

# Strategy for the period 2022-2030

## Transparency Serbia, 2021

***Transparency International** is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.*

***Transparency Serbia** is a full member of the global movement Transparency International with the vision of Serbia as a country where corruption has been reduced to a level that does not significantly threaten the realization of public interest, business relations, the political life of the country, the rule of law, the building of stable ethical and cultural values of society, health, safety and well-being of citizens and occupying the desired position in the European and world community of peoples.*

***The strategic framework of the association Transparency Serbia (TS) for the period 2022 - 2030** is based on the vision and mission of TS. The strategic framework derives from the global anti-corruption Strategy of the global movement Transparency International, with which it is aligned, national documents, analysis of the state of corruption and the fight against corruption in the Republic of Serbia, and the circumstances in which TS is trying to achieve the goals for which it was founded.*

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## Description of the current situation and trends

Even though there was a favourable environment for better results in the fight against corruption during the last two decades, progress has been achieved almost exclusively at the level of normative and institutional solutions, as well as in terms of citizens' awareness of various forms of corruption. Moreover, the situation has worsened in many areas.

On the global ranking of Transparency International's corruption perception index, Serbia has stagnated or recorded minimal oscillations, for more than a decade, while the rating Serbia has is not only far behind the average of the EU and the whole of Europe, but has not even reached the global average. Other international reports give similar evaluations. This fact is all the more worrying because all that time the fight against corruption was considered one of the priorities of the authorities in the Republic of Serbia, that it was one of the key priorities according to the opinion of the citizens of Serbia, and that numerous international organizations that monitor the situation in Serbia were ready to help implement reforms.

A favourable environment for the fight against corruption was not used to create a system that would enable the prevention, suppression and punishment of corruption. On the contrary, many of the fragile mechanisms for democratic control of government have weakened over time. Citizens and businessmen who are ready to point out cases of corruption and violations of anti-corruption preventive regulations or systemic problems of corruption, as well as non-governmental organizations and the media that investigate these phenomena, do not receive encouragement from state authorities to do so, which would primarily be reflected in timely and adequate reaction - examination of individual cases of suspected corruption and elimination of its systemic causes. Instead, they often suffer harmful consequences, and the absence of a timely and adequate reaction encourages the continuation and spread of corrupt practices.

The media scene is deeply divided, and it is dominated by those who are not ready to critically examine the Government's moves, especially regarding TV stations and daily newspapers with the largest audience. The media and organisations that cast doubt on the actions of authorities and public officials or report on possible corruption in practice are treated as political opponents of the Government, which was particularly visible in the years when there was no opposition in the parliament. Officials of the executive and legislative authorities and the pro-government media treated similarly the leaders of independent state bodies in periods when they, acting within their competence, pointed to the omissions of officials or disputed decisions of the authorities, especially when they actively promoted such views in the public.

The interest of international organisations in reforms has not been adequately utilised, not only because many of their recommendations are accepted with significant delay but also because a formalistic approach prevails during their acceptance. Moreover, when amending laws, state authorities often reject sound proposals from national actors by limiting the scope of legislative intervention to the fulfilment of international organisations' proposals, or by stating that the law is already "harmonised" with EU and other international standards.

Serbia is experiencing a long delay in fulfilling GRECO's recommendations from the Fourth Round of Evaluation (judiciary and parliament), and is yet to receive recommendations from the Fifth Round, which could have far-reaching significance as they will relate to the suppression of corruption at the top of the executive power and the police. At the same time, it is already obvious that the recommendations related to the Parliament have not been used in the best way, which can be seen in the examples of the Law on Lobbying and the Code of Conduct for Members of Parliament, but also in the proposals for certain constitutional solutions for the judiciary that do not provide sufficient guarantees of independence, transparency and accountability, although they have the potential to improve the situation.

Key recommendations of the European Commission are repeated year after year, while assessments of "limited progress", when there are any, are generally not the result of essential systemic changes. Similarly, election-related regulations are not changed based on a broad consultative process and significantly before the next election, but also while the election campaign is already underway. Numerous ODIHR recommendations of importance for financing the campaign in accordance with international standards and preventing the misuse of public resources for the purpose of the election campaign remained essentially unresolved.

The centralisation of political power, especially since 2014, opened a fast lane for reforms where political will existed, in contrast with the previous more than a decade long period of fragile coalitions, that slowed down both legislative reforms and implementation of policies. That resulted in the adoption of several acts in the field of the fight against corruption both in the National Assembly and by the Government. At the same time, several unforced extraordinary parliamentary elections were held, after which there was an unnecessarily long wait for the formation of the government, which hampered legislative work. On the other hand, the centralisation of power resulted in a significant weakening of the system of responsibility for implementing adopted laws and public policies, the institutional system of checks and balances and the rule of law as a whole. The end result is stagnation or deterioration in the ratings of the perception or state of corruption and a number of related areas.

