

Republic of Serbia
ANTI-CORRUPTION AGENCY

**ANNUAL REPORT
OF THE ANTI-CORRUPTION AGENCY
FOR 2019**

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FOREWORD

Here is the tenth report on the work of the Anti-Corruption Agency which we annually submit to the National Assembly of the Republic of Serbia in accordance with the Law on the Anti-Corruption Agency.

The Agency marked ten years of work, and having in mind the results it has achieved, but also the challenges it faces, it defined strategic directions for the next five years, in order to systematically improve capacities, strengthen cooperation on national and international level and, most importantly, continue to work responsibly on the public interest protection.

In the year behind us, the Agency received new, significant powers at the beginning of the implementation of the Law on Lobbying. It will receive extended competencies in September this year as well, following the entry into force of the Law on Prevention of Corruption, which will result in changing its name to Agency for Prevention of Corruption, to fully reflect its primarily preventive role. Already established cooperation with repressive bodies will further contribute to the creation of an anti-corruption framework, which will serve the citizens and strengthen their trust in the work and integrity of the institutions and those who represent them.

In order to perform the existing and new duties even more efficiently and effectively, the Agency received extremely significant support from the institutions of the Republic of Serbia, in the form of the necessary approvals for the employment of new people, as well as increased budget funds. It is increasingly recognized internationally as an example of good practice, and the dedicated efforts of all relevant state bodies have resulted in the Republic of Serbia no longer being among the countries with compliance with the recommendations of the Group of States against Corruption of the Council of Europe (GRECO) defined as "globally unsatisfactory". This is a special incentive for all anti-corruption institutions of the Republic of Serbia to continue working on harmonization with international standards in this field.

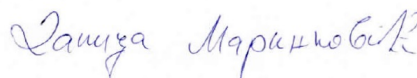
Partnership with civil society organizations and the media is of particular importance, as is the involvement of young people and raising their awareness, both of the threat and danger posed by corruption and of the importance of continuous work to improve personal and institutional integrity. Essentially understanding the role of the Agency, the international community has continued to support it through various modalities in the fight in which we all have a common goal.

The duty and priority of the director and the Board of the Agency, as well as all employees, is to persevere in that fight.

AGENCY'S DIRECTOR



CHAIRMAN OF THE AGENCY'S BOARD



ANTI - CORRUPTION AGENCY

AUTONOMOUS AND INDEPENDENT STATE BODY THAT ENSURES LAWFUL DISPOSAL OF PUBLIC RESOURCES AND PROTECTS THE PUBLIC INTEREST BY PREVENTING CORRUPTION

The establishment, legal position, competence, organization and manner of work are regulated by the **Law on the Anti-Corruption Agency** (hereinafter referred to as the Law on the Agency), which has been in force since January 1, 2010.¹

The Agency is responsible for the performance of tasks within its competence to its founder, the National Assembly of the Republic of Serbia.

COMPETENCIES

Established by the **Law on the Agency**:

- overseeing the implementation of the Strategy and the Action Plan,
- initiating proceedings and imposing measures for violation of the Law on the Agency,
- resolving conflicts of interest,
- giving opinions and instructions for the implementation of the Law on the Agency,
- initiating changes and adoption of regulations in the field of fight against corruption,
- organizing coordination of work of state bodies in the fight against corruption,
- keeping a register of officials,
- keeping a register of officials assets and incomes,
- providing guidelines for the development of public sector integrity plans,
- introducing and implementing training programs on corruption,
- acting upon complaints by legal entities and individuals,
- organizing research, monitoring and analyzing of data on the state of corruption,
- monitoring international cooperation in the field of fight against corruption,
- performing other tasks as provided by law.

Established by the **Law on Lobbying**:²

- training and issuance of certificates of completed lobbyists training,
- keeping the Register of Lobbyists,
- keeping the Register of legal entities engaged in lobbying,
- keeping Special records of foreign natural and legal persons engaged in lobbying,

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"RS Official Gazette", no. 97/08, 53/10, 66/11 - decision of CC, 67/13 - decision of CC, 112/13 - authentic interpretation and 8/15 - decision of CC and 88/19

² "RS Official Gazette", no. 87/18, 86/19 – as amended

- control of the content and manner of keeping records of government bodies on lobbying contacts of officials who have been elected, appointed, nominated, employed or otherwise engaged in that body,
- imposing measures in case of violation of obligations to the lobbied person or the responsible person in the authority, in accordance with the law governing the prevention of corruption, i.e. initiating disciplinary proceedings,
- verification of reports on the work of lobbyists or legal entities engaged in lobbying,
- submission of a request for initiating misdemeanor proceedings for misdemeanors prescribed by law.

Established by the **Law on Financing of Political Activities**:³

- control of financing of political entities,
- keeping records of financial statements of political entities,
- organization and coordination of election campaign observers,
- giving opinions and instructions regarding the application of the Law.

The agency is represented by the Director. The **Director** manages the work, organizes and ensures lawful and efficient carrying out of the Agency's activities, makes decisions on violation of the Law on the Agency and imposes measures, gives opinions and instructions for the implementation of the Law on the Agency and enforces the Board's decision. He drafts a proposal of budget funds for the work of the Agency, prepares the annual report of the Agency, adopts general and individual acts, decides on rights, obligations and responsibilities of the Agency employees, and performs other tasks as provided by the Law.

During 2019, several bylaws within the competency of the Agency and the internal organization were adopted or amended.

Rulebooks regulate issues concerning the activities of election campaign observers, the content and manner of keeping registers of officials and assets. In the field of lobbying, the Lobbyists Training Program and acts that regulate the appearance and content of application forms, reports, records and the manner of keeping registers and special records have been adopted. A Code of Conduct for lobbying participants has been adopted. The Rulebook on conducting a public competition for the allocation of funds to civil society organizations for the implementation of projects in the field of the fight against corruption will enable better involvement of citizens in anti-corruption activities.

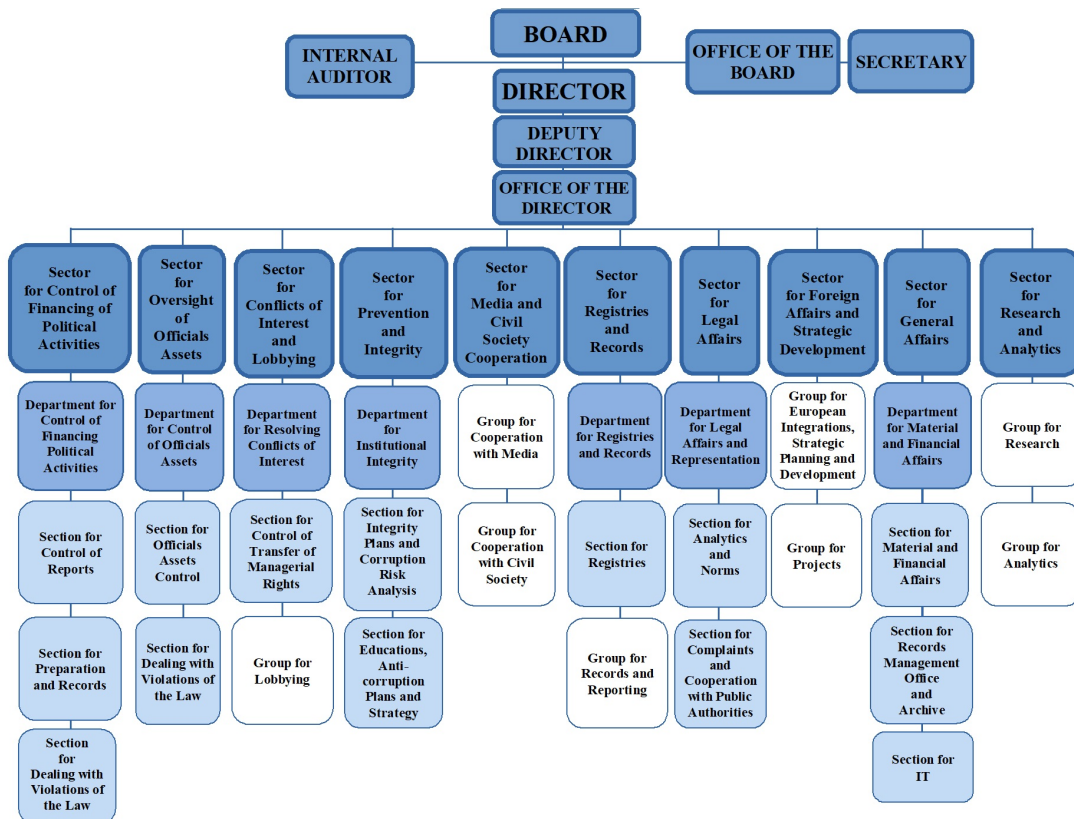
Rulebooks regulating the internal organization of the Agency refer to filling jobs in the Agency, as well as the rights and obligations of employees in connection with the work in the information system.

The Director is elected and dismissed by the **Board**. The Board decides on appeals against decisions of the Director imposing measures in accordance with the Law on the Agency, adopts the annual report of the Agency submitted to the National Assembly, oversees the work and financial status of the Director, proposes budget funds for the Agency work and performs other tasks determined by the Law on the Agency.

³ "RS Official Gazette", no. 43/11, 123/14, 88/19

ORGANIZATIONAL STRUCTURE

By the Rulebook on internal organization and systematization of jobs in the Anti-corruption Agency dated March 14, 2019, ten basic and two special internal units were formed to perform tasks within the scope of the Agency. In the sectors as basic organizational units, departments, divisions and groups were formed as internal units.



GRAPHIC VIEW OF ORGANIZATIONAL STRUCTURE

The Republic of Serbia has recognized the importance of staff empowerment of the Agency and by approving the new Rulebook on internal organization and systematization of jobs in the Agency, as well as by approving additional funds, it has enabled the increase of staff capacity. Compared to the previous Rulebook, which provided for 139 employees in 92 jobs, the new Rulebook opens the possibility for **163 employees** in 126 jobs.

In accordance with that, in 2019, public calls were announced for filling managerial and executive positions, as follows: public calls for **filling positions in the service** from June 12, 2019 and August 29, 2019 and a public call for filling **26 executive positions** from September 25, 2019. The calls are in progress, and as at December 31, 2019, the Professional Service of the Agency **employs 80 people**, which amounts to 49.08% of vacancies.

With the task of continuous improvement of human resources and in accordance with the Program of professional training and additional education for 2019, employees attended 27 trainings organized by the National Academy of Public Administration and 16 trainings organized by international partners. They attended professional trainings in the field of public policy management,

civil service administration, legislative process and administrative acts management, inspection supervision, public finances, international development aid and EU funds management, European integration, human resources management, security, occupational safety and health, fight against corruption, protection of human rights and data secrecy, business communication, foreign language, information and communication skills, lecturers training, personal development and skills and EU cohesion policy.

The Law on the Budget of the Republic of Serbia⁴ for 2019 allocated funds in the amount of RSD 252,744,000.00 dinars for the work of the Anti-Corruption Agency. By changing the financial plan for 2019, the final amount of funds for the work of the Agency for 2019 was RSD 254,616,849.00. Seven public procurement procedures were conducted.

The total execution in 2019 amounted to RSD 240,009,147.20, which is 94.26% of the approved funds. Out of that, the execution when it comes to funds from the budget amounts to RSD 225,502,297.70, i.e. 93.91% of the approved funds, and the execution of funds from EU financial aid amounts to RSD 14,506,849.52, which is 100% of approved funds. Unspent funds were returned to the budget.

Dedicated to the mission of prevention in the comprehensive fight against corruption, in the 2019-2023 Strategic Plan, the Agency defined integrity, independence, accountability, transparency, impartiality, objectivity and respect for personal dignity as key values. The vision of the Agency is a reduced opportunity for corrupt practices and therefore our primary tasks in the coming period will be:

ENHANCED ORGANIZATIONAL CAPACITIES AND IMPROVED PERSONAL AND ORGANIZATIONAL RESPONSIBILITY

⁴ "RS Official Gazette", no. 95/18

AGENCY BOARD

CONTROL ROLE HOLDER AND ACTIVE CREATOR OF THE AGENCY'S STRATEGIC GOALS

In order to ensure two-level decision-making, the Board decides on appeals against decisions of the Director and makes decisions regarding other legal remedies of officials, takes legal positions and makes decisions on legal issues.

Between meetings, Board members analyze cases on which they report and work with advisors to draft decisions.

Regarding complex legal issues, they study the regulations regulating a certain disputable legal issue, in order to take legal positions. The supervisory role of the Board is also fulfilled by reviewing written monthly reports prepared and submitted to the Board by the Director, as well as by orally reporting to the Director on the Agency work at the Board meetings. The Board members participate in the creation of the Agency's policy, cooperate with the Director and take an active part in the implementation of certain Agency activities in the exercise of its competence.

The Board adopted the Agency Report for 2018, which also contains the Report on the implementation of the National Anti-Corruption Strategy in the Republic of Serbia and the Revised Action Plan for its implementation for 2018, with an assessment of all activities of the Revised Action Plan from 2016 to 2018.

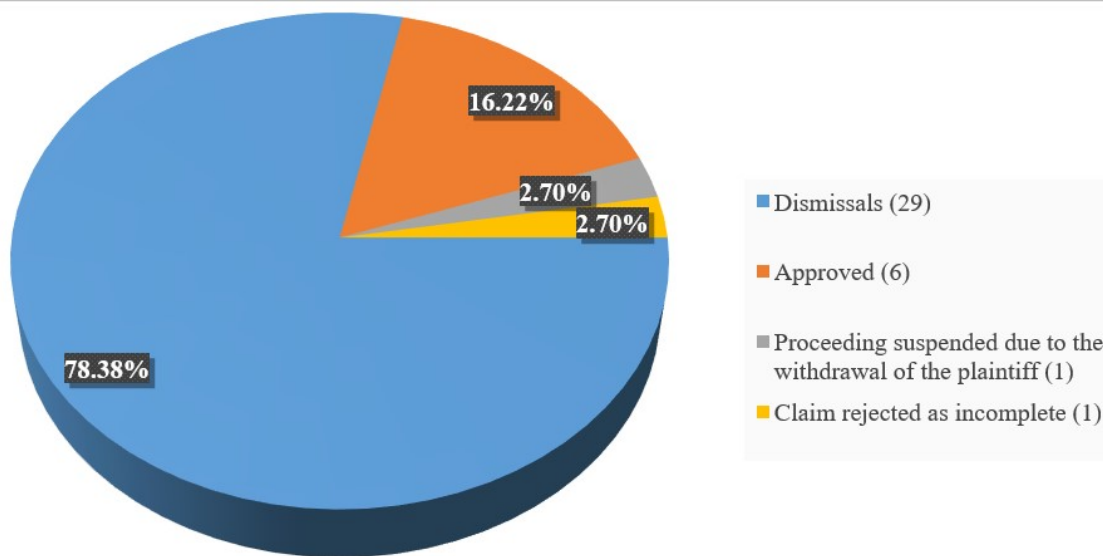
A positive opinion was given to the Director of the Agency on the Rulebook on internal organization and systematization of jobs in the Anti-Corruption Agency with forms of competencies for all jobs in the Agency which are an integral part of the Rulebook.

The Draft Financial Plan of the Anti-Corruption Agency for 2020 was adopted, with projections for 2021 and 2022.

During 2019, the Board decided on 109 filed appeals in **107 cases**.

