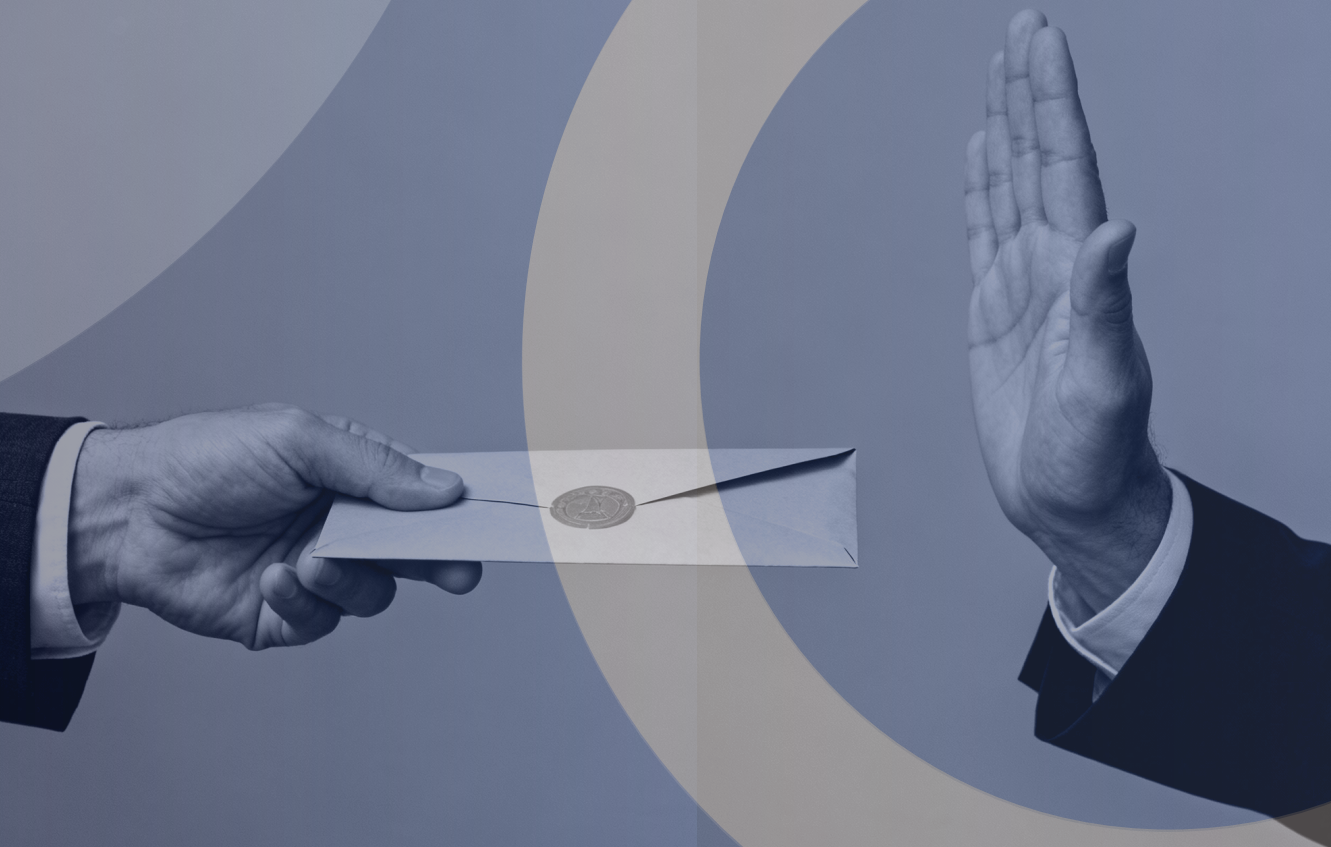


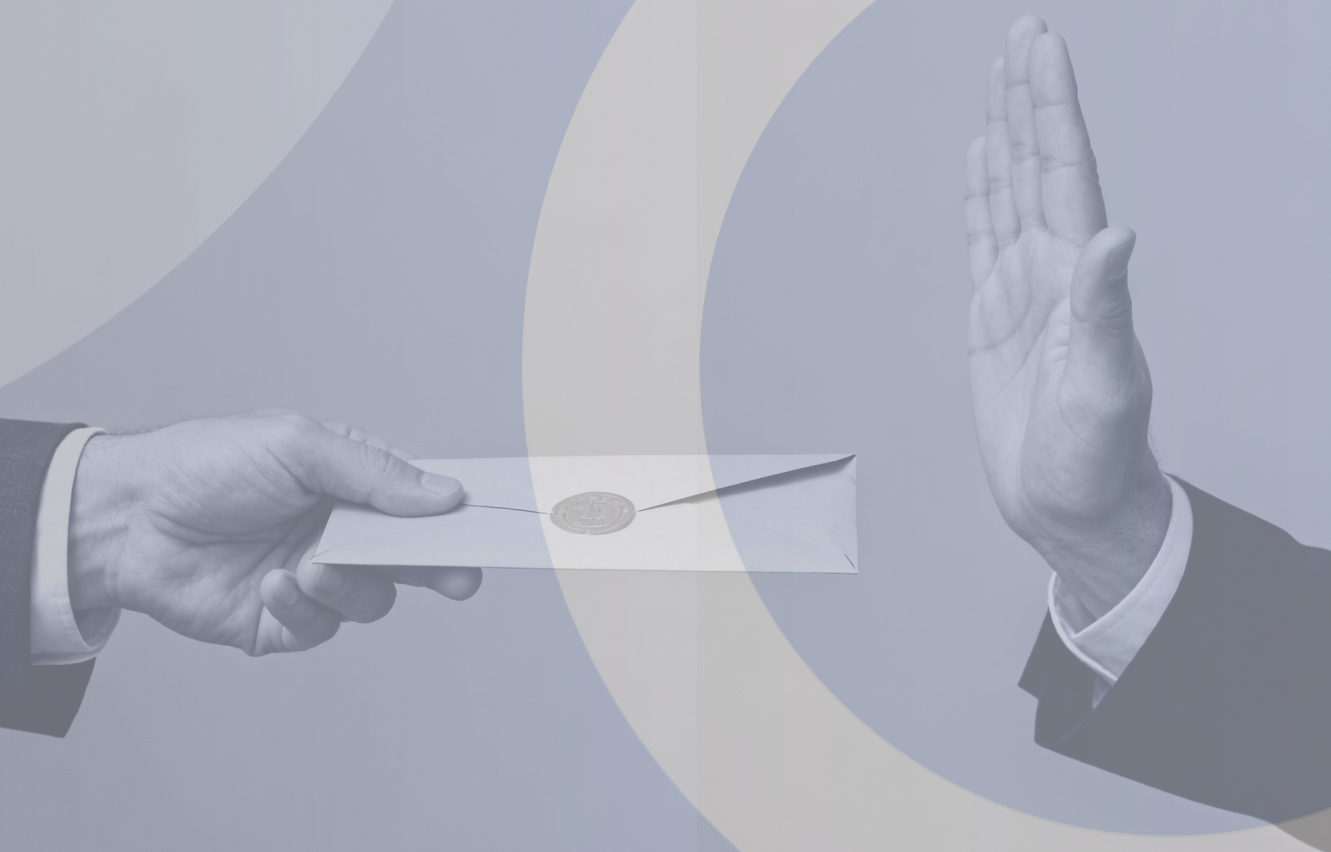
REPORT ON THE IMPLEMENTATION

of Anti-Corruption Policies and Reforms



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MONTENEGRO 2024-2025

REPORT ON THE IMPLEMENTATION OF ANTI-CORRUPTION POLICIES AND REFORMS

MONTENEGRO 2024-2025



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INTRODUCTION

This study was developed within the framework of the project “Blow the Whistle: No Corruption Blindspots in Montenegro”, implemented by the Center for Monitoring and Research (CeMI) with the support of the U.S. Department of State Bureau of International Narcotics and Law Enforcement Affairs (INL) through the U.S. Embassy in Montenegro.

The study is dedicated to analyzing the development and implementation of national anti-corruption policies, with a particular focus on the institutional framework, preventive and repressive mechanisms, as well as the legislative reforms that marked the period from June 2024 through August 2025.

The objective of the study is to provide an overview of the most important institutional, legislative, and strategic developments during the 2024–2025 period, including the role of key bodies such as the Agency for Prevention of Corruption (APC), the Special State Prosecutor’s Office (SSPO), and other institutions engaged in the prevention and suppression of corruption. In this regard, special attention is given to the implemented and planned reforms of the legislative framework, particularly in the areas of corruption prevention, financing of political entities, and electoral campaigns. The amendments adopted in 2025 have significantly redefined the competences and scope of work of the APC.