The first factor that leads to an unsatisfactory situation in the area of the fight against corruption is the insufficient importance given to it, even declaratively, where the deterioration has been noticeable over time. Among the most visible indicators are the absence of a national strategy for fight against corruption since 2018 and the decreasing degree of prioritisation that the fight against corruption has in the programmes of the Government of Serbia (e.g. 2022 and 2020 compared to 2016 and 2014).

During the period of validity of the previous Strategy, although the Agency for the Fight Against Corruption (now the Agency for the Prevention of Corruption) prepared quality reports on the implementation, those reports were not the subject of discussion in the institutions, and even less the determination of responsibility for omissions. Similarly, despite numerous delays, there was no accountability for breaching the anti-corruption commitments from Chapter 23 Action Plan of the negotiations with the EU. Open disregard of anti-corruption rules by the very top of the executive power has far-reaching and severe consequences for the entire system of the fight against corruption, which is most visible in the examples of unimplemented professionalisation in the management of public enterprises and state administration despite unambiguous legal obligations.

Similarly, the coherence of the anti-corruption system is threatened by awarding the most valuable government contracts without competition based on state-to-state agreements or special laws.

The process of decision-making in many cases of significant public interest was non-transparent, and channels of external influences remained unknown, despite the 2018 lobbying legislation. In addition, the problem is that, according to the publicly presented information, important decisions are not made by the government and other authorised bodies that formally vote on them, but by the President of the Republic, leader of the strongest political party (2012-2023) and bearer of all party's electoral lists even after he officially relinquished party leadership. The non-transparent reasons for making decisions led to suspicions of corruption within the executive and legislative authorities and in the judiciary (for example, sudden changes in general legal positions in certain cases of great importance).

The ability of citizens to initiate or influence regulations and decisions is limited by the lack of readiness of authorities to properly consider their proposals submitted within the legislative public debates or to open a consultative process at all. Popular initiatives submitted to the Parliament are ignored. Regarding the impact on public expenditure priorities and the budget, the consultation mechanism does not even formally exist at the central level.

Non-compliance with access to information rules includes widespread practice of ignoring or rejecting without justification of requests for information, but also failure to enforce several hundred of binding orders of the Commissioner for Information of Public Importance to disclose information every year. Legal protection of the right to access data from the seven highest state authorities is completely ineffective (administrative dispute before the Administrative Court). Most of public institutions fail to pro-actively publish all information even when the law obliges them to do so and in particular to publish such information in an open data format. All these factors significantly contribute to the non-transparency of decision-making and the work of authorities and reduce their accountability.

Supervision over implementing numerous preventive anti-corruption rules is inadequate regarding the number of controlled entities and the frequency and scope of the controls. When one adds to this insufficient cooperation between state authorities in using the results of the conducted controls, it is unsurprising that the desired effects of the prescribed obligations are also absent. Weaknesses in supervision can only partly be attributed to insufficient capacities of state authorities, identified in almost all areas, but much more to the practice of "self-censorship" when dealing with "sensitive" cases. One of the indicators of insufficient capacities is the unfilled positions based on the existing acts on systematisation, where those acts do not consider the need for significantly more intensive supervision.

Things are similar when it comes to prosecuting corruption and investigative bodies' capacities and methods of action. Although some whistleblowers have received judicial protection, there is no systematic monitoring of what happens to their reports. In this way, the primary motive for raising the alarm - solving the problem - is jeopardised. Public prosecutors' offices and other state bodies do not act proactively enough, and even those suspicions of corruption that are well documented and made public, including the reports of the Government Council for Combating Corruption, remain unexamined.

Since plea agreements were introduced and four specialised anti-corruption departments established in 2018, there have been evident improvements in the speed of solving corruption cases. However, the number of reported cases, indictments and verdicts has not significantly increased but even dropped. International and Serbian organisations and media particularly point to a very small number of indictments and verdicts related to persons in high positions, the imposition of inadequate penalties and the failure to confiscate property acquired through corruption.

When it comes to the repression of corruption, in addition to insufficient proactivity, there are also problems with definitions of certain criminal offences, inadequate division of responsibilities among the prosecutor's offices, indications of political influence in investigation and prosecution of some instances of possible corruption, the overload of prosecutors in charge for combating corruption due to the prosecution of other criminal acts, disclosure of information on the prosecution of corruption by unauthorised persons, long duration of court proceedings, as well as insufficient publicity of data when the proceedings end with a plea agreement.

## The previous strategic framework and its further development

### History

Transparency International has been fighting against corruption at a global level for more than thirty years now. However, corruption keeps eating into political, economic and social life, and assumes new shapes and forms, parallel to development of anticorruption instruments.

Transparency Serbia is a domestic non-governmental organization, established and registered as an association (of citizens) according to the regulations of the Republic of Serbia, and at the same time a full member of the international organization Transparency International, whose international secretariat is based in Berlin, FR Germany. Transparency Serbia was formed and started working in the period after the regime change and the lifting of international sanctions in Serbia, when the preconditions were created to start a comprehensive fight against corruption through institutional and systemic reforms.