The Board received for response from the Administrative Court 32 lawsuits filed to annul the Board decisions made in the appeal procedure (of which 17 lawsuits to annul the Board decisions made in 2019, and 15 lawsuits to annul the decisions made in 2018). There are also 20 administrative disputes before the Administrative Court on lawsuits filed by officials from previous years (16 on lawsuits filed in 2017 and four on lawsuits from previous years).

During 2019, the Administrative Court submitted to the Board 37 decisions (35 verdicts and two decisions). **29 lawsuits were rejected**, six lawsuits were upheld, one lawsuit proceedings was suspended by the decision of the Administrative Court due to the plaintiff's withdrawal of the lawsuit, while one lawsuit was rejected by a decision as incomplete.



OVERVIEW OF THE ADMINISTRATIVE COURT ACTING UPON DECISIONS OF THE AGENCY BOARD

COMPOSITION OF THE AGENCY BOARD

In the reporting period, the Board worked with eight members, as member elected on the proposal of the Serbian Bar Association was not elected. From April 1, 2019, after the expiration of the term of one member until the end of the reporting period, the Board consisted of seven members:

- Danica Marinković, **Chairman**, Judge of the Court of Appeals in Kragujevac, retired, elected on the proposal of the Administrative Board of the National Assembly,
- Ass. Prof. Miloš Stanković, PhD, **Deputy Chairman**, Assistant Professor at the Faculty of Law, University of Belgrade, elected on the proposal of the President of the Republic,
- Slobodan Gazivoda, member, retired judge of the Supreme Court of Serbia, elected on the proposal of the Supreme Court of Cassation,
- Ivan Kovačević, MA, member, General Manager of the “Đuro Salaj” AD Business System, elected on the proposal of the Social and Economic Council,
- Ass. Prof. Jelena Stanković, PhD, member, assistant professor at the Faculty of Economics, University of Niš, elected on the proposal of the State Audit Institution,
- Janko Lazarević, member, retired judge of the Supreme Court, elected on the proposal of the Ombudsman,
- Živojin Rakočević, MA, member, writer and journalist, elected on the proposal of the Association of Journalists of Serbia and the Independent Association of Journalists of Serbia and
- Prof. Dragan Mitrović, PhD, full professor at Faculty of Law, University of Belgrade, elected on the proposal of the Government of the Republic of Serbia on March 20, 2015 (his term expired on April 1, 2019).

The Chairman and Deputy Chairman are elected by the Board members for a period of one year.

CORRUPTION PREVENTION MECHANISMS

CONTROL OF FINANCING OF POLITICAL ACTIVITIES

Importance

By controlling the annual financial reports, reports on the election campaign expenses of political entities and their publishing, the Agency informs the public about the collection and spending of funds of political entities for regular work and the election campaign. At the same time, the Agency reacts to observed violations of the law and submits reports to the competent authorities.

The preventive role of the Agency is also reflected in the provision of professional assistance to responsible persons in political entities in connection with doubts in the application of the law.

Activities and results

All registered political parties, as well as groups of citizens who have representatives in representative bodies, are required to submit to the Agency by April 15 of the current year the **Annual Financial Statement** (hereinafter AFS) for the previous year⁵, as well as the **Report on Contributions and Assets**, with previously obtained certified auditor's opinion.

In 2019, **248 political entities** were required to submit AFS for the previous year, of which 113 were political parties and 135 were groups of citizens. **The legal obligation was fulfilled by 135 political entities**, of which 80 were political parties and 55 were groups of citizens.

The agency **controlled 32 political entities that submitted AFS** for 2018. The criteria to consider when selecting a report for an annual control plan are as follows:

- political entities with the highest reported revenues on duly submitted I1 forms in 2018,
- political entities with the highest reported expenditures in 2018,
- political entities with the largest difference between revenues and expenditures in 2018 and
- all parliamentary political parties.

The control covered **97.86% of the total collected and 97.49% of the total spent funds** realized by all political entities that submitted AFS for 2018.

The following irregularities were observed in the control process:

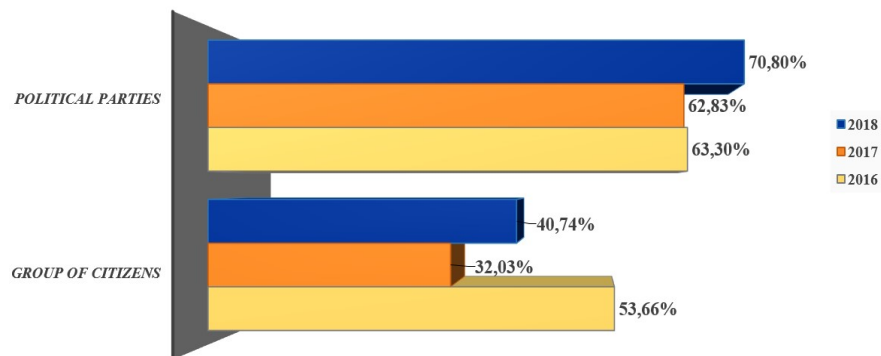
- non-submission of AFS to the Agency,
- failure to submit the certified auditor's opinion with the AFS,
- non-compliance with the obligation to allocate 5% of the total funds received from public sources for regular work in the calendar year for professional development, international cooperation and work with membership,
- exceeding the amount of the maximum value of legal entities contributions,
- non-publication of the AFS on the political entity website,
- non-publication of contributions that exceed the amount of the average monthly salary on the political entity website,
- misuse of funds.

⁵ "RS Official Gazette", No. 7/16, Rulebook on records and reports of a political entity

All political entities with declared electoral lists in the 2019 elections (34 entities) were obliged to submit a **Report on the election campaign expenditures I2**⁶ to the Agency within 30 days from the day of publishing the final results, with data on the origin, amount and structure of collected and spent funds from public and private sources⁷. The legal obligation **was fulfilled by 30** political entities.

The following irregularities were observed in the control process:

- failure to submit the I2 report to the Agency,
- delay in submitting the I2 report to the Agency,
- incorrect presentation of funds in the I2 report to the Agency,
- failure to open a special account for the purpose of collecting and spending funds for the election campaign.



An election campaign is a set of activities of a political entity from the day of calling the elections to the day of announcing the final election results.

Funds intended for financing the election campaign are paid into the political entity's account, from which all payments of election campaign expenditures are made. For the purposes of financing the election campaign (as well as regular work), political entities may borrow from banks and other financial organizations in the Republic of Serbia, in accordance with law. As the election campaign is timed, and after the end of the campaign the election account is no longer an account to which funds can be collected and obligations incurred in the campaign can be paid, one of the options left to the political entity is to settle obligations from the regular work account, which has happened so far in practice. In that case, we can talk about a violation that represents the misuse of funds for regular work. In order to determine in each specific case whether the violation was committed, it is necessary to compare the data from the submitted I2 reports with the data that will be obtained in the process of control of the annual financial statements of political entities in the following period.

Key results

In 2019, the Agency controlled the reports on the election campaign expenses **for the elections of aldermen of the municipalities of Doljevac, Kula, Kladovo, Lučani and Preševo**. The control results were published on the Agency's website, in the form of the Report on the control of political entity expenses - campaigns for the election of aldermen of the municipalities of Arandelovac, Bor, Doljevac, Majdanpek, Kula, Kladovo, Lučani, Preševo, Smederevska Palanka and Sevojno (Užice) in 2018. Apart from the analysis of the sources of financing and election campaign expenses for a total

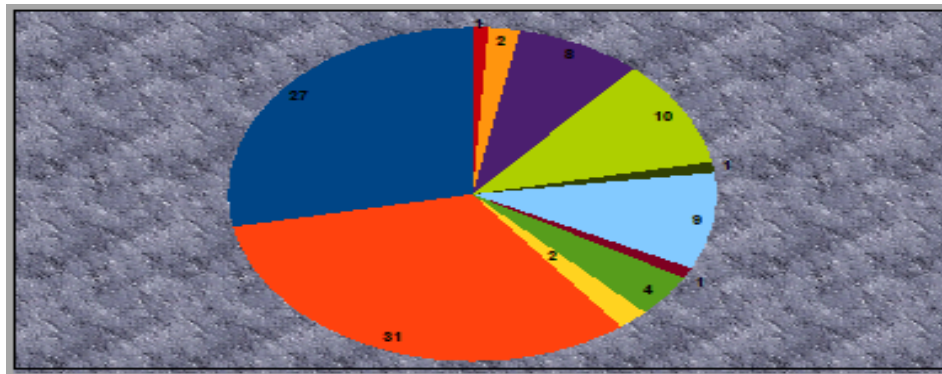
⁶ Hereinafter: I2 report

⁷ "RS Official Gazette", No. 43/11, 123/14 and 88/19

of 30 political entities, **the reports contain an overview of observed irregularities and possible violations of the Law on Financing Political Activities**, as well as data on filed requests for misdemeanor proceedings before the competent court.

In addition to the **30 political entities** for which the control findings were published in the reports on election campaign expenses, **32 annual financial statements of political entities for 2018** were also controlled, the results of which were published on the Agency's website in the form of Reports on the control of political entity financing for 2018.

Within its scope of competency, **15 proceedings** were initiated before the Agency against political entities for violating the provisions of the Law on Financing Political Activities. Due to the violation of the provisions of the Law, the Agency submitted **96 requests for initiating misdemeanor proceedings** before the competent court against political parties and responsible persons in political parties, i.e. responsible persons of groups of citizens.



- Failure to submit AFS for 2017
- Failure to submit AFS for 2018
- Failure to submit the certified auditor opinion with the AFS for 2016
- Failure to use at least 5% of the funds received for regular work on an annual basis for professional development and training, international cooperation and work with membership
- Exceeding of the maximum value of grants in 2017
- Failure to submit election campaign expenses report during 2017
- Improper use of funds in 2018
- Failure to submit election campaign expenses report during 2018
- Submission of election campaign expenses report in 2018, which do not contain all the data
- Failure to open a special account to finance the 2018 election campaign
- Failure to submit data at the request of the Agency

GROUNDNS FOR FILING REQUESTS FOR INITIATION OF MISDEMEANOR PROCEEDINGS

Two reports were submitted to the competent prosecutor's offices due to the suspicion that the responsible persons in the political entities committed criminal acts.

On the basis of final verdicts, **59 decisions were made on the loss of the right to receive funds from public sources** intended for financing regular work for 2020.

VERIFICATION OF INCOME AND ASSETS OF PUBLIC OFFICIALS

Importance

Verification of reports on the assets and income of officials (hereinafter: the report) and overseeing property status during and after the termination of public office is a powerful mechanism for preventing corruption, which contributes to strengthening personal and institutional integrity.

By verifying the reports on the assets and income of officials, the Agency makes a significant contribution to the work of repressive bodies in resolving cases in which there is a suspicion that corruption has already taken place.

Activities and results

Officials are obliged to declare their assets and income upon taking office, during, as well as upon termination of public office.

The Agency examines **timeliness** of reporting, as well as the **accuracy and completeness** of data, according to the annual plan for a certain number and categories of officials. During the verification procedure, officials' assets are overseen, i.e. whether there is a discrepancy between the reported data and the actual situation, and a discrepancy between the increased value of the officials' assets and their lawful and reported income.

The annual report verification plan for 2019 includes **233 officials**, namely directors and acting directors of public companies and business entities (current and former) whose founders / members are the Republic of Serbia, the Autonomous Province of Vojvodina and local self-government units.

Also, during 2019, **a total of ten extraordinary verifications** of officials' reports were initiated due to the suspicion of non-reporting accurate and complete data.

From 2018, in which the Annual Plan included the deans of faculties, university rectors, ministers, assistant and acting assistant ministers, MPs, public prosecutors, a total of **34 report verification procedures** were transferred.

During 2019, the **verification of the Reports for 212 officials was completed** and a total of **74 proceedings** were initiated due to violation of the provisions of the Law on the Agency, of which **63 proceedings** were against officials holding **public functions at the republic level**: ministers, assistant and acting assistant ministers, MPs, directors and acting directors of public companies and business entities founded by the Republic of Serbia, i.e. the Autonomous Province of Vojvodina, as well as judges, prosecutors and deputy prosecutors, state secretaries and **11 proceedings** were against officials holding **public office at the local level**, namely: directors and acting directors of public companies and business entities founded by a unit of local self-government, presidents of municipalities and presidents of the board of directors of business entities.

After the initiated proceedings, **a total of 63 measures were imposed** due to violation of the provisions of the Law on the Agency, namely 61 warning measures and two measures of public announcement of the decision on violation of the Law on the Agency.

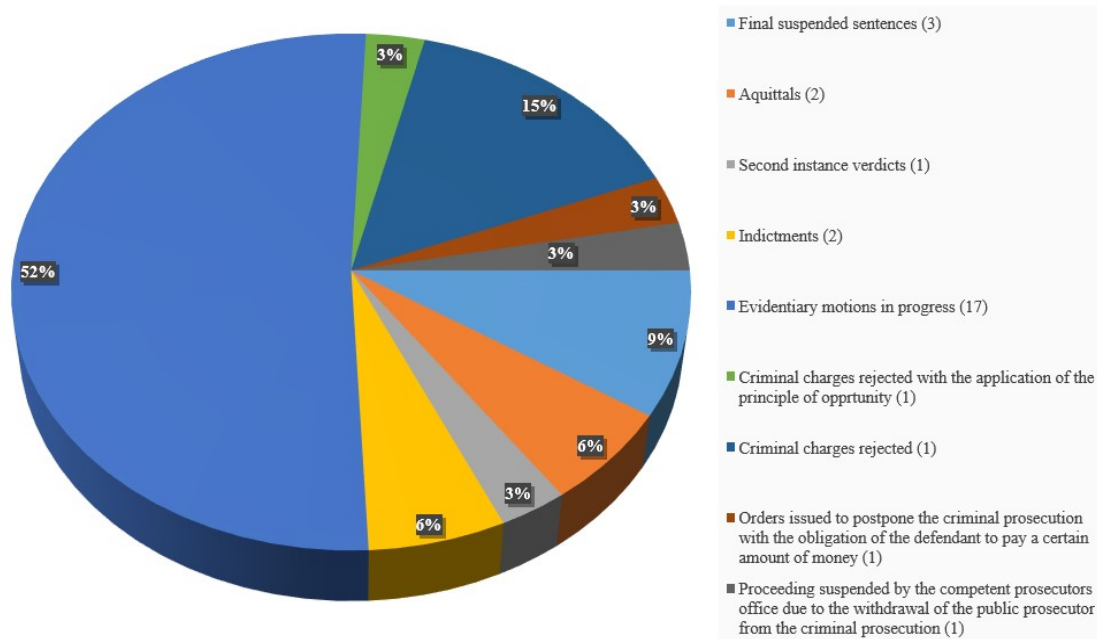
During 2019, the Agency's Board received three appeals against the decisions of the Agency's Director imposing warning measures. In 2019, the Board of the Agency, deciding on the appeals of officials filed before and during 2019, in two cases rejected the appeal filed against the decision of the Director of the Agency.

In 2019, the Misdemeanor Court in Belgrade made a total of 12 decisions based on requests for initiating misdemeanor proceedings filed before and during 2019.

Key results

During 2019, **11 criminal charges and reports** were filed with the competent prosecutor's offices due to the existence of grounds for suspicion that officials did not report assets to the Agency or provided false information, in order to conceal assets data, i.e. due to suspicion that they committed another crime prosecuted ex officio.