The study also examines the implementation of integrity plans, the practice of whistleblower reporting, measures to strengthen integrity within public authorities, and the role of sectoral analyses of anti-corruption measures, with a particular focus on the judiciary, local self-government, and health sectors. It further analyzes the results achieved in asset and income control of public officials, oversight of political party financing, as well as measures related to official campaigns and the prevention of misuse of state resources.

In a broader context, the study links the implementation of these policies to Montenegro’s European integration process, through the fulfillment of obligations envisaged by the *Strategy for the Fight Against Corruption 2024–2028*. In this sense, institutional capacities, achievements, and challenges in implementing the activities outlined in the 2024–2025 Action Plan are analyzed as well.

Methodologically, the study is based on the analysis of official documents, laws and by-laws, reports of domestic and international institutions and organizations, as well as data collected through freedom of information requests and media content analysis.

1. INSTITUTIONAL FRAMEWORK

The institutional framework for combating corruption in Montenegro consists of a range of bodies organized at multiple levels. At the constitutional and legislative levels, the foundations have been established through laws and institutions governing the areas of corruption prevention and repression, integrity, conflict of interest, transparency, and accountability. At the high political level, executive bodies play a key role in determining the strategic directions for the development of anti-corruption policies. Preventive mechanisms include a specialized agency responsible for prevention, transparency control, and conflict of interest prevention. The repressive part of the system encompasses prosecutorial, police, and judicial authorities responsible for prosecuting corruption. In addition, the institutional framework is closely linked to the requirements of the European integration process, which further guides and shapes reform efforts.

1.1.1 COMMITTEE FOR ANTI-CORRUPTION OF THE PARLIAMENT OF MONTENEGRO

Within the Parliament of Montenegro, the Committee for Anti-Corruption is responsible for the legislative framework in the field of combating corruption. Following the parliamentary elections of 2023 and the establishment of the new convocation of the Parliament, the Committee for Anti-Corruption was formed, consisting of thirteen members — five from the opposition and eight from the ruling majority.

The Chair of the Committee for Anti-Corruption was appointed from the opposition ranks, with Jevto Eraković, Vice President of the Democratic Party of Socialists (DPS), serving in that position. At the Committee's first session, held on December 18, 2023, Momčilo Leković from the Democrats, representing the ruling majority, was appointed as Deputy Chair. During the same session, the agenda included the consideration of the Annual Report of the Agency for Prevention of Corruption for 2022, which, however, the Committee did not address. The Committee's infrequent meetings and persistent issues with functionality¹ continued throughout 2024.

¹ For instance, on two occasions, the 9th session of the Committee was not held due to the lack of a quorum.

It was only at its 12th session, almost a year later — on December 13, 2024 — that the Committee finally reviewed the Report and decided to recommend to the Parliament that the document not be adopted. Similarly, at its 16th session, the Committee did not support the Annual Reports of the Agency for Prevention of Corruption for 2023 and 2024 and decided to propose to the Parliament that these reports not be accepted. This brief overview illustrates the continuation of political divisions within the Committee, which have prevented it from assuming a more active role in preventing and addressing the sources of corruption across social, political, and institutional structures. Furthermore, such practice reflects the continued strained relations between the Committee and the Agency for Prevention of Corruption, a dynamic already evident during the previous convocation of Parliament (2020–2023). These tensions resulted in a lack of readiness to ensure that the initiatives, documents, and procedures submitted by the Agency to the Committee would lead to an improved legislative and institutional framework.²

One of the key competences of the Committee consists of initiating the procedure for the selection of members of the Council of the Agency for Prevention of Corruption. The mandate of the previous Council expired on 1 August 2023, while the new Council was appointed only in July 2024, following a series of political complications.

With significant delay, the process began with the adoption of the Decision on the Establishment of the Commission for the Implementation of the Election of Members of the Council of the Agency for Prevention of Corruption, composed of Dr. Jevto Eraković, Momčilo Leković, Miodrag Iličković, Miroslav Turković, and Pavle Ćupić, as well as the announcement of the Public Call for the Selection of Five Members of the Council of the Agency for Prevention of Corruption (No. 00-63-13/24-19) at the Committee's third session held in March 2024. Nine candidates applied for the public call.

The entire process was accompanied by political controversy, as the Commission, at the very beginning, determined the ranking list of candidates who met the requirements of Articles 83 and 84 of the Law on Prevention of Corruption and decided to conduct interviews with only three candidates — Dragana Šuković, Mladen Tomović, and Slavica Mirković. In the later phase of the process,

² Report on National Anticorruption Policies Montenegro 2023, CeMI, p. 10

the Commission adopted the Proposal for the Selection of Two Candidates for Members of the Council of the Agency for Prevention of Corruption, which failed to receive the required majority in the Committee, obtaining only two votes “in favor” and five “abstentions.”