Transparency Serbia is recognized by the domestic and international public, by state authorities, business, media, experts, professional associations and citizens, as an organization that gives a competent and impartial judgment on the issue of anti-corruption policy in Serbia and that points to ways to improve that policy.

Corruption in Serbia is a serious social problem. This is indicated by the views of citizens and businessmen, the declared program priorities of state bodies and political parties, and the analyzes of relevant international organizations. The actual extent of corruption cannot be fully determined, because statistical data do not provide a reliable basis for conclusions, due to the large number of dark crime figures and differences in methodology. In the past two decades, citizens have rated corruption as a third or fourth on the list of problems in society (right after poverty, unemployment, political instability and general crime, depending on research). Public opinion researches indicate that citizens believe it to be very widespread in Serbia, but also that such an opinion is less founded in personal experience, and more on the bases of preconceptions and stories of others. These



researches indicate that a large number of citizens won't even report cases of 'petty' corruption, of which they have immediate knowledge. The main reasons for this are the fear of consequences and the lack of faith that anything will be done to solve the problem. Things did not change even after the proclamation of "zero tolerance" in the fight against corruption in the planning documents of the Assembly and the Government of Serbia, nor after the adoption of the Law on the Protection of Whistleblowers and numerous other laws that were adopted on the basis of domestic strategic plans, within the process of negotiations with the EU or recommendations of other international organizations (especially GRECO and ODIHR).

It is even more difficult to establish reliable data on the prevalence of "high-level" corruption. It is indirectly informed by the data obtained on the basis of research into the perception of corruption by foreign businessmen and risk analysts. According to one of those analyzes (Corruption Perception Index - CPI, Transparency International), Serbia is in the group of highly corrupt countries, and there have been no significant changes in the score since 2008. The only change is that other countries have progressed more in the meantime, so Serbia is now in the bottom half of the global list.

Considering the encountered problems and underutilized opportunities to fight corruption in Serbia in a more effective way than before, and taking into account the previous strategy that was only partially implemented, Transparency Serbia established this Strategic Framework, which defines the goals and directions of its activities in the period 2022 - 2030, bearing in mind the general guidelines set by the strategic framework of the Transparency International global network, but also not giving up on the commitments and goals from previous strategic documents where they have not been fully achieved.

In order to achieve the vision and mission, Transparency Serbia will focus on further development:

- Of expert bases in the field of struggle against corruption;
- Adequate programs for the struggle against corruption in Serbia;
- Own capacities and organization structure;
- Regional cooperation with the goal of exchanging experiences and joint effort in the field of struggle against corruption in South East Europe and beyond;
- Network of organizations and individuals with whom the organization cooperates.

Transparency Serbia intends to remain a leading organization in Serbia in terms of anticorruption policies, with a clearly defined approach, high level of expertise and capacities required for efficient implementation of anticorruption programs.

Key items of a successful development and application of the strategic framework are:

1. Development of quality programs
2. Multiplication of financing levels and
3. Development of an adequate organization structure that will be able to deal with challenges
4. development of cooperation with state authorities, other domestic and international institutions and organizations, with business, citizens and media.



## Programs

In the previous period, the following program priorities were set, which are still current:

1. Improving of overall status and work of independent anti-corruption bodies in Serbia;
2. Creating conditions for minimizing corruption in the political system;
3. Eradicating corruption at the points in which public and private sectors meet (public procurements, public-private partnerships, privatization and other);
4. Improving mechanisms for removing and efficient solution of the conflict of public and private interest, in favor of the public one;
5. Introducing ethical principles in business relations and anticorruption standards in private sector;
6. Development and carrying out of anticorruption education programs;
7. Development of corruption risk-assessment mechanisms;
8. Increasing responsibility and conditions for work of civil society organizations;
9. Furthering efficiency and honesty of institutions and mechanisms that protect society from corruption (the police, judiciary, specialized bodies etc.) in order to unveil, expose and penalize corruption;
10. Strengthening of the whistle-blowers' protection, examination of reported cases of corruption and other illegal and harmful actions and elimination of systemic errors that made possible the occurrence of corruption;
11. Improving of overall structure and work of public sector in order to ensure rule of law and effective use of tax payers' money;
12. Expanding the front for struggle against corruption through treating this problem along with other issues of vital importance (such as environment protection, protection of customers' rights);
13. Building mechanisms for measuring the presence of corruption in certain spheres of society and perception of corruption among certain categories of people in order to examine the success of anticorruption measures and conceive further actions;
14. Monitoring of effects of anti-corruption legislation and implementation of anti-corruption strategic acts
15. Use of the anti-corruption opportunities provided by the negotiations on the accession of the Republic of Serbia to the European Union