Upon criminal charges and reports filed during and before 2019, there were three final suspended sentences, two acquittals, one second instance verdict and one order to postpone the criminal prosecution with the obligation of the defendant to pay a certain amount of money, two indictments were filed, five criminal charges and one criminal charge with the application of the principle of opportunity were rejected, one proceeding was suspended due to the public prosecutor withdrawal of criminal prosecution, and in 17 cases the conduct of evidentiary motions is in progress.



STATISTICS OF ACTING UPON CRIMINAL CHARGES AND REPORTS FILED DURING AND BEFORE 2019

Nine reports were filed to **other competent state bodies** (to the Tax Administration - four, to the Administration for the Prevention of Money Laundering - five), due to the existence of grounds for suspicion that officials whose assets and income were verified committed some other criminal offense within the competence of that body.

A total of **ten requests for initiating misdemeanor proceedings** were filed due to untimely submission of reports on assets and income.

In cooperation with the international expert team of the USAID project and the OSCE Mission to Serbia, **a methodology has been developed for prioritizing the reports of officials to be verified**. In this way, new possibilities for identification have been developed, as well as the method of selection of reports on the assets and income of officials that will be subject to verification.

PREVENTING CONFLICTS OF INTEREST IN HOLDING PUBLIC OFFICES

Importance

By preventing conflicts of interest and unauthorized accumulation of offices, as well as by detecting and sanctioning public officials who do not respect the legal provisions on conflicts of interest, the Agency contributes to raising awareness and responsibility of officials and holders of public powers. Strengthening personal integrity makes the fight against corruption more effective.

Activities and results

Conflict of interest is a constitutional category and the Agency is the only body in the Republic of Serbia competent to decide on conflict of interest in holding public offices. The extent to which the conflict of interest is present in our society is also shown by the fact that during 2019, the Agency received **1,427** new cases.

The total number of measures imposed in the reporting period is **295**. Of these, the greatest number of measures and decisions, 117 in total, were imposed on officials due to the accumulation of offices, followed by (82) measures imposed on officials in situations of conflict of interest and nepotism.

Out of a total of **117** decisions related to the **accumulation of public offices**, the Agency issued 77 warning measures, five measures of public announcement of the decision on violation of the Law on the Agency, and 35 decisions were made terminating the other public office by law.

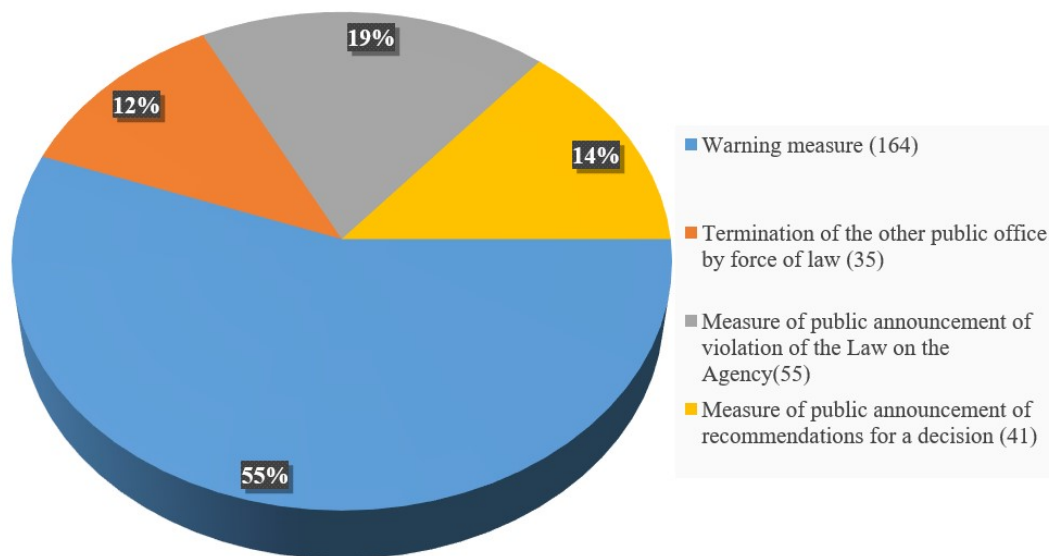
In situations implying **conflict of interest and nepotism**, out of a total of **82** measures, the Agency issued 16 warning measures, 34 measures of public announcement of the decision on violation of the Law on the Agency and 32 measures of public announcement of the recommendation for dismissal from public office.

Due to the **non-transfer of management rights** in the company, the Agency imposed **27 measures**, namely 19 warning measures, four measures of public announcement of the decision on violation of the law and four measures of public announcement of the recommendation for dismissal from public office. Out of these, one measure of public announcement of the recommendation for dismissal from public office was imposed because the official failed to act upon the previously

imposed warning measure and transfer his management rights in the company, within the given deadline.

Regarding the imposed measures of **public announcement of recommendations for dismissal** due to violation of the Law on the Agency in situations of conflict of interest, 19 measures were imposed on officials who hold public offices in educational institutions (primary and secondary schools, higher education institutions and preschools), 18 measures were imposed on officials holding public offices in local self-government units (five municipal presidents, five municipal council members, two heads of municipal administrations, two deputy municipal presidents, two directors of public companies, one director of a cultural center and one director of a tourist organization), two measures were imposed on officials holding public offices in the bodies of healthcare institutions (one to the director of a health center and one to the director of a special hospital), one to the minister and one to the president of the basic court.

Following the enforceability of the Agency's decisions rejecting requests for **approval to hold another public office**, i.e. performing other job or activity, 43 officials ceased holding incompatible public office, i.e. performing jobs, activities, which in percentages is 95.56% of the number of executive decisions of the Agency (45). In 22 proceedings, the decisions are not enforceable or the deadline for submission of evidence is in progress. In two cases, a proceeding was initiated against the officials for determining the violation of the provisions of the Law on the Agency due to the fact that they did not cease holding two or more public offices at the same time.



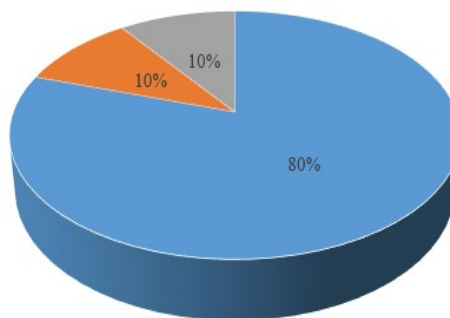
Against the final decisions of the Agency rejecting the requests for approval to hold another public office, i.e. performing other work or activity, three officials filed a lawsuit with the Administrative Court.

One official filed a lawsuit against the decision approving him to establish an employment relationship after the termination of public office.

Eight officials filed a lawsuit with the Administrative Court against the final decisions establishing a violation of the Law on the Agency, seven against the decision imposing a measure of public announcement of recommendation for dismissal from public office and one against a decision imposing a measure public announcement of decision on violation of the law.

In 2019, a total of **ten requests for initiating misdemeanor proceedings** were filed.

The Misdemeanor Court in Belgrade made a total of 36 decisions based on the requests for initiating misdemeanor proceedings filed before and during 2019.



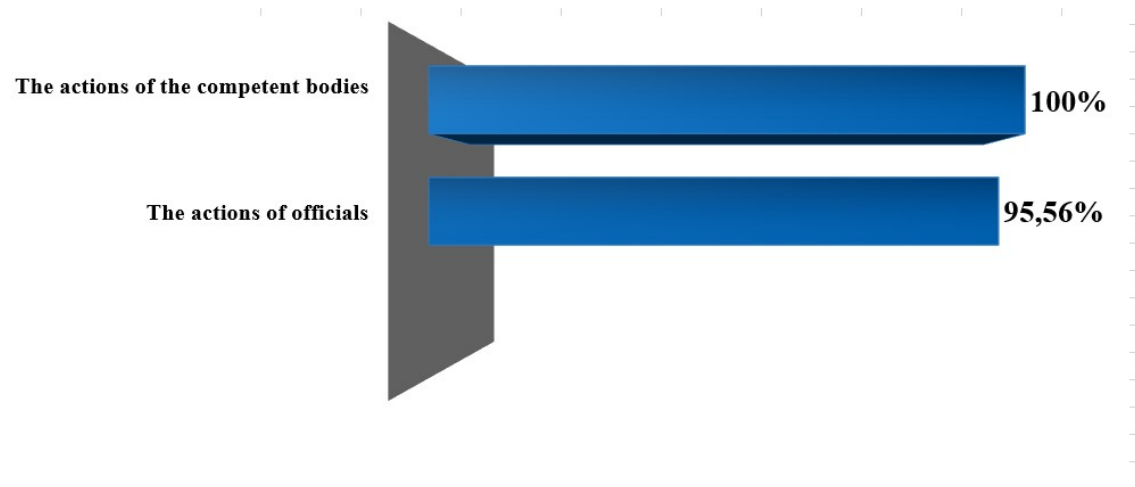
- Prohibition of holding another public office without the consent of the Agency (8)
- Performing another job or activity at the time of taking office (1)
- Prohibition or establishing a company or public service during the holding of public office

Key results

The actions of the competent bodies upon the final and executive decisions of the Director of the Agency determining termination of another public office by force of law is **100%**.

The actions of officials upon the final and executive decisions of the Director of the Agency denying approval for holding several public offices, i.e. performing other job, is **95.56%**.

Proactive resolution of conflicts of interest with an increased number of proceedings initiated ex officio is 10.30%.



LEVEL OF ACTION UPON FINAL AND EXECUTIVE DECISIONS OF THE AGENCY'S DIRECTOR

PREVENTION AND STRENGTHENING INTEGRITY

Importance

Prevention is the first and most important step in successfully combating the problem of corruption. Prevention strengthens and protects the integrity of the public sector and thus contributes to increasing public confidence in the work of institutions and has a long-term effect on reducing corruption in 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.

Activities and results

During 2019, the Agency adopted a special **Program for professional training public sector employees in the field of corruption prevention** (hereinafter: The Program). In accordance with the

Law on Civil Servants, the Program was accredited by the National Academy of Public Administration.

One of the trainings included in the Program is the *Training for trainers in the field of ethics and integrity in public sector*, which the Agency has been conducting for the last five years. The aim of this training is to enable participants to perform independently, i.e. to transfer the necessary knowledge and skills so that they can conduct training on ethics and integrity in the institutions employing them. The Agency started this practice after the adoption of the Action Plan for the implementation of the National Anti-Corruption Strategy in the Republic of Serbia for the period from 2013 to 2018, which provided for amendments to the Law on the Anti-Corruption Agency, so that training on ethics and integrity becomes mandatory for all public sector employees, including officials. On May 21, 2019, the National Assembly of the Republic of Serbia adopted the Law on Prevention of Corruption, which stipulates that the Agency will professionally train the persons who will conduct this training.

During 2019, the Agency organized and conducted two five-day trainings for trainers (training for lecturers), this time in Belgrade and Zrenjanin. Since the previous trainings (trainings for trainers) covered the central and provincial level of government, i.e. state administration bodies and provincial bodies, representatives of local self-government units, i.e. representatives of the City Administration of Belgrade and Zrenjanin, as well as representatives of public and public utility companies. All 30 participants acquired the necessary knowledge and skills, which they demonstrated by performing one segment of training and taking a knowledge test, thus fulfilling the criteria for obtaining a certificate.

During 2019, **166 participants** enrolled in a distance learning course (online training) on ethics and integrity, of which 88 (53%) successfully completed it, passing the knowledge test. This year, the tendency has continued that employees who work in institutions with integrity plan providing for a measure of education on ethics and integrity. This type of training enables institutions to easily and economically fulfill the envisaged measure, and this is especially important for institutions with a large number of employees. Participants can adapt learning to their work obligations, as they can access the training at any time, and the application allows use via mobile phone.

In accordance with the obligation from the Action Plan for **Chapter 23**, the Agency developed the **Model of the Local Anti-Corruption Plan** for Local Self-Government Units, and then the Model of the Provincial Anti-Corruption Plan (hereinafter: the Model). The LAP model envisages the obligation to adopt an act on monitoring its implementation, so that local self-government units can systematically carry out this activity. In addition to this formal, in practice there has been an essential need to develop a document that will describe in detail how to **monitor and report on the LAP implementation** in order to enable monitoring bodies to carry out their mandate, ensure adequate coordination and cooperation between the various actors involved in the implementation and monitoring of the LAP and give instructions on what mandatory elements the implementation report should contain. In this way, the harmonization of practices in monitoring the LAP implementation in different cities and municipalities is achieved, and thus the quality of this process is improved.

The Agency, with the assistance of the Government Accountability Initiative (GAI/USAID), developed a **Methodology for monitoring and reporting on the local anti-corruption plan implementation** (hereinafter: the Methodology) and presented it to the interested public at a conference held on November 23, 2019 in Belgrade, participated by over 50 representatives of cities and municipalities (members of the LAP implementation monitoring body and coordinators), civil society and international organizations. The methodology addresses issues of obligations and

responsibilities of actors involved in monitoring and reporting on the LAP implementation, describes the process of collecting data on the status of measures and activities prescribed by the LAP from official and alternative sources, is a way of reporting on the LAP implementation and proposing its revision.

In addition to the development and promotion of the Methodology, during 2019, the Agency continued to **collect data from local self-government units on a quarterly basis** about the development of the LAP and establishment of a body for its monitoring. In the period from the beginning of April 2017, when the Agency published the LAP Model, to December 16, 2019, when the local self-government units last notified the Agency of this process, **the LAP was adopted by 102 cities and municipalities (70% of the total 145 LGUs, excl. Kosovo and Metohija)**. Of this number, 81 LAPs were developed after the Model, 14 in part, five adopted plans did not correspond to the Model in terms of form or content, and two local self-government units did not provide sufficient data to assess whether the LAP was made after the Model. A total of **28 cities and municipalities have formed a body that will be in charge of monitoring the LAP implementation**, of which 20 were formed mainly after the Model, four with significant deviations from the Model, while for four bodies there was not enough data to assess compliance. When comparing the data on the number of developed LAPs and the number of formed bodies for its monitoring with the data on whether they were developed after the Model, we can conclude that 20 municipalities and cities have adequately completed this process, thus fulfilling their obligation under the Action Plan for Chapter 23.

Within the second cycle, 4,267 public authorities were obliged to develop and adopt **integrity plans** and implement the improvement measures envisaged therein. In the relevant time period (2016–2019), **2,716 public authorities adopted the integrity plan** and set the decision on its adoption in the dedicated developed application.⁸ In the last phase of the cycle, the decision to adopt the report on the integrity plan implementation was made and put into application by 1,657 institutions. In 2019, the Agency monitored the process of implementing measures from the integrity plans by the methodology whose goal was to ensure the comparability of the collected data with those provided in the phase of control of quality and objectivity of the adopted plans. Appropriate questionnaires were developed for conducting interviews with employees and managers in institutions. The sample of institutions is comparable to the sample on which quality and objectivity control was performed, and the regional distribution of public authorities was taken into account. From the beginning of April to the end of December 2019, the Agency conducted interviews with representatives of 24 institutions from the system of justice, healthcare, education, state administration and local self-government and social policy, from the territory of nine local self-governments: Subotica, Kraljevo, Vranje, Zajecar, Knjaževac, Belgrade, Priboj, Nova Varoš and Čačak.