As a result, the Committee was obliged to repeat the public call, and the decision to reopen the procedure was adopted unanimously. The newly formed Commission — with the same composition except for Pavle Ćupić, who was replaced by Bojana Jokić — repeated the procedure, after which, at the Committee’s 9th session, a list of five candidates for the selection of members of the Council of the Agency for Prevention of Corruption was determined.

Composition of the Committee for Anti-Corruption:

- **Jevto Eraković – Chair of the COmmittee**
- **Momčilo Leković – Vice-chair of the Committee**
- **Miodrag Laković**
- **Dane Marković**
- **Tonći Janović**
- **Maja Vučelić**
- **Elvir Zvrko**
- **Nikola Janović**
- **Dritan Abazović**
- **Jevrosima Pejović**
- **Dragan Bojović**
- **Jasmin Ćorović**
- **Marko Kovačević**

Mandate of the Committee for Anti-Corruption:

- Supervises and analyzes the work of state authorities, institutions, organizations, and bodies engaged in the fight against corruption and organized crime;
- Examines issues and challenges in the implementation of laws related to combating corruption and organized crime;
- Proposes additional measures to improve strategies, action plans, and other documents concerning the fight against corruption and organized crime;
- Reviews petitions and refers them to the competent authorities in accordance with item 1 of Article 48a of the Rules of Procedure of the Parliament of Montenegro.

1.2.1 NATIONAL COUNCIL FOR THE FIGHT AGAINST CORRUPTION

The current convocation of the National Council for the Fight Against Corruption commenced its work in February 2024, following the adoption of the *Decision on the Establishment of the National Council for the Fight Against Corruption* by the Government of Montenegro. The Decision defined the Council's tasks and composition, as well as the basic guidelines for its operation.

The initial composition of the Council was subject to criticism precisely on these grounds, highlighting the absence of a clearly defined role and mission of the Council within the overall anti-corruption system — an issue also noted in the 2022 GRECO Report.³

The primary responsibility of the Council was the development and adoption of the *Strategy for the Fight Against Corruption*, a key strategic document that had been missing for nearly a decade (the previous *Strategy for the Fight Against Corruption and Organized Crime* was in effect during the period 2010–2014).

³ "GRECO recommends that clear role and missions be assigned to the National Council for Fighting Corruption so as to ensure the consistency of the overall strategy for preventing and fighting corruption"- (GrecoEvalRep5(2022)2, p. 13)

In addition to the necessity of adopting the new Strategy, the document contains several shortcomings regarding the assessment and analysis of the initial situation, as well as the clarity and precision of indicators for monitoring its implementation. In this context, CeMI prepared a detailed review and analysis of the Strategy's implementation one year after its adoption, identifying key challenges and areas for improvement.⁴

In addition to the identified shortcomings of the Strategy, the work of the Council itself has not been at a satisfactory level. Although the *Decision on Establishment* stipulates that the Council shall convene as needed, but at least once a month, during 2024 the Council met only twice — in March, to consider the draft Strategy, and in June, when the Strategy for the Fight Against Corruption was adopted together with the accompanying Action Plan for Implementation for the period 2024–2025.

In the remainder of 2024, the Council did not convene for a full six months, which led one of the members from the non-governmental sector to resign from the Council. During 2025, the Council met more frequently; however, its work has been burdened by non-transparent procedures. On several occasions, Council members received the session materials immediately before the meetings began⁵, moreover, updated information on the work of the Council is not available on the official website of the Government of Montenegro. In this context, out of six sessions held by July 2025, information is publicly available for only two of them. The public has no access to the minutes of meetings, conclusions, or key activities undertaken by the Council.

For the purpose of monitoring the implementation of the Strategy, the Council established an *Operational Team* to assist the Council in continuously tracking the application of the Strategy. The main tasks of the Operational Team include collecting information on activities related to the implementation of the *Strategy for the Fight Against Corruption and its Action Plan for the period 2024–2025*, providing guidance and recommendations for monitoring and fulfilling the obligations defined by the Strategy and Action Plan, and regularly reporting to the Council on its work.⁶ The Operational Team is tasked with reporting to the Council on a

4 Available at: <https://cemi.org.me/me/post/tehnicki-izvjestaj-o-ispunjenosti-akcionog-plana-i-strategije-borbe-protiv-korupcije-2024-2028-1307>

5 See: <https://institut-alternativa.org/osvrt-na-godinu-dana-primjene-strategije-za-borbu-protiv-korupcije/>

6 Government of Montenegro, Odluka o izmjenama i dopuni Odluke o obrazovanju Nacionalnog

quarterly basis regarding the level of implementation of the Strategy. Already in the initial reports, problems were identified concerning both the content of the strategic document and the reporting practices of the institutions responsible for implementing the activities. In several areas, institutions submitted reports based on superficial assessments, without concrete data or relying on inaccurate information.