## Prerequisites for program implementation

In terms of program development, Transparency Serbia will rely on its own experts, people who are well acquainted with certain domestic and international issues, but also on the experiences of other branches of Transparency International and capacities of the secretariat of Transparency International. In this way, Transparency Serbia will be in the position to conceive and carry out quality anticorruption programs, but also to operate more successfully at a regional level. In view of this, Transparency Serbia plans to, parallel to integration processes at regional level; expand the range of programs on the development of which it works, including creating a regional network for

struggle against corruption. In this respect, Transparency Serbia projects the necessity of cooperation with expert organizations, specialized in the fields that have mutual meeting points with struggle against corruption (preventing organized crime, protection of human rights, transparency of public finance, education of citizens', media and public officials and other).

Transparency Serbia will also pay particular attention to increasing its own visibility and being recognizable in public through building an image of a politically un-biased, expert and active organization, that is capable of recognizing the very essence of a problem, able to conceive, on its own or in cooperation with others, a solution for overcoming it and prepared to provide help and support for everyone who wishes to struggle against corruption within their power and through actions performed as defined in the statute.

## Development of a financial basis

Bearing in mind the economic situation in which Serbia finds itself, it is not probable that in the period covered by this Strategic framework the state and private sector will be able to financially support programs and development of the organization to a major extent. With that in mind, Transparency Serbia is aware that its funding will mostly rely on support of international donors' institutions.

In searching the necessary funds, Transparency Serbia will try to attain financial independence, striving towards obtaining funds for carrying out projects and work of the organization from various sources.

Transparency Serbia will engage in obtaining less common forms of financial support for carrying out its programs and for the work of the organization – by applying for grants from the state budget, local self-governments and the like (if the procedure for distribution of funds is clear and competitive one), developing cooperation with private sector and carrying out programs that are partly self-financed.

In addition, we will use opportunities to finance activities that are in line with the goals and priorities of TS, through engagement in wider programs of international aid to Serbia, as partners to institutions that implement such projects, in a way that does not jeopardize the principles of our action.

Transparency Serbia will make sure that information on its sources of funding are accessible to donors and other interested parties, as well as for the results achieved through these funds to be visible and subject to examination.

## Development of the organisation

Organization development includes:

- Strengthening capacities of the organization (acquiring particular material resources, furthering the existing organization structure and involving new individuals in the work of the association) and

- Increased cooperation with other organizations and branches of Transparency International in the field of struggle against corruption, in order to improve expertise, exchange of experiences and realization of goals of the organization.

While building its own organizational infrastructure, Transparency Serbia will pay particular attention to furthering the measures relating to responsibility of officials and engaged persons and their tasks, providing due monitoring and reacting to the development of the situation in view of realization of program goals, maintaining politically unbiased position, involvement of representatives of different social groups, prevention and solving conflict of interests, development of healthy interpersonal relations, preserving and furthering the organization's reputation, promoting openness in the work of the organization management and its members as well of accessibility of information regarding sources of funding of the organization.

## Strategic priorities of Transparency International and their implementation in Serbia

### Goals and outcomes of the TI Strategy 2030

#### 1. PROTECT THE PUBLIC'S RESOURCES

- 1.1 Maximum openness, transparency and responsiveness in public contracting
- 1.2 More effective prevention and exposure of public sector bribery, theft and abuse of power

Public resources - ways of their abuse and possible ways of protection - is one of the main topics for TS, and one of the topics by which the public (media, experts, international organizations in Serbia and others) recognize TS.

In connection with the protection of public resources, the following existing TS programs are particularly dedicated:

- Improving of overall status and work of independent anti-corruption bodies in Serbia; Especially in connection with ensuring adequate working conditions, independence, but also regular and thorough consideration of the reports of bodies that contribute to the protection of public finances, such as the Fiscal Council, the State Audit Institution, the Republic Commission for the Protection of Rights in Public Procurement Procedures, the Commission for State Aid, as well as improving the position and work of certain other bodies whose position is not adequately defined (e.g. the Commission for Public-Private Partnerships), and in a broader sense also of independent bodies in the judiciary
- Creating conditions for minimizing corruption in the political system; Especially in connection with the out of institutional influence of political parties and individuals in power on decisions concerning the use of public resources.

- Eradicating corruption at the points in which public and private sectors meet (public procurements, public-private partnerships, privatization distribution of the state aid and other); A program fully dedicated to the protection of public resources
- Improving mechanisms for removing and efficient solution of the conflict of public and private interest, in favor of the public one;
- Improvement of mechanisms for combating money laundering, organized crime, confiscation of illegally acquired property and compensation for damages to victims of corruption;
- Development and carrying out of anticorruption education programs and work with educational institutions; The program is partly dedicated to protecting public resources.
- Development of methodologies for assessing and reducing the risk of corruption; It also partly refers to the risks of corruption in connection with decision-making on the disposal of public resources.
- Strengthening of the whistle-blowers' protection, examination of reported cases of corruption and other illegal and harmful actions and elimination of systemic errors that made possible the occurrence of corruption;
- Improving of overall structure and work of public sector in order to ensure rule of law and effective use of tax payers' money;
- Monitoring of effects of anti-corruption legislation and implementation of anti-corruption strategic acts; In the part related to public resources.
- Use of the anti-corruption opportunities provided by the negotiations on the accession of the Republic of Serbia to the European Union. In the part related to the protection of public resources, especially in the context of chapter 5 and 32.

