions charged to the employer	23,474,000.00	22,794,646.76	97.10
413	Compensation in kind	800,000.00	638,080.00	79.76
414	Social benefits to employees	3,220,000.00	1,074,577.74	33.37
415	Employee cost compensation	2,740,000.00	2,553,251.66	93.18
416	Compensation of employees and other special expenses	1,740,000.00	1,407,774.53	80.90
421	Other expenses	5,255,000.00	4,190,496.14	79.74
422	Travel expenses at home and abroad	3,037,000.00	1,206,806.57	39.73
423	Contractual services	39,609,000.00	38,756,338.67	97.85
424	Specialized services	200,000.00	0	0
425	Regular repairs and maintenance	5,470,000.00	3,714,611.23	67.91
426	Material	2,758,000.00	2,564,126.92	92.97
462	Grants to international organizations	851,000.00	825,573.70	97.02
482	Taxes, obligatory fees and penalties	290,000.00	32,030.00	11.04
483	Monetary fines and penalties as decided by the courts	300,000.00	196,110.00	65.37
485	Compensation for injuries or damage caused by state bodies	250,000.00	0	0
511	Expenditure on non-financial assets – buildings	4,291,000.00	4,123,212.00	96.09
512	Machinery and equipment	28,165,000.00	26,215,912.25	93.08
515	Intangible assets	2,840,000.00	2,823,177.36	99.41
Total:		266,264,000.00	250,396,065.98	94.04

Project 4004 – Raising public awareness

Economic classification	Item title in the budget	Planned (in RSD)	Expenditure (in RSD)	Percent (%)
423	Contractual services	0	0	0
Total:		0	0	0

Project 4007 - Grants to civil society organizations

Economic classification	Item title in the budget	Planned (in RSD)	Expenditure (in RSD)	Percent (%)
481	Grants to non-governmental organizations	1,440,000.00	1,169,932.98	81.25
Total:		1,440,000.00	1,169,932.98	81.25

Project 7066 - Parliamentary and local elections

Economic classification	Item title in the budget	Planned (in RSD)	Expenditure (in RSD)	Percent (%)
421	Other expenses	40,000.00	40,000.00	100
423	Contractual services	23,160,000.00	22,806,774.14	98.47
426	Material	80,000.00	79,175.00	98.97
512	Machinery and equipment	1,595,000.00	1,592,280.00	99.83
Total:		24,875,000.00	24,870,248.39	99.98

Public procurement

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

No.	Type of goods/services	Procurement type	VAT excl. amount	Legal entity with which the contract was concluded
1.	Employee insurance	Open procedure, CPP	24,000.00	<i>Wiener Städtische</i> a.d.o. Belgrade
			141,050.00	<i>Generali osiguranje</i> a.d.o. Belgrade
			194,400.00	<i>Generali osiguranje</i> a.d.o. Belgrade
2.	Photographic equipment	Small value public procurement	1,326,900.00	<i>Magnetic system</i> d.o.o. Beograd
3.	Physical-technical and fire protection of the facility	Small value public procurement	2,400,000.00	Dobergard d.o.o. Belgrade
4.	Print services	Small value public procurement	1,550,135.00	<i>Prototype</i> d.o.o. Beograd
5.	Maintenance of computer equipment	Open procedure, CPP	220,000.00	<i>Nepo system</i> d.o.o. Beograd
			200,000.00	<i>Malex-City Copy Service</i> d.o.o. Beograd
6.	Brokerage services for transportation, hotel services, and space rent	Open procedure, CPP	5,298,333.00	<i>Fogg Travel Club</i> d.o.o. Beograd
7.	Printer toners	Open procedure, CPP	15,950.00	<i>Ivađo</i> d.o.o. Beograd
			223,240.00	<i>Oblak tehnologije</i> d.o.o. Beograd
8.	Maintenance of UPS device	Open procedure, CPP	1,250,000.00	<i>Enel PS</i> d.o.o. Beograd
9.	Vehicle insurance	Open procedure, CPP	54,516.00	Dunav osiguranje a.d.o. Belgrade
			114,239.00	<i>Dunav osiguranje</i> a.d.o. Belgrade
10.	Mobile telephony	Open procedure, CPP	990,000.00	<i>Telekom Srbija</i> a.d. Beograd
11.	Mobile phones	Small value public procurement	704,496.00	<i>Laptop centar</i> d.o.o. Beograd
12.	Professional IT system support	Open procedure, CPP	6,200,000.00	<i>Vlatacom Institut</i> d.o.o. Beograd
13.	Computer equipment	Open procedure, CPP	9,268,200.00	<i>Magnetic system</i> d.o.o. Beograd
			1,679,000.00	<i>Magnetic system</i> d.o.o. Beograd

14.	Asset insurance	Open procedure, CPP	122,632.00	<i>Wiener Städtische</i> a.d.o. Belgrade
15.	Ongoing software maintenance and improvement	Open procedure, CPP	1,416,666.00	<i>Prozone</i> d.o.o. Novi Sad
16.	Computer equipment	Open procedure, CPP	4,594,200.00	<i>Magnetic system</i> d.o.o. Beograd
			1,628,300.00	<i>Laptop centar</i> d.o.o. Beograd
			3,388,092.00	<i>Perihard inženjering</i> d.o.o. Beograd
17.	Computer Software	Open procedure, CPP	628,515.00	<i>Extreme</i> d.o.o. Beograd
			1,682,500.00	<i>Magnetic system</i> d.o.o. Beograd
18.	Fuel	Open procedure, CPP	77,700.00	<i>NIS</i> a.d. Novi Sad