These issues were highlighted during a workshop organized in Podgorica by UN-ODC in July 2025, marking one year of the Strategy's implementation. The event brought together members of the Council, institutional representatives, the NGO sector, and international organizations to assess implementation results. It was emphasized that there are serious deficiencies in the reporting process on the implementation of measures: quantitative data are missing, activities are often declared completed without evidence, and indicators lack precision. These conclusions are consistent with the findings of the *technical report prepared by CeMI* on the occasion of the one-year implementation review of the Strategy.⁷

Composition of the National Council for the Fight Against Corruption: :

In accordance with the Decision on the Establishment of the National Council for the Fight Against Corruption ("Official Gazette of Montenegro," No. 016/24),⁸ the Council is composed of a President, a Vice President, and 22 members:

- Deputy Prime Minister for Political System, Justice and Anti-Corruption – President of the Council
- Minister of Justice – Deputy President of the Council
- Deputy Prime Minister for Labour, Education, Health, and Social Affairs
- Minister of Interior
- Minister of Finance
- Minister of Spatial Planning, Urbanism and State Property
- Minister of Public Administration
- Minister of Tourism, Ecology, Sustainable Development and Northern Development
- Minister of Energy and Mining

savjeta za borbu protiv korupcije.

⁷ Available at: <https://cemi.org.me/me/post/tehnicki-izvjestaj-o-ispunjenosti-akcionog-plana-i-strategije-borbe-protiv-korupcije-2024-2028-1307>

⁸ Available at: <https://www.sluzbenilist.me/propisi/DDF626FA-5EB8-4360-8314-52DD8A98123C?page=1>

- Minister of Agriculture, Forestry and Water Management
- Director of the Agency for Prevention of Corruption
- Director of the National Security Agency
- Director of the Revenue and Customs Administration
- Director of the Customs Administration
- Supreme State Prosecutor
- Chief Special Prosecutor
- President of the Supreme Court of Montenegro
- Representative of the Chamber of Economy of Montenegro
- Representative of the Union of Municipalities of Montenegro
- Representative of the Montenegrin Academy of Sciences and Arts
- Three representatives of the non-governmental sector

Tasks of the National Council for the Fight Against Corruption:

- Prepares the Strategy for the Fight Against Corruption with accompanying action plans, in cooperation with the Ministry of Justice, and monitors its implementation;
- Organizes, coordinates, and monitors the priorities, dynamics, and deadlines for implementing activities carried out by state authorities, state administration bodies, local self-government and local administration bodies, and other competent institutions, and assesses the results achieved in fulfilling the objectives of the Strategy;
- Submits to the Government of Montenegro reports on implemented activities, including an assessment of the situation and analysis related to the prevention and fight against corruption, as well as proposals for further measures to ensure more effective implementation of the Strategy, at least twice a year;
- Proposes to the Government additional measures and activities of relevance for the fight against corruption, when needed in specific areas; and
- Provides recommendations to the Government with the aim of improving the normative framework for the prevention of corruption.

1.2.2 COUNCIL FOR THE RULE OF LAW

The Council for the Rule of Law was established as a consultative and working body of the Government of Montenegro by the 43rd Government in April 2023⁹. The Council for the Rule of Law was established with the aim of coordinating and monitoring the implementation of obligations related to fulfilling the benchmarks for closing negotiation chapters 23 and 24. Although the 44th Government was formed in October 2023, the new convocation of the Council for the Rule of Law began its work only in January 2025. During the first eight months of 2025, the Council held three sessions, primarily focusing on improving the working conditions of the judicial and prosecutorial branches of government.

At its first session, the Council for the Rule of Law emphasized the need to strengthen institutional capacities, drawing attention to the shortage of judges and the inadequate spatial capacities of both the courts and the State Prosecutor's Office. In this context, a set of recommendations was formulated to improve the functioning of institutions — including the Special State Prosecutor's Office, the Special Police Department, and the Agency for Prevention of Corruption.