Bearing in mind the current development of the situation, we determine the following priorities for the period of application of this document:

1. Increasing the responsibility of the government, the ability of citizens to influence the determination of priorities that will be financed with public funds, especially when this leads to a significant increase in indebtedness, without a clear calculation of the expected benefits.
2. Increasing the transparency of information on budget execution, introducing opportunities for citizens to influence the budget at the central level and improving the practice of budget consultations at the local government level.
3. Termination of the practice of contracting the most valuable jobs at the meeting of the public and private sectors, that is, the public sector of Serbia and other countries through direct interstate agreements, which exclude competition, exclude or significantly limit transparency and deprive not only citizens, but also state control bodies of the opportunity to determine the benefits and harms of such arrangements.
4. Strengthening supervision in public procurement and further increasing transparency and connection with other budgetary processes.

5. Eliminating corruption risks from regulations on public-private partnership and providing the public with data on the execution of existing contracts of this type.
6. Increasing public responsibility for regulatory and financial interventions: Any regulatory or financial intervention by the state, especially when it affects the economy, creates an increased risk of corruption. Therefore, we should strive to make such interventions only when they are necessary and with the application of measures to protect against corruption, that is, only when clear and relevant criteria for the allocation of funds have been set in advance, when all important decisions have been announced and when the supervision of by the actions of authorities that grant state aid and supervision over the fulfillment of the obligations of the recipients of such aid. The reform of regulations should also be continued in order to remove procedures that burden the work of the economy and citizens for no justified reason, to make wider use of the possibilities provided by means of electronic communication, opening and connecting databases. The practice of allocating budget funds and other forms of state aid to certain categories of citizens before the elections should be completely stopped, as well as the practice of privileging economic entities through debt forgiveness or assumption of debt, and a clear calculation of the potential benefits of financial incentives through state aid against the resulting costs for the budget should be published and for the part of the economy that does not receive subsidies.
7. Implementation of existing rules and their amending where necessary, in order to ensure: a complete cessation of the practice of buying media influence or wasting public funds through spending money on promotional actions of public companies, ministries, provincial and local authorities, as well as through public procurement of information services whose primary purpose is political promotion; transparent determination of the public interest that should be achieved through the financing of media content and the distribution of funds for that purpose; providing the public with media ownership and other data that may indicate influence on editorial policy (e.g. data on the largest advertisers). Enacting comprehensive and consistent rules on state and political advertising.
8. Specifying and implementing mechanisms of responsibility in case of damage to public resources and effective compensation for that damage.

## 1. STOP FLOWS OF DIRTY MONEY

- 2.1 Disabled systems for secret payments and concealment of assets
- 2.2 Increased accountability for corruption-enabling networks and gatekeepers

Recognizing the dangers brought by the free flow of money acquired through criminal activities, as well as the impact of those flows on increasing the scope of corruption, and the need for continuous efforts not only at the national, but also regional or global level, TS primarily deals with these topics within the following programs:

1. Creating conditions for minimizing corruption in the political system;

2. Improving mechanisms for removing and efficient solution of the conflict of public and private interest, in favor of the public one;
3. Introduction of ethical principles in business relations and anti-corruption standards in the private sector;
4. Improvement of mechanisms for combating money laundering, organized crime, confiscation of illegally acquired property and compensation for damages to victims of corruption;
5. Development and carrying out of anticorruption education programs and work with educational institutions;
6. Development of methodologies for assessing and reducing the risk of corruption;
7. Improving the efficiency and integrity of institutions and mechanisms that protect society from corruption (police, judiciary, specialized bodies, etc.), for the sake of more successful detection, disclosure and punishment of corruption;
8. Construction of mechanisms for measuring the presence of corruption in certain social spheres and the perception of corruption among certain categories of people in order to verify the success of anti-corruption measures and design further action;
9. Use of the anti-corruption opportunities provided by the negotiations on the accession of the Republic of Serbia to the European Union.