The control results indicate certain common characteristics that were manifested in all interviewed institutions. First, at the general level, the integrity plan remains a formal obligation for the representatives of the institutions: the model plans are viewed and recognized as a formal order, i.e. as a regulation that must be adopted as is. The existence and intensity of risk, as well as the severity of possible consequences of its implementation are difficult to recognize in the current regulations and processes that take place within the organization. The proposed measures from the integrity plan model are incorporated as is, regardless of whether they are adapted to the given environment or marked as inadequate without a deeper analysis of the context to which they refer. The above statistics are in line with this trend and indicate that, during the entire cycle of the integrity

⁸ On the very day of the deadline (October 31, 2017), slightly more than 14% of public authorities submitted a decision on the adoption of the integrity plan. This document, by the way, is an indicator that the plan has indeed been adopted at the level of an organization.

plan, the two most important moments for institutions are: the deadline for making a formal decision on the integrity plan adoption and the deadline for making a formal decision on adoption the report on its implementation. The integrity plan remains a formal document and very little attention is paid to its content and meaning. Implementation control has also identified certain external factors that significantly affect the functionality of integrity plans, which could jointly be characterized as environmental instability. Uncertainty of the regulatory framework (frequent changes of regulations with opposite outcomes or inconsistent processes that regulate or uncertainty of their implementation) and lack of resources (most often human - employment ban or lack of competent staff in the labor market and financial - lack of funds, i.e. uncertainty that already approved funds will indeed be made available to the institutions) are most often present. When it comes to the internal structure of risk areas and processes, institutions find more familiar and easier to manage the concepts from "traditional" areas and processes (for example, human resources and public finances), while the biggest doubts and ambiguities are expressed in the fields of ethics and integrity (especially processes related to conflict of interest and gift management) and information management and security.

Key results

- Accredited special Program of professional **training** in the field of corruption prevention at the National Academy of Public Administration.
- The entire process of development, monitoring and reporting on the integrity plans implementation in the second cycle realized in electronic form.
- **Report on the implementation of the National Anti-Corruption Strategy** with an assessment of the implementation of all activities from the Revised Action Plan for its implementation for the period 2016-2018 prepared and presented in the National Assembly of the Republic of Serbia together with the Annual Anti-Corruption Agency Report⁹.
- In cooperation with the Government Accountability Initiative (GAI/USAID), a **Methodology for monitoring and reporting on the local anti-corruption plan implementation** was developed and presented.
- In cooperation with the Project "Prevention and Fight against Corruption" (IPA 2013), **Guidelines and Recommendations for the Introduction of Ethics and Integrity Officers in Public Administration of the Republic of Serbia** and Comparative Analysis of the System in the United States, the Netherlands and Croatia, as well as the National normative framework in this field.

⁹ According to the Agency, out of 250 examined activities covered by the Revised Action Plan: 37% were implemented in accordance with the indicator, 60% were not implemented or not implemented in accordance with the indicator and 3% of activities were not evaluated by the Agency as it was not possible to assess compliance. See the Report on the implementation of the National Anti-Corruption Strategy and the Revised Action Plan for its implementation for 2018 with an assessment of the implementation of all activities of the Revised Action Plan from 2016-2018 at <http://www.acas.rs/izvestaji/godisnji-izvestaj/>.

STRENGTHENING CORRUPTION PREVENTION MECHANISMS

KEEPING REGISTERS AND RECORDS

Importance

Establishment of accurate, precise and complete registers and records, as well as regular updating of data in them, is a basic precondition in the procedure of controlling the lawfulness of holding a public office.

Activities and results

Based on the timely submitted notification of the body in which the official holds a public office, the Agency keeps the **Register of Officials**. One of the basic obligations of officials arising from the Law on the Agency is the **obligation to declare assets**. By publishing part of the data from the submitted reports, data on the assets and income of officials are available to the public. This legal obligation is a mechanism for strengthening the integrity of officials and removes doubts about conscientious and responsible holding of public office.

The exchange of gifts is a common protocol practice, and **keeping and publishing a catalog of gifts** gives the public an insight into the nature and value of gifts received by the official during the year. By responsibly keeping records of received appropriate and protocol gifts and reporting to the Agency on their monetary value and safekeeping in public ownership, the authorities strengthen institutional integrity.

Keeping and publishing a list of legal entities in which an official owns more than 20% of shares or stocks enables control of the abuse of public office to gain any benefit for themselves or a related person.

In 2019, a total of **2,964 notifications were received from the bodies** that are obliged to inform the Agency that an official has taken office, i.e. that his office has ceased.

The total number of registered **offices** in the Register of Officials is 77,066, of which **35,473 are active**.

Register of assets and income

In 2019, 5,705 reports on the assets and income of officials were received (hereinafter: the Report), while **8,314 Reports were processed and verified**.

A total of 56,343 Reports have been processed and published from the establishment of the Agency to the end of the reporting period.

The catalog of gifts for 2018 has 668 gifts and was published within the legally prescribed deadline, until June 1, 2019.

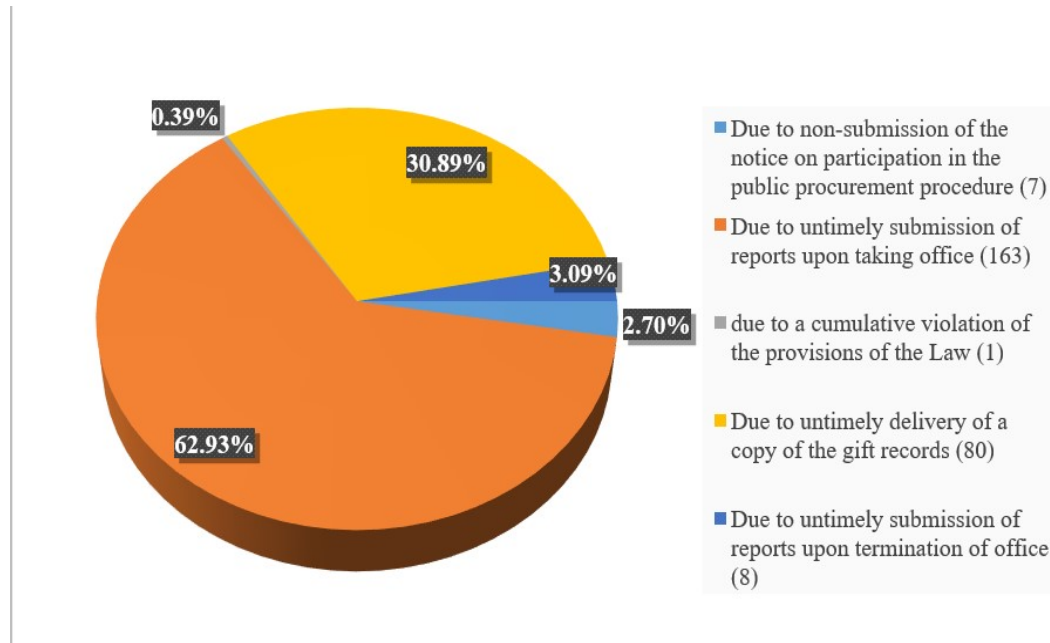
The most common gifts are: books, paintings, photographs, souvenirs, plaques, wines and other alcoholic beverages. The largest number of gifts are protocol gifts. Most gifts were reported by: the General Secretariat of the President of the Republic, the Ministry of Defense, the RS Government, the University of Novi Sad and the RS National Assembly.

During 2019, **nine legal entities in which officials own more than 20% of the shares submitted to the Agency 111 notifications on participation in public procurement procedures, as**

well as **101 notifications on the termination of procedure**. All the above notifications have been verified and published on the Agency's website.

57 proceedings were initiated against officials holding an office at the republic level and **195 proceedings** against officials holding a public office at the local level.

Seven proceedings were initiated against the **responsible persons in the legal entity** for failure to submit a notification on participation in the public procurement procedure.



INITIATED VERIFICATIONS AND PROCEEDINGS FOR VIOLATION OF THE LAW ON THE AGENCY

A total of 246 measures were imposed for violating the Law on the Agency, as follows: 230 warning measures and 16 measures for public announcement of the decision on violation of the law.

A total of 66 requests for initiating misdemeanor proceedings were filed, due to:

- untimely submission of reports on assets and income upon taking office (44) and
- untimely submission of reports on assets and income after termination of office (22).

In 2019, the Misdemeanor Court in Belgrade made a total of 58 decisions based on requests for initiating misdemeanor proceedings filed before and during 2019.

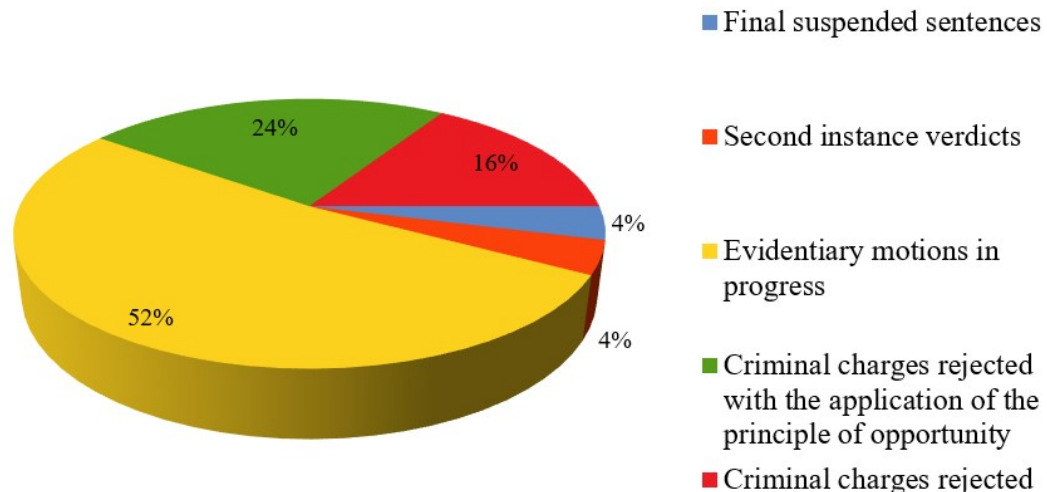
During the reporting period, the Agency filed **12 appeals with the Misdemeanor Court of Appeals**. Appeals have been filed against decisions imposing reprimands (10), acquittal (1) and release from liability (1).

Acting upon the Agency's appeals filed before and during 2019, the Misdemeanor Court of Appeals made decisions in 14 cases, on appeals against verdicts imposing reprimands or fines to officials below the legal minimum.

During 2019, **14 criminal charges were filed with the competent prosecutor's offices** due to the existence of grounds for suspicion that the officials failed to declare assets to the Agency or provided false information about assets.

Upon the criminal charges of the Agency filed to the competent prosecutor's offices before and during 2019:

- one final suspended sentence was passed - a prison sentence of six months with a probation period of two years;
- one second-instance verdict was passed confirming the first-instance acquittal;
- in 13 cases, evidentiary motions are in progress;
- in seven cases, criminal charges were dismissed on the basis of the principle of opportunity;
- in four cases, criminal charges were dismissed.



STATISTICS ON PROCEEDINGS UPON THE AGENCY CRIMINAL CHARGES AND REPORTS FILED TO THE COMPETENT PROSECUTOR'S OFFICES BEFORE AND DURING 2019 IN THE FIELD OF VERIFYING ASSET DECLARING

Key results

- **Increased efficiency** of data entry for the purpose of establishing accurate and up-to-date records and registers.
- **New registers established** - Register of Lobbyists, Register of Legal Entities Engaged in Lobbying and Special Records on Foreign Individuals and Legal Entities Engaged in Lobbying.

INTERNATIONAL COOPERATION

Importance

In circumstances where corruption has long been a transnational phenomenon, an essential precondition for success in implementing mechanisms to prevent and fight corruption is appropriate international cooperation and the building of sustainable partnerships. The international dimension of this fight also contributes significantly to the success of national efforts and reform processes. Only

through mutual support, learning, exchange of experiences and application of international standards can states achieve a common goal in this field.

Activities and results

Recognizing the importance of international cooperation in the field of prevention and fight against corruption, the Agency has made additional efforts in the past year to strengthen existing and identify new opportunities for the exchange of experiences and knowledge with related institutions. In that process it was always guided by the fact that European integration is a strategic priority of the Republic of Serbia, so all types of cooperation have been achieved in that light, including extremely successful coordination with national state institutions and other relevant actors.

Having that in mind, in the **Strategic Plan for the 2019-2023 period** developed with the support of the USAID Government Accountability Initiative, the Agency set as one of the strategic goals the improvement of international cooperation and application of international standards in the field of corruption prevention, with operational goals related to the contribution to the European integration process of the Republic of Serbia and international anti-corruption initiatives.

New challenges in this field require different approaches to international cooperation, as well as quick and flexible responses. The Agency confirmed its commitment to the work of the **Network of Corruption Prevention Authorities**, of which it was one of the founders in 2018 at the invitation of the Italian National Anti-Corruption Agency. At the end of 2019, it was elected vice president of the Network for the second time; in 2020 the network will be chaired by the French Anti-Corruption Agency, and the other two vice presidents will be the National Anti-Corruption Agency of Italy and the National Agency for Integrity, Prevention and Anti-Corruption of Morocco.

Equal attention was paid to **bilateral cooperation** with related institutions, which has resulted in additional joint activities with France, Slovakia, Hong Kong and the State of Palestine. In addition, the Agency has for the first time started cooperation with new partners, including the Bureau for Prevention and Fight against Corruption and the Public Revenue Service of Latvia, the National Transparency Body of Greece, as well as the Administrative Control and Transparency Authority of Qatar.

A conference organized on the occasion of December 9, the International Anti-Corruption Day and ten years of the Agency's work was dedicated to innovative answers to current challenges in the field of corruption prevention. Also, on this occasion, a decade of extremely successful cooperation with the OSCE Mission to Serbia was marked, with the support of which the conference was held. In addition to numerous state institutions, civil society organizations and the media, the Agency hosted representatives of anti-corruption bodies from 15 countries, as well as the Secretariat of the Group of States against Corruption of the Council of Europe (GRECO).

The conference was a continuation of the gathering organized in 2018, when the conclusion was adopted that prevention mechanisms should be created and implemented in such a way as to ensure the protection of public interest, but also to make significant efforts to proactively search for new answers to increasingly complex challenges. One of the conclusions of last year's meeting was that the application of existing mechanisms and good practices is of special importance, as well as the use of the potential of innovative solutions, in which cooperation at the national and international level is of key importance.

When it comes to the **process of European integration**, the Agency participates in all activities within the negotiations of the Republic of Serbia for EU membership in the domain of its competence. During the past year, the Agency presented the results of its work through quarterly reporting on the **implementation of the Action Plan for Chapter 23**. With the aim of establishing a system for monitoring results and cases within the scope of the Agency's work, reports on the

implementation of the transitional criteria for Chapter 23 in the field of conflict of interest, reporting and verification of the assets and income of officials, especially judges and prosecutors, as well as controls the financing of political activities, in cooperation with the Republic Public Prosecutor's Office and misdemeanor courts. The Agency is also actively involved in the process of **revising the Action Plan for Chapter 23**, especially in light of the fact that, following the entry into force of the Law on Prevention of Corruption, it will monitor the implementation of the anti-corruption subchapter of the Action Plan for Chapter 23.