The Council highlighted the need for alignment with GRECO recommendations in the area of anti-corruption and underlined the importance of harmonizing the composition of the negotiating structure and working groups for chapters 23 and 24, along with the development of the *Montenegro–European Union Accession Programme 2025–2026*.

At the Council's second session, the need to address human resource and spatial capacity deficits within the judiciary and prosecution was once again emphasized. In this context, steps were taken to secure adequate premises for the Basic State Prosecutor's Office in Pljevlja, as well as to relocate the Special State Prosecutor's Office and the Special Police Department. Additionally, it was noted that Montenegro had acceded to the *Istanbul Anti-Corruption Action Plan*.¹⁰ At the session, the Council reviewed the findings from the European Commission's non-paper on Chapters 23 and 24, emphasizing the need for constitutional

9 Available at: <https://wapi.gov.me/download-preview/c83d4712-9150-4176-941a-6d2b589bce57?version=1.0>

10 Available at: <https://www.antikorupcija.me/me/novosti/2507180547-crna-gora-pristupila-istanbulskom-akcionom-planu-okviru-acn-oecd/>

amendments to implement certain recommendations.¹¹

At the third session, despite the fact that the Action Plans for Chapters 23 and 24 were adopted only in May 2025,¹² the Council adopted the semi-annual report on the implementation of activities. In addition, the Council analyzed the *European Commission's 2025 Rule of Law Report*.

By the *Decision Amending the Decision on the Establishment of the Council for the Rule of Law* ¹³adopted in February 2025, the composition of the Council was amended and expanded to include a President, a Deputy President, and fifteen members. In June, the composition was further expanded to sixteen members with the addition of the Protector of Human Rights and Freedoms of Montenegro.

Composition of the Council for the Rule of Law:

- **Momo Koprivica** – Deputy Prime Minister for Political System, Justice and Anti-Corruption – President of the Council
- **Maida Gorčević** – Minister of European Affairs – Deputy President of the Council
- **Valentina Pavličić** – President of the Supreme Court
- **Snežana Armenko** – President of the Constitutional Court
- **Radoje Korać** – President of the Judicial Council
- **Milorad Marković** – Supreme State Prosecutor
- **Vladimir Novović** – Chief Special Prosecutor
- **Bojan Božović** – Minister of Justice
- **Danilo Šaranović** – Minister of Interior
- **Fatmir Đeka** – Minister of Human and Minority Rights
- **Lazar Šćepanović** – Director of the Police Directorate
- **Dušan Drakić** – Acting Director of the Agency for Prevention of Corruption

11 The Government's proposal for constitutional amendments is available at: <https://www.gov.me/dokumenta/bebe0c53-070c-43ec-8a8f-8db2f9404073>. The key amendments concern the removal of the Minister of Justice from membership in the Judicial Council, as well as the provision proposed under Amendment IX stipulating that "In disciplinary proceedings against judges, the minister responsible for justice shall not vote."

12 Available at: <https://www.gov.me/clanak/usvajanje-akcionih-planova-za-zavrsna-mjerila-u-pregovarackim-poglavljima-23-i-24-kljucni-korak-ka-evropskoj-buducnosti-crne-gore>

13 Available at: <https://wapi.gov.me/download-preview/8eb8904d-a1d3-468c-be93-e7e347925273?version=1.0>

- **Predrag Zenović** – Chief Negotiator for EU Integration
- **Jelena Grdinić** – Negotiator for Cluster I, Head of the Negotiating Group for Chapter 23
- **Siniša Bjeković** – Protector of Human Rights and Freedoms of Montenegro
- **Jovan Bojović** – Representative of the NGO sector

Tasks of the Council for the Rule of Law:

- Monitors the implementation of obligations under Chapter 23 – Judiciary and Fundamental Rights and Chapter 24 – Justice, Freedom and Security within Montenegro's EU accession process, in accordance with the recommendations of the Minister of European Affairs and the Negotiator for Cluster 1 – Fundamentals;
- Monitors the implementation of obligations aimed at fulfilling the interim benchmarks under Chapters 23 – Judiciary and Fundamental Rights and 24 Justice, Freedom and Security;
- Monitors the implementation of obligations aimed at fulfilling the closing benchmarks under Chapters 23 – Judiciary and Fundamental Rights and 24 – Justice, Freedom and Security;
- Reviews reasons for delays in fulfilling obligations and provides recommendations to state authorities, administrative bodies, and other institutions for urgent action to ensure the realization of obligations under Chapters 23 and 24;
- Performs other tasks in accordance with the Decision on the Establishment of the Negotiating Structure for Montenegro's Accession to the European Union.