Bearing in mind the current development of the situation, we determine the following priorities for the period of application of this document:

1. Strengthening international cooperation in connection with the use of illegally obtained money and corruption with cross-border elements.
2. Linking databases on real owners and increasing the usability of those registers by specifying the rules.
3. Wider use of special investigative techniques and financial investigations in uncovering corruption and informing the public about the implementation and outcome of such investigations, confiscation of illegal benefits obtained through corruption.
4. Use of mechanisms for cross-checking assets and income (that is, the mechanism from the Law on Investigating the Origin of Assets and Special Taxes) by the Tax Administration so that potential participants in corruption are investigated as a priority.
5. Specifying the powers and obligations of the Agency for the Prevention of Corruption in checking the accuracy and completeness of data on the assets and income of public officials.
6. Introduction of the criminal offense of "illegal enrichment" into the legal system, based on Article 20 of the UNCAC.
7. Strengthening the effectiveness of control in the field of financing political parties and election campaigns.



8. Strengthening legal mechanisms and supervision related to the application of rules on accounting and auditing.

### 3. SECURE INTEGRITY IN POLITICS

3.1 Removal of undue influence from elections and political appointments

3.2 Greater transparency, accountability and equity in influence over public decision-making

Since the beginning of its work, TS has been devoted to the greatest extent to the implementation of programs related to this area. Currently, the following directly relate to this area:

1. Improving of overall status and work of independent anti-corruption bodies in Serbia; Especially in connection with the Agency for the Prevention of Corruption, as a key institution in this segment.
2. Creating conditions for minimizing corruption in the political system;
3. Improving mechanisms for removing and efficient solution of the conflict of public and private interest, in favor of the public one;
4. Development and carrying out of anticorruption education programs and work with educational institutions;
5. Development of methodologies for assessing and reducing the risk of corruption;
6. Strengthening the system for the protection of whistleblowers, investigating reported cases of corruption and other illegal and harmful actions and eliminating systemic errors that allowed corruption to occur;
7. Monitoring the effects of the implementation of anti-corruption regulations and the strategic acts for the fight against corruption;
8. Use of the anti-corruption opportunities provided by the negotiations on the accession of the Republic of Serbia to the European Union.

Bearing in mind the current situation, we determine the following priorities for the period of application of this document:

1. Increasing publicity and participation in the decision-making process;
2. Subjecting all laws and planning documents to public hearings;
3. Consideration of the effects of the implementation of anti-corruption laws and the need to pass new ones in the Assembly.



4. Expanding the obligation to prepare a corruption risk analysis in drafts and proposals of laws and other regulations by the Agency for the Prevention of Corruption and consideration of those analyzes in the Assembly;
5. Amending the legal framework for lobbying so that it refers to any attempt to influence decision-making in the public sector, regardless of whether it is done through professional intermediaries or by directly interested persons, whether it refers to the content of regulations or decision-making in individual cases, whether it is done in a prescribed procedure or through informal contacts. It is also necessary to increase the publicity of information about formal and informal lobbying and about the decision-making process;
6. Minutes and discussions from Government sessions should become public as a rule; along with the decisions on appointments, dismissals, appointments and proposals for personnel solutions made by the Government, the explanation should be published; similarly, the Government should publish the explanation of the proposed by-laws it passes (regulations) and proposed conclusions based on which it adopts guidelines, reports, plans and other acts;
7. All submitted amendments and the reasons why the proponent (most often the Government) and the parliamentary committees accept or reject the amendments should be published on the website of the Assembly;
8. Improvement of the Code of Ethics of MPs;
9. Regulating the process of electing heads of independent bodies in the Assembly in a way that reduces arbitrariness and direct political trade, and ensures greater integrity and expertise;
10. Appointment of the management of public companies and public services based on conducted competitions and the quality of the proposed work program; regular review of business programs of public companies and reports on their implementation and consistent implementation of legal norms on directors' responsibility for non-implementation of programs and non-publication of these documents; strengthening of bodies that carry out supervision within the executive power, especially budget inspection;
11. In connection with the elections and election campaign, as well as the campaign related to the referendum - The legal framework for the election campaign had to be amended, first of all by limiting the promotional activities of public officials during the campaign period, by setting rules regarding campaigns conducted by third parties in connection with the elections, by enabling an adequate level of publicity of financing data while the campaign lasts, by limiting of the total costs of the election campaign and the introduction of more logical rules for the allocation of budget funds.
12. Amending the Constitution, among other things, to narrow excessively broad immunity from criminal prosecution, regulate the number and position of deputies, regulate the status of independent state bodies, set up a dam for violating the rules on the disposal of public finances through excessive borrowing and international agreements, better regulate the resolution of conflicts of interest and giving stronger guarantees for public work of government bodies. The procedure for amending the Constitution (public discussion) is not regulated, and the financing of the referendum campaign is not fully regulated in an adequate manner, which also needs to be fixed before the next declaration of the citizens on the highest legal act.

13. Development of activities at the local level in the direction of strengthening the legal framework for the process of consultation and wider participation of citizens.