Reporting on the results and challenges in the work and for the purposes of **drafting the annual report of the European Commission on the progress of the Republic of Serbia** in reforms, in the field of political criteria, fight against corruption, judiciary and public administration reform, continued; **on the implementation of the Stabilization and Association Agreement (SAA)** through implementing bodies - the SAA Committee, the Subcommittee on Justice, Freedom and Security and the Special Group for Public Administration Reform, as well as the **implementation of the National Program for the Adoption of the EU Acquis**. The Agency was also represented at a meeting of the SAA Committee, the Subcommittee on Justice, Freedom and Security, as well as the European Commission's expert mission in the field of the fight against high corruption, organized crime and money laundering.

In that sense, successful coordination and communication with all relevant state institutions continuously takes place, especially with the National Assembly, the Ministry of European Integration, the Ministry of Justice, the Ministry of Foreign Affairs, the Ministry of Public Administration and Local Self-Government, the Ministry of Interior, the Ministry of Finance, Public Procurement Administration, Administration for the Prevention of Money Laundering, the Republic Public Prosecutor's Office, the State Prosecutors' Council, the High Judicial Council and the Misdemeanor Court.

Cooperation with the National Assembly continued through the **National Branch of the Global Organization of Parliamentarians against Corruption (GOPAC)**, within the project "Strengthening the oversight role and transparency in the work of the National Assembly", supported by the UN Development Program (UNDP) and the Swiss Agency for Development and Cooperation. Topics of discussion were related to the fulfillment of GRECO recommendations, as well as the implementation of the Law on Lobbying.

Constructive talks with **representatives of the international community** in the Republic of Serbia took place last year, especially in the field of harmonization with international recommendations and standards, and meetings were held with representatives of the European Commission, EU Delegation to Serbia, OSCE Mission, USAID, US Embassy, Embassy of France, Germany, the Netherlands, Ukraine and the State of Palestine. The Agency was also visited by representatives of the International Monetary Fund, the World Bank, the US Bureau of International Narcotics and Law Enforcement Affairs, and the Office for Democratic Institutions and Human Rights (ODIHR) in connection with the assessment of the needs to observe the upcoming elections.

Recognizing the work and role of the Agency, the international community has supported the implementation of various projects aimed at comprehensively strengthening the Agency's professional and technical capacity. In the past year, the Agency was directly or indirectly **involved in most projects since its establishment**.

Strategic and operational planning, strengthening cooperation with misdemeanor courts, strengthening analytical and research capacities, development of models of acts for implementation of measures from the integrity plan, creation of Methodology for monitoring and reporting on the implementation of local anti-corruption plan, implementation of activities envisaged by the Action Plan for Chapter 23, including the development of a Handbook for Identifying and Managing

Conflicts of Interest and Incompatibility of Functions, are some of the activities that were supported in the past year through the **USAID Government Accountability Initiative**.

As part of the preparations for the start of implementation of the Law on Lobbying, the Agency was supported by the **OSCE Mission to Serbia and the ODIHR**, through specialized training for employees, training for trainers (with significant support from the **US Department of Justice**), development of the Code of Conduct for lobbying participants, and a study visit to Slovenia. Thanks to the synergy of donor assistance of the OSCE Mission and the USAID Government Accountability Initiative, activities aimed at improving the procedures for drafting the annual plan for verifying officials' assets have been carried out.

Understanding **the importance of involving youth** and strengthening their awareness of the causes and seriousness of corruption, the Agency was also part of the internship program for young professionals from southwestern Serbia, organized by the OSCE Mission to Serbia and the US Mission to the OSCE. During the three-month stay in the Agency, the program participants were able to gain insight into the competencies and mechanisms of corruption prevention applied by the Agency.

Within the **Service Agreement "Prevention and Fight against Corruption"**, which is financed by the EU from the IPA 2013 program, trainings on conflict of interest, registration and verification of assets in the education and healthcare sector in cooperation with line ministries, anti-corruption classes aimed at raising youth awareness, as well as activities related to the implementation of the Law on Organization and Jurisdiction of Government Authorities in the Suppression of Organized Crime, Terrorism and Corruption. This project, among other things, supported the development of the Agency's IT development strategy, reports on the implementation of integrity plans, as well as guidelines and recommendations for the introduction of ethics and integrity officers in public administration of the Republic of Serbia, and comparative analysis of systems in the US, Netherlands and Croatia, as well as the national normative framework.

In the previous year, the Agency established cooperation with the **International Foundation for Electoral Systems from Washington (IFES)**, aimed at strengthening the capacity of employees in the field of controlling the financing of political activities, as well as improving internal procedures for monitoring the election campaigns.

The Agency also received extremely significant technical support from the **US Department of Justice**, which contributed to the improvement of work efficiency, as well as the functional use of existing software.

When it comes to the **programming of international assistance funds**, the Agency continuously participates in the work of sectoral working groups for programming and coordination of IPA funds and other development assistance for the justice, internal affairs and public administration reform sectors, as well as the preparation of relevant documents.

In the previous year, **participation in the work of the Network for the Suppression of Irregularities and Fraud in Handling EU Funds** continued.

In cooperation with partner institutions from Italy and Spain, at the beginning of 2019, the Agency marked the **successful completion of the Twinning project "Prevention and fight against corruption", which was financed by the EU with two million euros** (IPA 2013). The project, which lasted 30 months, was implemented in cooperation with the National Anti-Corruption Agency, Ministry of Justice, the Italian College of Justice and the General Prosecutor's Office of Spain, as well as the Department for Contracting and Financing of EU Funds of the Ministry of Finance (CFCU) and the Ministry of Justice of the Republic of Serbia. The project significantly contributed to strengthening the Agency's capacity, through focused, advanced trainings, thematic studies, legislative framework and comparative analyzes, study visits, internship programs, educational materials, as well as exchange of experiences and knowledge with experts from EU member states. The project also

included activities to strengthen cooperation with other state institutions, civil society organizations and media representatives, with the aim of strengthening joint efforts in this field. The project team held quarterly meetings of the Supervisory Board, which also included representatives of the EU Delegation to Serbia, CFCU, the Ministry of Justice and the Ministry of European Integration. All reports, including the final ones, were approved, thus formally ending the project.

At the invitation of the Head of the EU Delegation to Serbia, **the Director of the Agency participated in a meeting with the ambassadors of all 28 EU member states**, where they discussed the Agency's achievements so far, capacity building and challenges it faces.

As part of the annual reporting cycle on **the implementation of the UN Convention against Corruption (UNCAC)**, **the Agency last year produced an article to the anti-corruption policy and practice** (Article 5 of UNCAC), i.e. lessons learned in developing, evaluating and influencing anti-corruption strategies, in cooperation with the Government of the Republic of Serbia, the Ministry of Justice, the Ministry of Interior, the Ministry of Education, Science and Technological Development and the Council for Implementation of the Action Plan for Chapter 23. **Evaluated as an example of good practice, the Agency presented the experiences of Serbia**, including recommendations for improvement in this field.

Representatives of the Agency paid a **study visit to the anti-corruption institutions of France** with the aim of getting acquainted with the anti-corruption framework of this country. On that occasion, they met with the highest representatives of the Anti-Corruption Agency, the High Authority for Transparency in Public Life, the Court of Auditors, the National Commission for Campaign Accounts and Political Financing, as well as Transparency Commission of France. This is a return visit, after the signing of the Protocol on Cooperation between the two institutions in 2018 in Belgrade.

Within the project of support of the **Slovak Ministry of Foreign and European Affairs and the Agency for International Development Cooperation (SlovakAid)**, a study visit of the Agency's representatives to anti-corruption bodies in Slovakia was organized. The legal framework, results and challenges in the field of prevention and fight against corruption were discussed with representatives of the Sector for Prevention of Corruption in the Prime Minister's Office, the Sector for Crime Prevention of the Ministry of Interior, the National Anti-Corruption Unit, the Special Prosecutor's Office, the Judicial Council and the Taylor Wessing Law Office.

Cooperation with the Hong Kong **Independent Commission Against Corruption** has been strengthened, the highest representatives of which have visited the Agency on two occasions and held specialized training on corruption prevention mechanisms for Agency employees.

The Agency was also represented at the 19th Annual Conference and Session of the **General Assembly of the European Partners Against Corruption / European Contact-point Network Against Corruption (EPAC/EACN)**, which focused on global challenges and mechanisms for preventing corruption. The same session adopted the Stockholm Declaration, which, among other things, encourages members (operational bodies for controlling the work of the police and institutions in charge of preventing and fighting corruption) to exchange information and good practices, develop and implement codes of conduct, develop new approaches to international cooperation, as well as the protection of the independence of institutions, so that they can act deprived of illicit political influence.

A Memorandum of Understanding in the field of prevention and fight against corruption was concluded between the Agency and the Palestinian Anti-Corruption Commission, with the aim of establishing and developing cooperation and coordination, in accordance with UNCAC principles and goals.

An article on the implementation of activities from the Annual Report of the **Anti-Corruption Network of the Organization for Economic Cooperation and Development (ACN / OECD)** was

prepared in coordination with the National Assembly, Ministry of Justice, Ministry of Public Administration and Local Self-Government, Human Resources Management Service, Republic Prosecutor's Office and the Serbian Chamber of Commerce.

Key results

As part of the Delegation of the Republic of Serbia to GRECO, headed by the Director of the Agency, the Agency has made a significant contribution to the joint efforts of relevant institutions, resulting in the **Republic of Serbia being no longer among the countries in a "globally unsatisfactory" regime** in terms of compliance with GRECO recommendations for the Fourth Evaluation Round, which includes the prevention of corruption among MPs, judges and prosecutors. In December 2019, the Republic of Serbia submitted a new compliance report, with information on additional steps taken in the Fourth Evaluation Round.

The Director of the Agency was elected for the second time as one of the three vice-presidents of the Network of Corruption Prevention Authorities at a meeting on the sidelines of the GRECO plenary session in December 2019.

The Agency was again recognized as an example of good practice in the field of corruption prevention, so, among other things, at the invitation and initiative of the organizers, it presented experiences and results at the meeting of the Working Group on Prevention of Corruption of the UN Office on Drugs and Crime (UNODC), within the Conference of the Parties to the UN Convention against Corruption (UNCAC), as well as at the conference on the fight against corruption within the Italian presidency of the Central European Initiative (CEI).

ACTING UPON CITIZENS' COMPLAINTS AND ACCESS TO INFORMATION OF PUBLIC IMPORTANCE

Importance

The Agency has a preventive role in society and has no inspection or investigative powers, so dealing with petitions is an indication to public authorities of actions that create opportunities for corruption in the public sector.

Activities and results

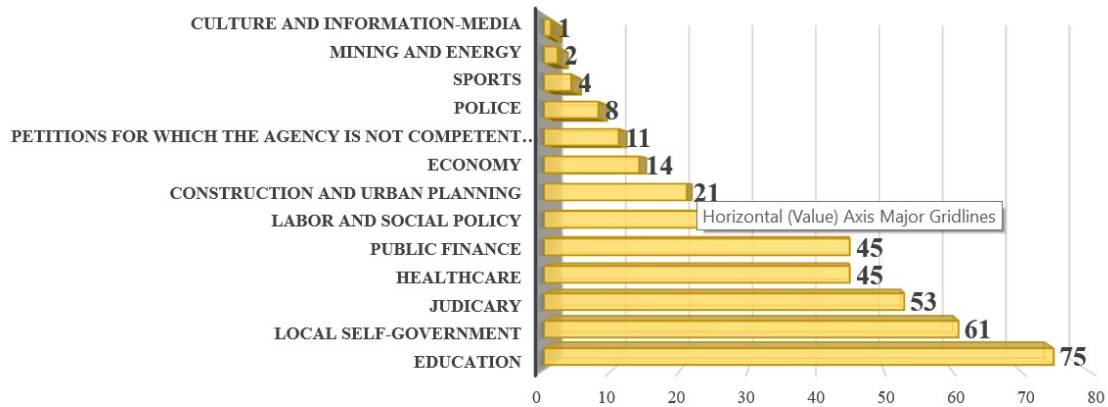
Within its competencies, the Agency acts upon **citizens' petitions** in which the petitioners point to corrupt actions in the manner of work or conduct of a public authority or public official - civil servant in a position, which are not necessarily related to the petitioner or due to which the petitioner considers that his/her rights or legal interest are violated.

During January 2019, the Petitions Department was organized in the newly formed Department for Legal Affairs as a Department for Petitions and Cooperation with Other Public Authorities.

For easier monitoring of the actions of public authorities that lead to corruption, the petitions are classified by areas crucial for building systemic anti-corruption mechanisms, as recognized by the National Anti-Corruption Strategy for the period 2013 to 2018, although this has not exhausted all other areas where corrupt behavior may occur.

In the period from January to December 2019, **373 new cases were formed** based on citizens' petitions.

The structure of new petitions registered in the reporting period: 75 in the field of education, 61 in the field of local self-government, 53 in the field of justice, 45 in the field of public finance, 45 in the field of healthcare, 21 in the field of construction and urban planning, two in the field of mining and energy, eight in the field of police, one in the field of culture and information/media, four in the field of sports, as well as 11 petitions that were assessed as inappropriate, i.e. which the Agency is not competent to act upon.



STRUCTURE OF PETITIONS RECORDED IN THE REPORTING PERIOD

Out of 1,461 cases (formed on the basis of petitions from previous years and petitions received during 2019), **680 cases were completed in the reporting period.**

By checking the merits of the allegations of the petitions, the Agency collects evidence and analyzes their content and cooperates with all public authorities and organizations, bodies of territorial autonomy and local self-government, public services and other legal entities. In the reporting period, the Agency sent 454 letters to public authorities. The Agency most often addressed the Ministry of Education, the Department for Budget Inspection of the Ministry of Finance, the Labor Inspectorate, the Administrative Inspection, the Ministry of Health, the Public Procurement Administration, the Tax Administration, the Republic Commission for Protection of Rights in Public Procurement Procedures, the Chamber of Enforcement Officers, the State Attorney's Office, the High Judicial Council, the Republic Pension and Disability Insurance Fund, the Agency for Restitution, the Sector for Internal Controls of the Ministry of Interior, as well as the competent public prosecutor's offices.

Ten reports were filed to the competent prosecutor's offices due to the existence of grounds for suspicion of a criminal offense

In the reporting period, the Agency received **228 requests for access to information of public importance.**

Most requests were sent by the media (156), and the Agency mostly acted in full or in part by submitting the requested information (147), i.e. upon 93.03% of requests sent by the media. Out of the total number of requests, citizens sent 38, and the Agency mostly acted in full or in part by submitting the requested information (31), i.e. upon 81.58% of those requests. During 2019, non-governmental organizations, i.e. citizens' associations, in 26 cases sent a request to the Agency for the submission of information of public importance, and in 24 cases information was submitted, which accounts for 92.30% of those requests.

There were no rejected requests during the reporting period.

Dissatisfied parties submitted ten complaints to the Commissioner in the reporting period: four (4) due to the rejection of the request and six (6) complaints for other reasons, which is a similar number to that in 2018. In connection with the mentioned complaints, the Commissioner suspended the procedure in two cases since the Agency acted upon the request for access to information of public importance, and in eight cases the procedure is ongoing.

Most requests (103) related to the submission of data regarding the assets of public officials.