1.3.1 PREVENTION OF CORRUPTION - AGENCY FOR PREVENTION OF CORRUPTION

The Agency for Prevention of Corruption (APC) began its work on 1 January 2016, taking over the competences of the Directorate for Anti-Corruption Initiative and the Commission for the Prevention of Conflicts of Interest, as well as part of the responsibilities of the State Election Commission related to the oversight of political entity and election campaign financing. The establishment of the APC was part of

the fulfillment of Interim Benchmark 21, which required Montenegro to establish an agency with a clearly defined mandate and competences.

The APC represents the central body within Montenegro's institutional system responsible for corruption prevention. Its work is primarily regulated by the *Law on Prevention of Corruption, the Law on Financing of Political Entities and Election Campaigns, and the Law on Lobbying*.

The governing bodies of the Agency are the Council and the Director. Article 92 of the *Law on Prevention of Corruption* stipulates that the Director represents and acts on behalf of the Agency, organizes and is accountable for its operations, adopts decisions, issues opinions and recommendations, undertakes other measures within the Agency's mandate, and performs other duties in accordance with the law.

The supervisory function over the Agency's work is exercised by the *Council of the Agency*, whose five members are appointed by the Parliament of Montenegro upon the proposal of the competent parliamentary committee. The selection of candidates is conducted through a public call. The previous convocation of the APC Council served from 2019 to 2023. The Parliament of Montenegro failed to meet its legal obligation to timely initiate the procedure for electing a new Council. The new APC Council was elected in its full composition only in July 2024.

The Council elects the Director of the Agency for Prevention of Corruption based on a public call, requiring the votes of four out of five Council members (the same majority is required for the election of the Council President). In August 2024, the Council of the Agency appointed **Dušan Drakić** as Acting Director, who has been serving in that capacity pending the Council's decision on the appointment of a Director through a public competition. The Council of the Agency announced the Public Call for the *Selection of the Director of the Agency for Prevention of Corruption* on 1 April¹⁴ 2025. After the expiration of the 20-day legal deadline for applications, two candidates applied: the current Acting Director, **Dušan Drakić**, and **Milica Milutinović**. In May 2025, the Council conducted interviews with both candidates but failed to reach a decision, as neither Drakić nor Milutinović received

14 Available at: <https://www.antikorupcija.me/me/savjet-agencije/novosti/2504010609-javni-konkurs-za-izbor-direktora-agencije-za-sprecavanje-korupcije/>

the required majority of votes¹⁵ for appointment to the position of Director of the Agency for Prevention of Corruption for a full mandate¹⁶. Despite earlier announcements that a new public competition would soon be published, the Council of the Agency for Prevention of Corruption (APC) had not announced a new public call as of September 2025. The Council is also responsible for the dismissal of the Director. Article 93 of the Law on Prevention of Corruption stipulates that the Council shall adopt its Rules of Procedure, announce the public competition for the election of the Director of the Agency, and elect and dismiss the Director. The procedural framework is designed to ensure publicity and transparency while minimizing potential undue — particularly political — influence.

This aspect of the Council's work may be modified if the **Draft Law on Amendments to the Law on Prevention of Corruption** is adopted in the form expected to be submitted to the parliamentary procedure by the Ministry of Justice by the end of 2025. Specifically, the proposal envisages lowering the required majority for the election of the Council President and the Director of the APC from four to three out of five Council members.

Regarding its other competences, the Council proposes the Agency's draft budget to the Parliament through the competent parliamentary committee. Furthermore, Article 103 of the *Law on Prevention of Corruption* stipulates that the Council of the Agency shall submit the Annual Report on the Work of the Agency to the Parliament of Montenegro no later than 31 March of the current year for the previous year.

The Rulebook on Internal Organization and Systematization, adopted in October 2024, provides for 98 positions within the Agency, of which 54 were filled at the beginning of 2025. Out of the 54 employees, 46 hold higher education degrees, seven have completed secondary education, and one employee has completed primary education. Of the 52 positions foreseen for employees directly engaged in the Agency's core functions, 29 were filled, while the remaining positions comprise administrative and technical staff.

¹⁵ During 2025, the Ministry of Justice worked on preparing amendments to the *Law on Prevention of Corruption*. One of the key changes retained after the completion of the public consultation process concerns the modification of the voting system within the Council of the Agency — shifting from a qualified majority (four out of five votes) to a simple majority (three out of five votes) when electing the President and Deputy President of the Council, as well as the Director of the Agency for Prevention of Corruption.