#### 4. DRIVE INTEGRITY IN BUSINESS

4.1. A critical mass of business leadership fulfilling strong integrity commitments

4.2 More effective exposure and punishment of corrupt business

The following current TS programs are associated with this field:

1. Creating conditions for minimizing corruption in the political system; The connection is partial and refers to the financing of political entities (voluntary or forced) by business companies.
2. Suppression of corruption at the points of contact between the public and private sectors (public procurement, public-private partnerships, privatization, allocation of state aid and others);
3. Introduction of ethical principles in business relations and anti-corruption standards in the private sector;
4. Improvement of mechanisms for combating money laundering, organized crime, confiscation of illegally acquired property and compensation for damages to victims of corruption;
5. Development and implementation of anti-corruption educational programs and work with educational institutions;
6. Strengthening the whistleblower protection system, investigating reported cases of corruption and other illegal and harmful actions, and eliminating systemic errors that allowed corruption to occur;
7. Monitoring the effects of the application of anti-corruption regulations and the implementation of strategic acts for the fight against corruption;

Bearing in mind the current situation, the following priorities are set for the period of application of this document:

1. Improving the implementation of the already existing responsibility of legal entities for criminal acts with an element of corruption;
2. Strengthening of mechanisms for combating abuses and corruption in public enterprises and other enterprises owned by the state;
3. More effective control regarding the provision of free or less paid services (real or forced) by domestic and foreign companies to political entities;
4. Improving the frequency of control of illegal agreements between bidders by the Commission for the Protection of Competition and its cooperation with other state bodies;

5. Encouraging the introduction of ethical and anti-corruption standards and conducting training on their application in business entities and their associations;
6. Cooperation with business entities and associations in relation to issues where an element of public and (their) private interest is recognizable, such as the issue of public procurement and non-selective work of inspections.

## 5. PURSUE ENFORCEMENT AND JUSTICE

- 5.1 Greater equity, consistency and removal of bias in corruption prosecutions and judicial outcomes
- 5.2. Strengthened independence, capacity and will to act for integrity institutions
- 5.3 An effective international anti-corruption enforcement framework

Our following programs are particularly important in the work in this area:

1. Improving the position and work of independent anti-corruption bodies in Serbia;
2. Improvement of mechanisms for combating money laundering, organized crime, confiscation of illegally acquired property and compensation for damages to victims of corruption;
3. Development and implementation of anti-corruption educational programs and work with educational institutions;
4. Increasing responsibility and improving conditions for the work of civil society organizations and the media;
5. Improving the efficiency and honesty of institutions and mechanisms that protect society from corruption (police, judiciary, specialized bodies, etc.), for the sake of more successful detection, disclosure and punishment of corruption;
6. Strengthening the system for the protection of whistleblowers, investigating reported cases of corruption and other illegal and harmful actions and eliminating systemic errors that allowed corruption to occur;
7. Monitoring the effects of the implementation of anti-corruption regulations and the implementation of strategic acts for the fight against corruption;
8. Using the opportunities in the fight against corruption provided by the negotiations on the accession of the Republic of Serbia to the European Union.

Bearing in mind the current situation, we determine the following priorities for the period of application of this document:

1. Improvement of the Criminal Code, the Code of Criminal Procedure and the Law on the Organization and Competence of State Bodies in Combating Corruption, based on proposals formulated by the TS;

2. Establishment of grounds (legal and real) for proactive action by prosecutor's offices in cases of corruption;
3. Increasing the transparency of the actions of investigative bodies;
4. Establishing an adequate right to compensation for victims of corruption, in accordance with the Civil Law Convention of the Council of Europe;
5. Introduction of the criminal offense of illegal enrichment and full alignment with the UNCAC;
6. Creation and distribution of practical manuals for citizens considering reporting corruption;
7. Strengthening the independence of institutions that apply repressive and preventive anti-corruption laws;
8. Cooperation with other civil society organizations and investigative media in the disclosure of cases of possible corruption and their timely investigation by investigative bodies;
9. Completing the reform of the judiciary in a way that ensures not only the independence but also the responsibility of judges and public prosecutors ;
10. Submission of reports (criminal and other) if there is sufficient grounds for it;
11. Strengthening the system for handling whistleblower reports and eliminating the problems they have pointed out.

## 6. EXPAND CIVIC SPACE FOR ACCOUNTABILITY

6.1 Enhanced freedom and security for activists, whistleblowers and journalists to challenge abuse of power

6.2 Increased channels for people to demand results for the common good

This area of work of the global movement is related to the following existing TS programs:

1. Creation of conditions for suppression of corruption in the political system;
2. Development and implementation of anti-corruption educational programs and work with educational institutions;
3. Development of methodologies for assessing and reducing the risk of corruption;
4. Increasing responsibility and improving conditions for the work of civil society organizations and the media;
5. Strengthening the system for the protection of whistleblowers, investigating reported cases of corruption and other illegal and harmful actions, and eliminating systemic errors that allowed corruption to occur;
6. Expanding the front for the fight against corruption by treating this problem together with other vital issues (e.g. environmental protection, consumer rights protection);

7. Construction of mechanisms for measuring the presence of corruption in certain social spheres and the perception of corruption among certain categories of people in order to verify the effectiveness of anti-corruption measures and design further action;

8. Using the opportunities in the fight against corruption provided by the negotiations on the accession of the Republic of Serbia to the European Union.