Key results

The Agency **responded positively to 209 requests for access to information of public importance** by fully or partially acting upon the largest number of requests (**91.67%**) by submitting the requested information.

ACTIVE AND RESPONSIBLE ATTITUDE TOWARDS THE MEDIA AND CIVIL SOCIETY

Cooperation with the media provides the public with the opportunity to better understand the Agency's competencies. Preparation and distribution of timely, clear and accurate information on the work of the Agency is the basis of a correct and partnership relationship with the media. The organization of round tables and conferences, guest appearances in the media, daily activity on social networks with current information in the field of work in the field of anti-corruption strengthens public confidence in the work of the Agency.

The main external communication channel of the Agency is the website www.acas.rs. During 2019, **98 posts (texts, announcements, information)** were posted on the Agency's website. In the same period, **97 journalist questions** were received. The subject of journalistic interest are most often issues related to cases of conflict of interest, prevention of corruption, dialogue on election conditions, recommendations for dismissal, assets of officials, integrity plans, local anti-corruption plans, financing of political entities.

During 2019, according to the Kliping agency data, 5,048 posts were registered in the media mentioning the Agency with a predominant neutral tone. The agency is also present on social networks. The Agency's pages were visited by over 10,000 users and about 1,000 new followers were gained, so that there are now about 10,600 on Twitter, and about 5,000 on Facebook.

In the field of cooperation with civil society organizations, the Agency organized, coordinated and implemented a program for allocating funds to civil society organizations.

The tenth repeated **call for the allocation of funds to civil society organizations** for the implementation of a project aimed at developing and strengthening the integrity, public accountability and transparency of public authorities with the aim of improving the fight against corruption, was conducted in the second half of 2019. **Funds in the amount of 1,500,000.00 dinars** were allocated to the organization "Bečej Youth Association" for the implementation of the project called "Together towards a more transparent and accountable government". **The project implementation is expected to improve public participation in policy making at the local level.**

LOBBYING

Importance

Establishing a relationship of trust between politicians and businessmen, this is an activity that can meet personal interest for the common good. Lobbying influences the bodies of the Republic of Serbia, autonomous provinces and units of local self-government and bodies of holders of public powers in the process of passing laws, other regulations and general acts. In the reporting period, **lobbying moved from informal to legal frameworks**. The integrity of the public decision-making process has been strengthened, and the introduction of the obligation to inform the Agency about meetings of lobbyists and politicians as lobbied persons has clearly separated lobbying from corruption.

Activities and results

The reporting period is an important year for the field of lobbying in Serbia, as on August 14, 2019, the **Law on Lobbying** came into force, which clearly separated the interest influence on political decision-makers from corruption.

In addition to public debates, which represent an already tried and tested model of social inclusion in decision-making, by introducing lobbyists as professional mediators in regular communication with the authorities, the process of political decision-making is democratically improved.

In addition to the primary action - fight against political corruption, the regulation of lobbying is important because of the transparency of decision-making in public authorities. In the reporting period, we emphasize the key activity and intention of the legislators - to lay a solid foundation for quality regulation of this area. The Agency followed the legal regulation of lobbying by timely adoption of the necessary accompanying bylaws:

- **Code of conduct** for lobbying participants,
- **Rulebook** on the appearance and content of forms, requests, reports, notifications and records and the manner of keeping registers and special records in the lobbying process and
- **Rulebook on the training program** for lobbyists.¹⁰

The Agency was ready to welcome the organization of lobbying activity, and a group of employees successfully completed the training for lobbyists trainers, which was organized by the OSCE Mission to the Republic of Serbia.

We have made an active contribution to conferences and roundtables organized by associations such as the American Chamber of Commerce (AmCham) and the Institute for Lobbying and Crisis Management, which have extensive experience in global analysis of lobbying practices.

We were open to hear the opinion of civil society on this topic also at the roundtables in Niš, Novi Sad, Šabac, Novi Pazar and Belgrade with the organization Transparency Serbia contributed to strengthening and raising public awareness of the role and importance of all participants in the lobbying process, the importance of introducing lobbying in the normative framework and public

¹⁰ "RS Official Gazette", no. 54/19.

access to all information that the lobbying process involves in making a specific political decision or standard.

Key results

By consistently respecting the legal provisions and respecting the ethical rules from the **Code of Conduct for Lobbying Participants**, future lobbyists in the Republic of Serbia will strengthen their professional standards with their knowledge and abilities and will be recommended in regional and international exchange. Adoption of experiences and examples of good practice of leading American and European lobbyists will contribute to this activity becoming an important means of strengthening democracy, based on transparency, rule of law and social responsibility, and on that path they can count on the Agency's support.

ACTIVE ROLE OF THE AGENCY IN ADOPTING LAWS AND OTHER REGULATIONS

In the reporting period, the Agency issued **18 opinions on the assessment of the risk of corruption in proposal and draft regulations**. Requests for opinions were sent by:

- Ministry of Education, Science and Technological Development - seven (7)
- Ministry of State Administration and Local Self-Government - two (2)
- Ministry of Justice - three (3)
- Ministry of Finance - two (2)
- Office for Cooperation with Civil Society of the RS Government - one (1).

COOPERATION WITH OTHER PUBLIC AUTHORITIES

In order to more effectively fight organized crime, in 2019 an Agreement on Cooperation on Establishing and Developing a National Criminal Intelligence System (NCIS) was signed, which will enable electronic exchange of data between all competent institutions.

The Agency is one of the signatories of the agreement, which will strengthen cooperation with the Ministry of Interior, the Ministry of Justice, the Ministry of Finance, the Republic Public Prosecutor's Office, the Office of the National Security Council and Classified Information Protection and the Prosecutor's Office for Organized Crime. The establishment of NCIS will enable the **more effective and efficient fight of the state against organized crime and corruption** through the digitalization and networking of databases of the competent authorities. The establishment of a national criminal intelligence system is envisaged in the Action Plan for Chapter 24 within the accession negotiations of the Republic of Serbia for membership in the European Union.

In the reporting period, the Agency intensified cooperation with **other independent public authorities** - the Ombudsman, the Commissioner for Information of Public Importance and Personal Data Protection, the State Audit Institution and the Commissioner for the Protection of Equality. By constantly improving the control instruments, we remain committed to further strengthening the democratic order.

STRENGTHENING SOCIAL AWARENESS IN THE FIELD OF FIGHT AGAINST CORRUPTION

20 trainings were held for representatives of local self-government units in the field of reporting and verification of assets and conflicts of interest (Belgrade, Vranje, Kragujevac, Kraljevo, Leskovac, Novi Pazar, Novi Sad, Pančevo, Užice, Šabac, Paraćin, Trstenik, Prokuplje, Pirot, Kikinda, Zrenjanin, Pančevo, Sremska Mitrovica, Sombor, Subotica, Ub, Čačak). The trainings were attended by 900 representatives from 119 local self-government units.

In cooperation with the Ministry of Education, Science and Technological Development, and within the EU project for the Republic of Serbia "Prevention and fight against corruption" (IPA 2013), three trainings were held on the topic: "Prevention of conflicts of interest and control of assets and income of officials" intended for education officials. The Training Plan and Program was developed, among other things, on the basis of the analysis of the content of petitions filed by natural and legal persons.

Trainings of political entities in the field of reporting and the manner of submitting annual financial statements and reports on election campaign expenses were held.

Seminars were held for commercial banks regarding legal obligations and the manner of submitting information and data at the request of the Agency.

An Agreement on Cooperation was signed with the Human Resources Management Service of AP Vojvodina and training on ethics and integrity was conducted for employees in provincial bodies, which was attended by 20 participants;

Organized by the National Academy of Public Administration, three trainings on ethics and integrity of employees in the public sector were conducted, which were attended by 60 participants.

Two five-day trainings for trainers in the field of ethics and integrity were held, at which 30 employees in various public sector institutions were trained to independently conduct training on ethics and integrity.

The distance learning course (online training) on ethics and integrity in the public sector was enrolled by 166 participants, of whom 88 successfully passed the knowledge test and received a certificate of participation.

RESEARCH AND COLLECTED DATA ANALYSIS

Importance

Corruption research is an active process aimed at discovering, interpreting and clarifying facts, while the collected data analysis corresponds to the phase of identification and interpretation of collected data, which can be combined to examine the causes that led to corrupt behavior.

Activities and results

Law on the Anti-Corruption Agency prescribes that the Agency organizes research on the situation of corruption and the fight against corruption, monitors and analyzes statistical data, performs other analyzes and research and proposes changes in the manner of keeping statistical data of importance for monitoring the situation of corruption.

Based on the conducted research and analyzes on issues related to the situation of corruption in the Republic of Serbia, the Agency prepares reports that **contribute to presenting to the public in**

an objective way the situation in the field of corruption, as well as the role and activities of the Agency aimed at its suppression.

The Agency conducts sectoral, intersectoral and comparative research and analysis, based on which, for the needs of the Agency as a whole, i.e. specific organizational units, it can point out trends and correlations concerning certain areas of the Agency's competence, thus contributing to more effective work.

When selecting the research and analysis conducted by the Agency during 2019, all relevant data in the field of corruption in the Republic of Serbia were taken into account, including the data presented in the Corruption Perceptions Index (CPI) for 2018, as the most recognized global ranking of countries by the perception of corruption in the public sector, and data from the 2018 report for Doing Business 2019 list of the World Bank, which measures certain business conditions.

Key research and analysis conducted by the Agency during 2019

- **Comparative legal research and analysis of MPs codes of ethics**

This comparative legal research covers six countries in which the issue of ethical conduct of MPs is specifically regulated by parliamentary codes of ethics, four of which are EU members (France, Germany, the United Kingdom and Poland), and two from the Western Balkans, with adopted codes of ethics (Montenegro and Bosnia and Herzegovina). Also, an overview of five countries in which the rules of conduct for MPs regarding ethics are defined by the rules of procedure of parliaments (Austria, the Czech Republic, Finland, Italy and Sweden) is given. The analysis also covered the issue of ethical behavior in the European Parliament.

As for the Republic of Serbia, the National Assembly did not adopt a code of ethics for MPs, but the standards regulating the ethical conduct of MPs are prescribed by the Law on the National Assembly, the Law on the Anti-Corruption Agency and the Rules of Procedure of the National Assembly.

- **Comparative legal research of the position of anti-corruption bodies according to the anti-corruption regulations of countries in the region**

The aim of the research is to compare the position of the Anti-Corruption Agency with the positions of anti-corruption bodies of countries in the region.

The first anti-corruption laws in the observed countries in the region (Slovenia, Croatia, Montenegro, Northern Macedonia and Serbia) were passed in the first decade of this century, during two years, between 2002 and 2004, with the exception of Croatia, where the first anti-corruption law was passed in 1998. All the laws originally passed have undergone multiple amendments over time, which culminated in all the observed countries with the periodic change of entire laws.

The adoption of anti-corruption laws in the observed countries in the region was accompanied by the establishment of anti-corruption bodies, which, with certain changes in position and competencies, are still in force today.

By the legal status that the observed bodies have in the legal system of their countries, the manner of providing funds for work and deciding on the disposal of funds, as well as by the body that is the founder and oversees the work, the position of anti-corruption bodies in these countries is uniform, with the exception of complex establishment procedure in Slovenia.

In Slovenia, Croatia and Northern Macedonia, anti-corruption bodies are defined as multi-member collective bodies in one instance, while certain deviations in composition and decision-making exist in the agencies of Montenegro and, in particular, Serbia.

With certain deviations, caused by the specifics of the position of anti-corruption bodies and the intentions of each individual legislator, the competencies of the observed anti-corruption bodies are mostly the same. The above anti-corruption bodies conduct mostly one-instance procedures, with the exception of the Anti-Corruption Agency, with two-instance decision-making procedure.

- **Research and analysis “Specifics and forms of corruption in the Republic of Serbia”**

Data from this research and analysis, conducted for the period from 2009 to 2015, unequivocally indicate that the number of those who believe that the judiciary should play a key role in combating corruption is growing (for example, a slight increase from 37% to 41%), and especially that this role should be played by independent control institutions, primarily the Anti-Corruption Agency (from 26% to 39%), the Ombudsman (from 2% to 8%) and the Commissioner for Information of Public Importance (from only 1% to 4%). All this may be a consequence of greater recognition of the work of these institutions, as evidenced by the fact that, for example, the recognition of the Anti-Corruption Agency was constantly growing from 2010 (60%) to 2015 (86%). Based on the published results of the work of this institution (for example, an increased number of procedures for determining violations of the law, resolving conflicts of interest, requests for initiating misdemeanor proceedings and criminal charges), it was concluded that this increase in work productivity is adequately reflected in public opinion as well.

- **Research and analysis “Tendency of violations of the law in the field of prevention of conflicts of interest and incompatibility of functions according to the final decisions of the Agency”**

The subject of research and analysis are data related to the measures of public announcement of the recommendation for dismissal from public office and the measures of public announcement of the decision on violation of the Law on the Anti-Corruption Agency in proceedings conducted by the Department for Conflict of Interest and Lobbying.

The research and analysis included published decisions on these measures made in the period from November 2010 to October 2019. Statistical data were observed on an overall as well as on an annual basis.

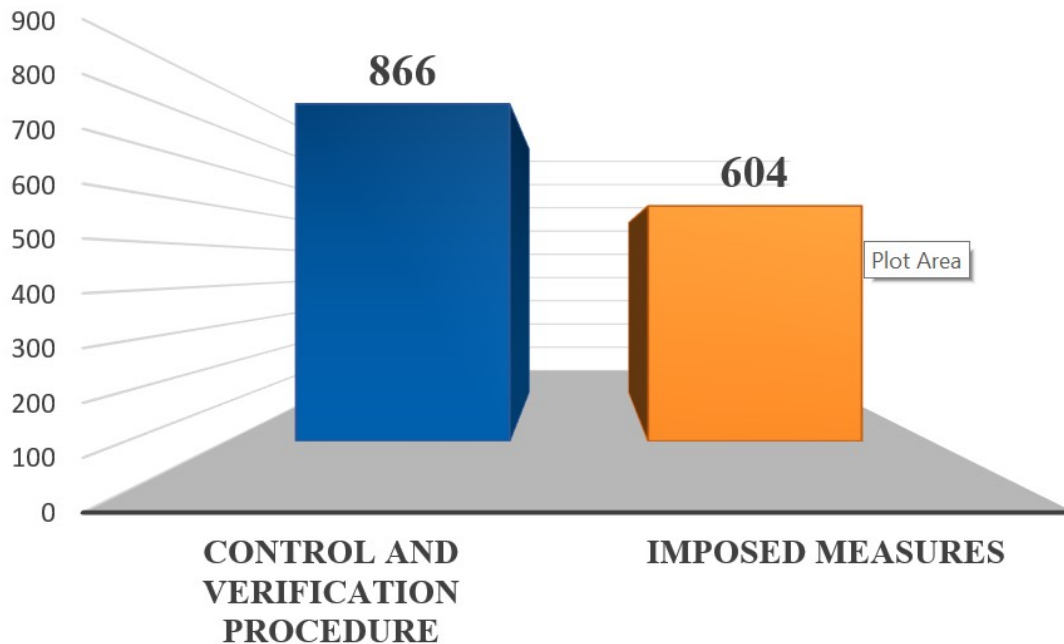
The research and analysis did not include the decisions of the Department imposing a warning measure, the decisions stating the termination of public office under Article 28 of the Law on the Anti-Corruption Agency, as well as the decisions in which the proceeding was suspended.