Bearing in mind the current situation, we determine the following priorities for the period of application of this document:

1. Finding an adequate solution in cases of malicious lawsuits, intended to exhaust CSOs and investigative journalists, while protecting the legitimate rights of individuals;
2. Cooperation with CSOs from Serbia and the world in order to oppose pressures, persecution or narrowing of the space for civil society action in the field of anti-corruption and in other related areas;
3. Strengthening the system for free access to information and preventing the reduction of existing rights;
4. Strengthening of the legal framework for whistleblower activity and practical handling of whistleblower reports, among other things, also based on the decision from the EU directive;
5. Designing and implementing or participating in the implementation of research by other subjects through which the reasons for reporting or not reporting corruption are determined;
6. Working with local communities and organizations that operate in related fields or point to possible corruption;
7. Work with vulnerable groups, especially in the area of access to information and in connection with the participation of citizens in the creation of public policies and budgets;
8. Cooperation within existing or new coalitions, including the Three Freedoms platform, OKO, prEUgovor, NKEU and SPIK;
9. Improving opportunities for citizen influence on the decision-making process - especially through popular initiatives and citizen chairs and encouraging the use of those mechanisms;
10. Development and distribution of practical manuals for citizens considering reporting corruption;
11. Participation in public consultation processes, discussions, public hearings, working groups and all other open channels for influencing the government to act for the common good;
12. Conducting research at the national and local level, including LTI;
13. Improvement of legal and practical possibilities for opening data and their further use.

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## 7. BUILD COMMUNITY LEADERSHIP AGAINST CORRUPTION

7.1 Strengthened public discourse based on deeper understanding and acceptance of accountability values

7.2 A next generation of civic, public and business leaders better equipped to fight corruption

The following existing TS programs are associated with this area:

1. Improving the position and work of independent anti-corruption bodies in Serbia;
2. Creation of conditions for suppression of corruption in the political system;
3. Development and implementation of anti-corruption educational programs and work with educational institutions;
4. Increasing responsibility and improving conditions for the work of civil society organizations and the media;
5. Improving the efficiency and honesty of institutions and mechanisms that protect society from corruption (police, judiciary, specialized bodies, etc.), for the sake of more successful detection, disclosure and punishment of corruption;
6. Expanding the front for the fight against corruption by treating this problem together with other vital issues (e.g. environmental protection, consumer rights protection);
7. Monitoring the effects of the implementation of anti-corruption regulations and the strategic acts for the fight against corruption;
8. Using the opportunities in the fight against corruption provided by the negotiations on the accession of the Republic of Serbia to the European Union.

Bearing in mind the current situation, we determine the following priorities for the period of application of this document:

1. Persistence in explaining the connection between a successful and consistent fight against corruption with the realization of the principles of a democratic society and the rule of law, including the prevention of possible abuses of the anti-corruption narrative, in communication with political actors, the media, international actors and citizens directly;
2. A consistent approach in which TS, and when commenting on individual events, points out systemic problems and possible ways to solve them;
3. Consistently pointing out to political leaders how the integrity system should work;
4. Establishing contact with civil movements interested in issues of good governance and providing information and instructions that can be helpful in building a system of national integrity;
5. Coordination of activities with civil society organizations that represent similar values, through joint work on a more effective system of fighting corruption;

6. Researching the possibility of working on anti-corruption reforms with business entities and their associations
7. Trainings for journalists, representatives of CSOs, students, civil servants and young political activists in relation to anti-corruption issues
8. Support to institutions and individuals in government bodies that continue to do good work, highlighting examples of good practices
9. Persistently inform citizens, through available media and social networks, about how the anti-corruption system should function and what is the essential problem behind some individual occurrence of corruption;
10. Using opportunities for cooperation with international organizations in order to raise the level of their demands and recommendations to the Serbian authorities in the field of fighting corruption to the highest possible level;
11. Implementation of public communication strategies that reduce the space for potential abuse of the Association by politically motivated media;
12. Consistently addressing all political groups in the parliament, regardless of their attitude towards us;
13. Consistently addressing the institutions that are competent, regardless of who has what real influence to solve the problem;
14. Using all open channels for communication with the authorities in achieving goals, whether they are open to all or to specific groups of CSOs (e.g. NKEU);
15. Development of new research tools in the field of fighting corruption;
16. Conducting trainings for young people, civil society activists, officials, journalists and activists;
17. Cooperation with professional associations, the academic community and artists in order to expand anti-corruption alliances and spread messages to segments of society that currently do not follow our activities;
18. Continuation of ALAC work (Anti-corruption Lega Advice Centre).