In the period from November 2010 to October 2019, the Department conducted a total of 565 proceedings against public officials, in which officials were issued a measure of public announcement of a recommendation for dismissal from public office or a measure of public announcement of a decision on violation of the Law on Anti-Corruption Agency. Out of that number, measures of public announcement of the decision on violation of the Law were imposed to public officials in 347 proceedings (61% of the total number of proceedings in which the measure of public announcement of dismissal, i.e. measure of public announcement of the decision on violation of the Law on Agency) and in 218 proceedings the measure of public announcement of the recommendation for dismissal from public office was imposed on public officials (39%). Having in mind the legal coverage of directly elected public officials, as well as the fact that a number of public officials terminated their functions before or during the procedure for imposing a measure, a higher percentage of measures of public announcement of a decision on violation of the Law on Agency than those for dismissal from public office is understandable.

CONCLUSION

As a body with a preventive function in combating corruption, **during 2019**, we faced numerous cases of violation of the provisions of the Law on the Agency.

In matters of verification of assets, conflicts of interest, control of financing of political activities and other cases for which we are exclusively competent, due to violation of the provisions of the Law on the Agency, we initiated a total of **866 proceedings¹¹** and **imposed 604 measures**. The remaining proceedings are ongoing.

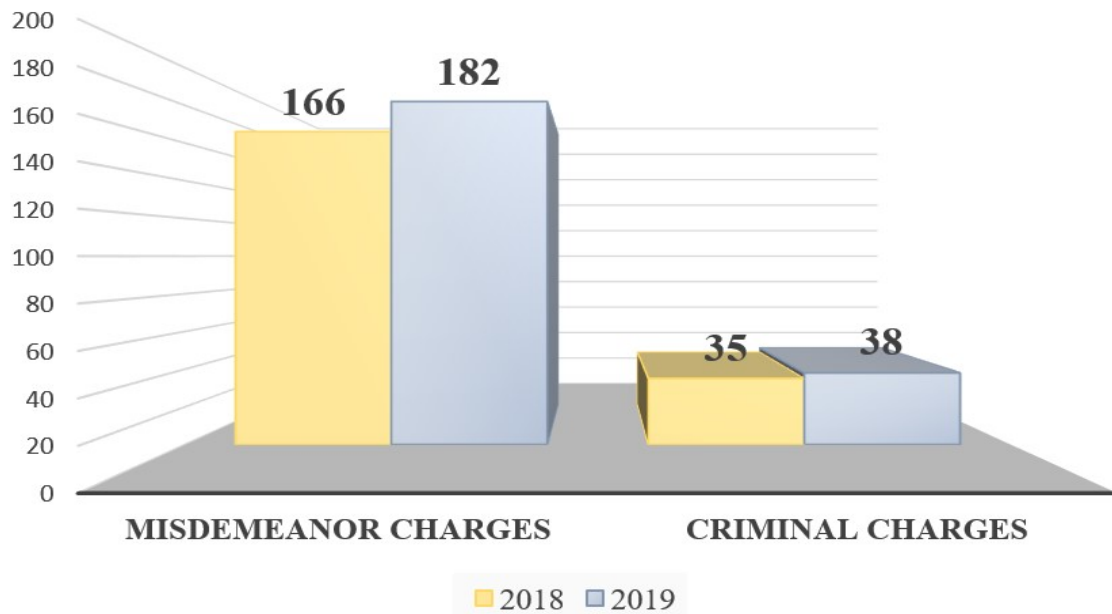


Sincerely committed and active in building a strong anti-corruption framework in the Republic of Serbia, which will strengthen the trust of citizens in the work and integrity of institutions and those who represent them, during our actions in 2019, we also filed against officials, legal entities and responsible persons in the legal entity **182 requests for initiating misdemeanor proceedings and 38 criminal charges or reports to the competent prosecutor's offices** due to the existence of grounds for suspicion of committing a criminal offense, which is more than the number of charges filed in 2018.

COMPARATIVE OVERVIEW OF FILED CHARGES FOR 2018 AND 2019

As a contribution to the decisive fight of the Republic of Serbia against all forms of corruption, we are ready to **continue** to promote activities aimed at raising awareness of responsible and legal behavior of public office holders, as a basis for their personal integrity.

¹¹ We have stated the structure of proceedings in the part of the Annual Report entitled Tabular presentation of the Agency's activities and results.



RECOMMENDATIONS

- Adopt the Law on Amendments to the Law on Financing of Political Activities so as to prescribe **appropriate sanctions for all acts prohibited by law for which neither misdemeanor nor criminal liability is provided.**
- Adopt the Law on Amendments to the Law on Political Parties, to **define the concept of a group of citizens** and all controversial issues arising from that concept.
- When **drafting a new strategic document for the fight against corruption 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 action plans for its implementation for 2013-2018.
- Consider the possibility of enacting a law that will prescribe **the obligation of competent institutions** (at all levels of government) to **appoint ethics and integrity officers**, in accordance with the Guidelines and recommendations for the introduction of ethics and

integrity officers in public administration of the Republic of Serbia¹², derived from the Action Plan for the Public Administration Reform Strategy for the period 2018–2020.

- **Undertake all activities** provided by the Law on Prevention of Corruption in connection with the election of members of the Council, **in order for the Council to start its work in a timely and uninterrupted manner**, on the day of the beginning of the application of this Law.
- **Provide funds and appropriate IT equipment**, as a basis for improving efficiency and effectiveness in the work of the Agency.
- **Provide appropriate infrastructure conditions**, in accordance with increased staffing capacity of the Agency.
- **Appeal to the authorities**, primarily local self-government units, to act upon the initiatives of the Agency for dismissal of public officials.
- **Include training on ethics and integrity into Special Employee Professional Development Programs**, in accordance with the Law on Civil Servants, the Law on Employees in Autonomous Provinces and Local Self-Government Bodies, and the Law on Prevention of Corruption in State Administration and Local Self-Government Bodies.
- **Provide organizational and personnel preconditions** in public authorities, with the aim of developing and implementing an integrity plan in the next cycle, in accordance with the Law on Prevention of Corruption, as well as guidelines and handbook developed by the Agency.

¹² Available on the Agency's website, at the following link: <http://www.acas.rs/podrska-uspostavljivanje-eticke-infrastrukture-u-javnoj-upravi-republike-srbije/>

TABULAR OVERVIEW OF ACTIVITIES AND RESULTS

ACTIVITIES OF THE AGENCY BOARD

The structure of first instance decisions on which the Board decided upon appeal	Number
Measure of public announcement of the recommendation for dismissal from public office	24
Measure of public announcement of the decision on violation of the Law on the Agency	16
Decision establishing the violation of the law and imposing the official a warning measure obliging to act in a certain manner	15
Decision on rejection of the request for giving consent for holding another public office	13
Decision on rejection of the request for giving consent for performing another job along with a public office	12
Decision determining the violation of Art. 28 of the Law on the Agency (simultaneous holding of several public offices without the consent of the Agency) and termination of public office by force of law	7
Decision rejecting the request for giving consent for holding another public office as untimely	6
Decision rejecting the request for giving consent for the establishment of an employment relationship or business cooperation upon termination of public office	5
Decision on notifying an official about the performance of another job or activity which determines the conflict of interest and obliges the official to cease performing that job or activity	5
Decision rejecting the official's appeal as untimely	2
Decision on rejecting the proposal for restitution	2
Decision on rejecting the proposal for restitution as untimely	1
Decision on correction	1
Total	109

Decisions of the Board	Number
Appeals rejected	101
First instance decisions annulled	4
First instance decisions partially annulled	2
Supplement to the proceeding	2
Total	109

Decisions of the Administrative Court	Number
Lawsuits rejected	29
Lawsuits approved	6
Proceeding suspended	1
Lawsuit dismissed	1
Total	37

ADMINISTRATIVE COURT ACTING UPON THE DECISIONS OF THE AGENCY'S BOARD

PUBLIC OFFICE		FIRST INSTANCE DECISION CONFIRMED BY THE BOARD IN THE SECOND INSTANCE PROCEDURE		DECISION OF THE ADMINISTRATIVE COURT
		ESTABLISHED VIOLATION OF THE LAW/OTHER DECISION	IMPOSED MEASURE	
1.	City Assembly Member	Decision establishing the violation of Art. 2 pairs. 4 of the Law on the Agency (failure to submit a request for consent to hold another public office of a member of the city council)	Termination of the other public office by force of law	Verdict rejecting the claim
2.	General Manager of the company	Decision rejecting the request for giving consent for performing another public function of a member of the City Assembly, as untimely	-	Verdict rejecting the claim
3.	Former Municipal President	Decision establishing the violation of Art. 27, para. 2 and 3, Art. 32. Para. 1. and Art. 35. para. 1 of the Law on the Agency (nepotism and failure to inform the Agency about conflict of interest as well as non-transfer of management rights in the company)	Measure of public announcement of the decision on violation of the Law on the Agency	Verdict rejecting the claim
4.	Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency (nepotism and failure to inform the Agency about conflict of interest)	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
5.	Member of the Municipal Assembly	Decision establishing that the public official failed to act upon the imposed warning measure within the given deadline and cease to simultaneously hold the public offices of alderman and the president of the local community council.	Measure of public announcement of the decision on violation of the Law on the Agency	Verdict rejecting the claim
6.	Member of the High School Council	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency (nepotism and failure to inform the Agency about conflict of interest)	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
7.	Member of the Steering Board of the Republic Health Insurance Fund Belgrade	Decision establishing the violation of Art. 27, para. 2, of the Law on the Agency, in connection with Art. 219, para. 5. Law on Health Insurance, for performing the duty of Deputy President of the Association of Pensioners of Serbia	A warning measure and an obligation to stop holding public office and duty at the same time	Verdict rejecting the claim

8.	Member of the Municipal Council	Decision establishing the violation of Art. 31, para. 1, of the Law on the Agency due to non-reporting job in a company and violations of Art. 27 and 32, para. 1 of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
9.	Assistant Director of the Tax Administration, Tax Police Sector, Chief Inspector	Decision establishing the violation of Art. 27, para. 1, 2 and 3 and Art. 32 para. 1 of the Law on the Agency for performing additional job as a lecturer at the faculty where the tax administration exercised control	Measure of public announcement of the decision on violation of the Law on the Agency	Verdict rejecting the claim
10.	Member of the City Council	Decision rejecting the request for giving consent for holding the public office of a member of the supervisory board of the company	-	Verdict rejecting the claim
11.	Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
12.	Deputy Secretary of the Republic Election Commission	Decision rejecting the request for giving consent for work in the position of Secretary General of the Ministry	-	Verdict rejecting the claim
13.	Member of the Municipal Assembly	Decision establishing the violation of Art. 27, para. 2 and 3 of the Law on the Agency for performing the duty of the president of the local community council	A warning measure and an obligation to stop holding public office and duty at the same time	Verdict rejecting the claim
14.	Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
15.	Member of the Municipal Assembly	Decision establishing the violation of Art. 27, para. 2 and 3 and Art. 32 para. 1, of the Law on the Agency for performing the duty of the president of the local community council	A warning measure and an obligation to stop holding public office and duty at the same time	Verdict rejecting the claim
16.	Grammar School Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
17.	Dean	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim

18	Director of the School of Economics and Trade	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
19	Director of a public city transport company	In conclusion, the proposal to repeat the proceeding was rejected	-	Verdict rejecting the claim
20	Member of the city election commission	Decision rejecting the request for giving consent for holding another public office of the head of the city council affairs service	-	Verdict rejecting the claim
21	City Assembly Member	Decision rejecting the request for giving consent for holding another public office of a member of the executive board of a company	-	Verdict rejecting the claim
22	MP	Decision rejecting as untimely the request for giving consent for holding another public office of the President of the Municipal Assembly	-	Decision on suspension of the procedure due to withdrawal of the claim
23	Director of a special hospital	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
24	Acting Director of a special hospital	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
25	Member of the Municipal Assembly	Decision establishing the violation of Art. 27, para. 2 and 3 of the Law on the Agency for the simultaneous holding of the public office of the director of a secondary school	Warning measure and an obligation to cease holding the offices at the same time	Verdict rejecting the claim
26	Member of the University Council	Decision establishing the violation of Art. 35, para. 1 of the Law on the Agency due to non-transfer of management rights in companies	Warning measure with the obligation for the official to comply with the provisions of the Law on the Agency in the future	Verdict rejecting the claim
27	Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
28	City Assembly Member	Decision establishing the violation of Art. 28, para. 4, of the Law on the Agency due to non-submission of the request for giving consent for holding another public office of the Executive	Termination of the other public office by force of law	Verdict rejecting the claim

		Director-member of the Executive Board of the company		
29	Primary School Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
30	Secondary School Principal	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the recommendation for dismissal from public office	Verdict rejecting the claim
31	Former High School Director	Decision establishing the violation Art. 2, para. 2 of the Law on the Agency	Measure of public announcement of the decision on violation of the Law on the Agency	Verdict upholding the claim (The Board rejected the appeal in the repeated proceedings)
32	General Manager of the company	Decision rejecting the request for giving consent for holding another public office of a member of the supervisory board of a company - joint stock insurance company	-	Verdict upholding the claim (The Board adopted the appeal in the repeated proceedings)
33	Former Acting Director of the Tax Administration	In the repeated procedure, the request for giving consent for the preparation of an expert opinion in the criminal proceeding is rejected	-	Verdict upholding the claim (The Board rejected the appeal in the repeated proceedings)
34	Acting Director of the company	Conclusion rejecting the request for giving consent for holding another public office of a member of the board of directors of a company as untimely and a conclusion rejecting as unfounded a proposal for restitution	-	Verdict upholding the claim (The Board rejected the appeal in the repeated proceedings)
35	Member of Parliament and councilor-president of the municipal assembly	Decision establishing the violation of Art. 27, para. 2, of the Law on the Agency in connection with Art. 33, para. 2 of the Law on Sports for holding duties in sports organizations	The official undertakes to cease holding public offices and duties in sports organizations at the same time	Verdict upholding the claim (The Board rejected the appeal in the repeated proceedings)
36	Alderman and former president of the municipal assembly	Decision establishing the violation of Art. 27 and 32, para. 1, of the Law on the Agency	Measure of public announcement of the decision on violation of the Law on the Agency	Verdict upholding the claim (The Board rejected the appeal in the repeated proceedings)

37	President of Municipal Assembly	Decision rejecting the request for giving consent for holding another public office of Deputy Provincial Secretary in the Provincial Government	-	Decision dismissing the claim as incomplete
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OVERSIGHT OF FINANCING POLITICAL ACTIVITIES

In 2019, within the competence of the Department, a total of 62 oversight procedures were initiated.

Number and structure of oversight of the financing of political activities	
Control of election campaign expenses report	30
Control of annual financial statements	32

Due to the violation of the provisions of the Law on Financing of Political Entities, 59 decisions on loss of rights were made.

Number of decision on loss of rights	
Decision on loss of the right to financing from public sources - political parties	41
Decision on loss of the right to financing from public sources - groups of citizens	18

In 2019, a total of **111 proceedings** were initiated for violating the law on financing political activities. Out of the total number of initiated proceedings, **96 requests for initiating misdemeanor proceedings** were filed, and **15 proceedings** were initiated before the Agency against political entities due to violation of the provisions of the Law on Financing of Political Activities.

The structure of the grounds for initiating misdemeanor proceedings	
Failure to submit AFS for 2017	27
Failure to submit AFS for 2018	31
Failure to submit the certified auditor opinion with the AFS for 2016	2
Failure to use at least 5% of the funds received for regular work on an annual basis for professional development and training, international cooperation and work with membership	4
Exceeding of the maximum value of grants in 2017	1
Failure to submit election campaign expenses report during 2017	9
Improper use of funds in 2018	1
Failure to submit election campaign expenses report during 2018	10
Submission of election campaign expenses report in 2018, which do not contain all the data	8
Failure to open a special account to finance the 2018 election campaign	2
Failure to submit data at the request of the Agency	1

Two reports were submitted to the competent prosecutor's offices due to the suspicion that the responsible persons in the political entities committed criminal acts.

CONFLICT OF INTEREST

In 2019, **471 proceedings** were initiated in the field of conflict of interest prevention for violating the provisions of the Law on the Agency.

Initiated verifications and proceedings due to violation of the Law on the Agency	
Holding another public office without the consent of the Agency	159
Using a public office for personal gain	151
Other violations of the law in the field of prevention of conflicts of interest	161

295 measures were imposed for violating the provisions of the Law on the Agency.

Type and number of measures imposed by the Agency	
Warning measure	164
Measures of public announcement of the decision on violation of the law	55
Termination of the oother public office by force of law	35
Measure of public announcement of the recommendation for dismissal	41

In 2019, **a total of ten requests for initiating misdemeanor proceedings** were filed. The Misdemeanor Court in Belgrade issued a total of **36 decisions** based on the requests for initiating misdemeanor proceedings filed before and during 2019.

Structure of decisions of the misdemeanor court	
Convictions	27
Acquittals	1
Decisions on termination of proceedings	6
Dismissals	2

One criminal charge was filed with the competent prosecutor's offices due to the existence of grounds for suspicion of a criminal offense.

ASSETS AND INCOME

In 2019, within the competence of the Department, a total of 74 proceedings were initiated for violation of the provisions of the Law of the Agency..

Verifications and proceedings initiated for violation of the Law on the Agency	
Untimely submission of reports upon taking office	15
Untimely submission of reports upon termination of office	5
Untimely submission of reports on significant changes in assets and income during the term of office	34
Untimely submission of reports on significant changes in assets and income after termination of office	2
Cumulative violations of the provisions of the Law on the Agency	18

Due to violation of the provisions of the Law on the Agency, **63 measures** were imposed.

Type and number of measures imposed by the Agency	
Warning measures	61
Measures of public announcement of the decision on violation of the law	2

In 2019, a total of **ten requests for initiating misdemeanor proceedings** were filed due to untimely submission of reports on assets and income. The Misdemeanor Court in Belgrade made a total of 12 decisions based on the requests for initiating misdemeanor proceedings filed before and during 2019.

Structure of decisions of the misdemeanor court	
Convictions	7
Decisions on termination of proceedings	4
Dismissals	1

During 2019, **11 criminal charges** and reports were submitted to the competent prosecutor's offices due to the existence of grounds for suspicion that the officials did not submit or provided false information about the assets in order to cover up assets

Statistics of actions upon criminal charges and reports filed during and before 2019	
Final suspended sentences	3
Aquittals	2
Second instance verdicts	1
Indictments	2
Evidentiary motions in progress	17
Criminal charges rejected with the application of the principle of opportunity	1
Criminal charges rejected	5
Orders issued to postpone the criminal prosecution with the obligation of the defendant to pay a certain amount of money	1
Proceeding suspended by the competent prosecutor's office due to the withdrawal of the public prosecutor from the criminal prosecution	1

REGISTERS AND RECORDS

In 2019, within the competence of the Department, **259 proceedings** were initiated for violation of the provisions of the Law on the Agency.

Initiated verifications and proceedings due to the violation of the Law on the Agency	
Due to non-submission of the notice on participation in the public procurement procedure	7
Due to untimely delivery of a copy of the gift records	1
Due to untimely submission of reports upon taking office	163
Due to untimely submission of reports upon termination of office	80
Due to a cumulative violation of the provisions of the Law	8

Due to the violation of the provisions of the Law on the Agency, **246 measures** were imposed.

Type and number of measures imposed by the Agency	
Warning measures	230
Measures of public announcement of the decision on violation of the law	16

In 2019, **66 requests for initiating misdemeanor proceedings** were filed. The Misdemeanor Court in Belgrade made a total of **58 decisions** based on the requests for initiating misdemeanor proceedings filed before and during 2019.

Structure of decisions of the misdemeanor court	
Convictions	37
Decisions on termination of proceedings	17
Dismissals	1
Decisions on rejecting the request for initiating misdemeanor proceedings	3

14 criminal charges were filed with the competent prosecutor's offices due to the existence of grounds for suspicion that the officials, in order to cover up assets, did not submit to the Agency or provided false information about their assets.

Statistics of actions upon criminal charges and reports filed during and before 2019	
Final suspended sentences	1
Second instance verdicts	1
Evidentiary motions in progress	13
Criminal charges rejected with the application of the principle of opportunity	7
Criminal charges rejected	4

RESEARCH AND ANALYSIS

In 2019, a total of **15 research and analyses** were conducted within the competence of the Department.

Conducted research and analyzes in 2019	
1.	Comparative legal research and analysis of codes of ethics of people's representatives
2.	Comparative legal research and analysis of doctors' gifts received from patients
3.	Research and analysis "Specifics and forms of corruption in the Republic of Serbia"
4.	Research and analysis "Tendency of violations of the law in the field of prevention of conflicts of interest and incompatibility of functions according to the final decisions of the Agency" (published on the Agency's website)
5.	Analysis of the annual reports of the European Commission on the progress of the Republic of Serbia in the reform process for 2015, 2016 and 2018
6.	Analysis of the annual reports of the Agency for the period 2014-2018 (Department for control of assets and income of officials and petitions, Department for control of financing of political activities, Department for resolving conflicts of interest)
7.	Comparative analysis of two-instance actions within anti-corruption bodies
8.	Review of lobbying in the Republic of Slovenia and in the Republic of Montenegro
9.	Comparative study of CPI fluctuation in the period 2012–2018
10.	Analysis of the Global Corruption Barometer
11.	Analysis of shortcomings and limitations of the World Bank's Doing Business list in measuring the perception of corruption
12.	Comparative legal research of regulations regulating the official's campaign
13.	Analysis of GRECO recommendations
14.	Comparative legal research of sanctions policy in the laws on prevention of corruption in the countries of the region
15.	Comparative legal research of the position of anti-corruption bodies according to the anti-corruption regulations of the countries in the region

IMPROVING THE AGENCY'S PROFESSIONAL CAPACITY

Participation of employees in **trainings conducted by the National Academy of Public Administration**. In 2019, within the competence of the Department, a total of **27 trainings** were conducted to improve the professional staff of the Agency.

TRAINING		Number of held trainings	Number of employees
1.	Protection of personal data, novelties in legislation	3	8
2.	Analysis of job descriptions and determination of competencies of civil servants	1	1
3.	Training of managers of narrow internal units	1	1
4.	Regulations and procedures in the field of employment of civil servants	2	4
5.	Training of trainers for the needs of administrative procedures optimization training	1	1
6.	Competence-based personnel selection procedure - methods and techniques	4	6
7.	Lecturer training - basic level	3	5
8.	Public procurement - planning and implementation	1	1
9.	Communication and conflict resolution skills	1	1
10.	Written communication in administration	2	4
11.	Managing an efficient team	2	3
12.	Protection of human rights - Ombudsman	1	1
13.	Development of a rulebook on internal organization and systematization of jobs	1	1
14.	Public policies - creation, implementation and analysis of effects	1	1
15.	Project cycle management	1	1
16.	Whistleblower protection	2	2
17.	The role of HR units in the orientation of officials in the position upon taking office	1	1
18.	Information and communication	1	2
19.	Public speaking and presentation skills	1	1
20.	Performance evaluation	2	2
21.	Spreadsheets	1	1
22.	Integrated competence-based human resource management	1	1
23.	Financial management and control	1	2
24.	Conflict resolution and stress management	1	1
25.	Continuing professional development program for civil servants	1	1
26.	Mid-term planning	1	1
27.	Monitoring and reporting in the program budgeting process	1	1

TRAINING OF EMPLOYEES IN ACCORDANCE WITH THE PROFESSIONAL TRAINING AND ADDITIONAL EDUCATION PROGRAM

In 2019, a total of 16 trainings for employee training were conducted in accordance with the Program of Professional Development and Additional Education.

TRAINING		ORGANIZER	No. of employees
1.	Budget accounting	Institute of Economics and Law	2
2.	Leadership program	US Embassy in Serbia	1
3.	Data analysis tools - Pivot tables	Chamber of Commerce of Serbia	4
4.	Specialist training - Open databases	OSCE	4
5.	Preparation of annual financial statements	IPC	1
6.	Proactive investigations of corruption cases, financial fraud and economic crime	US Department and OSCE	1
7.	Specialist training - Special evidentiary motions	OSCE, MoI	2
8.	Specialist training – Proving corrupt crimes	OSCE, MoI	2
9.	XIII Annual Conference of Budget Users	Obrazovni Informator	2
10.	Communication skills and stress management	OSCE	2
11.	Knowledge and application of the Law on Protection of Whistleblowers	IPA 2013	1
12.	Lobbying as a measure to prevent corruption	OSCE	15
13.	Training for trainers Lobbying Law	US Department of Justice and OSCE	11
14.	Matra Rule of Law Training Program – “Public Finance Management”	Helsinki Committee, Leiden Law School and The Hague Academy for Local Governance	1
15.	Training for assertive communication	OSCE	4
16.	Public procurement workshop	Commission for Protection of Competition	3

**AGENCY'S BUDGET PROGRAM STRUCTURE AND BUDGET EXECUTION FOR
2019**

No	Program activity	Project	Budget	Source of financing
1.	Prevention of corruption and control for prevention of corruption		234.262.000,00	01 - revenues from the budget
2.		Training in the field of fight against corruption	1.194.000,00	01 - revenues from the budget
3.		Public awareness raising	0,00	01 - revenues from the budget
4.		Gathering information from alternative sources about the situation in the fields envisaged by the strategic framework for combating corruption	585.000,00	01 - revenues from the budget
5.		Control of integrity plans implementation	500.000,00	01 - revenues from the budget
6.		Grants to civil society organizations	1.500.000,00	01 - revenues from the budget
7.		IPA 2013 - Prevention and fight against corruption	14.506.849,52	56 - EU financial support
			2.069.000,00	01 - revenues from the budget
Total:			254.616.849,52	

**2018 BUDGET EXECUTION ACCORDING TO THE PROGRAM
BUDGET**

Program Activity: 0007 Prevention of corruption and control for prevention of corruption

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
411	Salaries for employees	122.022.000,00	120.677.045,13	98,90
412	Social contributions on earnings	21.423.000,00	20.696.113,17	96,61
413	In-kind compensation	620.000,00	538.120,00	86,79
414	Social contributions to employees	3.490.000,00	599.839,49	17,19
415	Transport compensation	4.040.000,00	2.720.851,95	67,35
416	Benefits to employees and others special expenses	650.000,00	478.557,53	73,62
421	Fixed costs	5.370.000,00	4.275.164,18	78,24
422	Travel expenses in the country and abroad	3.880.000,00	3.201.148,89	69,74
423	Contracted services - total	33.597.000,00	33.551.114,48	99,86
425	Regular repairs and maintenance	5.010.000,00	3.844.023,13	76,73
426	Material	2.880.000,00	2.408.495,09	83,63
482	Taxes, mandatory fees, fines and penalties	190.000,00	89.002,00	46,84
483	Fines and penalties by court decisions	150.000,00	16.890,00	11,26
485	Compensation for violation or damage incurred by government authorities	40.000,00	0,00	0,00

512	Machines and equipment	5.900.000,00	4.625.554,15	78,40
515	Intangible assets	25.000.000,00	24.600.000,00	98,40
Total:		234.262.000,00	222.321.919,20	94,90

Project 1: 4002 - Training in the field of fight against corruption

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
421	Fixed costs	94.000,00	0,00	0
422	Travel expenses in the country and abroad	500.000,00	312.436,52	62,48
423	Contracted services	600.000,00	600.000,00	100,00
Total:		1.194.000,00	912.436,52	76,41

Project 2: 4004 - Raising public awareness

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
423	Contracted services	0,00	0,00	0,00
Total:		0,00	0,00	0,00

Project 3: 4005 - Gathering information from alternative sources about the situation in the fields envisaged by the strategic framework for combating corruption

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)
422	Travel expenses in the country and abroad	285.000,00	0,00
423	Contracted services	300.000,00	0,00
Total:		585.000,00	0,00

Project 4: 4006 - Control of the integrity plans implementation

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
422	Travel expenses in the country and abroad	500.000,00	88.468,98	17,69
Total:		500.000,00	88.468,98	17,69

Project 5: 4007- Grants to civil society organizations

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
481	Donations to non-governmental organizations	1.500.000,00	1.413.175,62	94,21
Total:		1.500.000,00	1.413.175,62	94,21

Project 6: 7004 - IPA 2013 Prevention and Fight against Corruption

Economic classification	Budget position	Planned (in RSD)	Expenditure (in RSD)	Percentage (%)
423	Contracted services – source 01	1.724.000,00	766.297,41	44,44
	Contracted services – source 56	14.506.849,52	14.506.849,52	100,00
485	Compensation for violation or damage incurred by government authorities	345.000,00	0,00	0,00
Total:		16.575.849,52	15.273.146,93	92,14

PUBLIC PROCUREMENTS

In 2019, the Agency conducted a total of **seven public procurement procedures** on the basis of which the following contracts were concluded:

No.	TYPE OF GOODS/SERVICES	PROCUREMENT TYPE	AMOUNT EXCL. VAT	LEGAL ENTITY WITH WHICH THE CONTRACT IS CONCLUDED
1.	Physical-technical and fire security services	Small-value PP	2.168.100,00	JAKUZA d.o.o. Beograd
2.	Mediation services for providing transport, hotel services and space rent	Small-value PP	4.230.000,00	BIG BLUE d.o.o. Beograd
3.	Professional support to the IT system functioning	Small-value PP	3.300.000,00	VLATACOM INSTITUT d.o.o. Beograd
4.	Software purchase services	Open procedure	20.500.000,00	PROZONE d.o.o. Novi Sad
5.	Ongoing maintenance services of the central cooling system of the building and the cooling system of the server room	Small-value PP	1.082.820,00	ENEL PS d.o.o. Beograd
6.	Printing services	Small-value PP	512.597,50	PROTOTYPE d.o.o. Beograd and BIROGRAF COMP d.o.o. Beograd
7.	Procurement of official vehicle	Small-value PP	1.555.925,00	HYUNDAI SRBIJA d.o.o. Beograd

AGENCY'S ACTION RESULTS

Total number of initiated control and verification procedures, imposed measures, filed criminal charges, reports and requests for initiating misdemeanor proceedings at the level of the Agency for 2019.

Overall results of the Agency for 2019		
1.	Control and verification procedures	866
2.	Imposed measures	604
3.	Misdemeanor charges	182
4.	Criminal charges and reports	38