¹⁶ Available at: <https://www.antikorupcija.me/me/savjet-agencije/novosti/2505231317-saopst enje-33-sjednice-savjeta-ask/>

With the aim of further strengthening the APC's organizational and human resource capacities — identified as Strategic Objective 5 in the Agency's Strategic Plan 2022–2024 — the Council adopted in September 2025 the *Human Resources Management Strategy of the Agency for Prevention of Corruption for the period 2025–2026*.¹⁷ The core mission of the Strategy is to “ensure professional and ethical support through the strengthening, attraction, and retention of competent personnel, with the aim of achieving organizational goals and preserving institutional memory.”

In terms of its horizontal organization, the work of the Agency for Prevention of Corruption (APC) is structured through several key sectors, including:

1. Sector for the Oversight of Public Functions and Political Finance:

- Department for the Oversight of Financing of Political Entities and Election Campaigns
- Department for the Oversight of Public Officials' Reports
- Department for the Prevention of Conflicts of Interest of Public Officials

2. Sector for Corruption Prevention and Whistleblower Reports:

- Department for Handling Whistleblower Reports
- Department for Integrity
- Department for Lobbying, Monitoring of Regulations, and Providing Opinions on Anti-Corruption Legislation
- Department for Campaign Implementation, Education, and Research

3. Sector for Conducting Proceedings within the Competence of the Agency:

- Department for Administrative Proceedings
- Department for Misdemeanour Proceedings

Within the work of the **Sector for the Oversight of Public Functions and Political Finance**, specifically the **Department for the Oversight of Public Officials' Reports**, the Agency for Prevention of Corruption (APC) monitors regular asset and income declarations submitted by public officials, who are legally required to provide these reports for the previous year by 31 March of the current year.

During 2024, the Agency carried out administrative and technical verification of all 11,905 received asset and income reports. In terms of accuracy and complete-

¹⁷ Available at: https://www.antikorupcija.me/media/documents/Strategija_upravljanja_ljudskim_resursima_ASK_za_period_2025_-_2026_.godine.pdf#page=5.12

ness, a total of 665 reports were reviewed, while 18 reports underwent in-depth verification. Irregularities were found in 81 cases, and one case was referred to the Special State Prosecutor's Office. In the same area, 1,117 misdemeanor and 73 administrative proceedings were initiated, resulting in sanctions in 72.4% of cases, with total fines amounting to €70,850.

In the first half of 2025, the Agency received a total of 8,943 reports, representing a 13% decrease compared to the same period of the previous year. In the first quarter, 8,357 reports were processed, and in the second quarter 586. In addition to administrative reviews, the APC conducted more detailed checks of accuracy and completeness for 93 reports (49 in Q1 and 44 in Q2), finding irregularities in 49 reports (28 in Q1 and 21 in Q2). Furthermore, in the second quarter, two in-depth checks were carried out at the request of another state authority.

Regarding procedures, in the first quarter of 2025, the APC initiated 37 misdemeanor and 11 administrative proceedings, while in the second quarter the number of misdemeanor proceedings increased significantly — to 417, along with an additional 22 administrative proceedings. Thus, the total number of proceedings in the first half of 2025 (454 misdemeanors and 33 administrative) remained below the volume recorded for the entire year 2024, but the increased activity in the second quarter indicates a growing intensity of the Agency's oversight efforts. Cumulatively, taking into account proceedings initiated in 2024, during the first six months of 2025, 478 misdemeanor cases were concluded before competent courts, resulting in fines in 33.2% of cases, amounting to €9,780.

In addition, during the first quarter of 2025, the Agency identified instances of non-compliance by public officials in submitting reports: 15 out of 151 officials who were required to submit reports within 30 days of assuming office and 18 out of 148 who were required to submit reports after leaving office failed to do so. A similar pattern was observed in the second quarter, where 22 out of 203 public officials failed to meet the obligation, as did 46 out of 114 individuals following termination of their public office.

Cumulatively, this points to an alarming trend of systematic violations of the law regarding the submission of asset and income reports. Nearly 10.5% of public officials failed to submit their reports within the prescribed deadline, while 24.5% did not file reports after leaving public office.

In terms of verifications conducted *ex officio* or upon request, the Agency for Prevention of Corruption (APC) initiated checks on the accuracy and completeness of 51 reports, finding irregularities in 72.5% of cases (37 reports). A similar trend continued in 2025 — during the first six months, verification was completed for 73 reports, with irregularities identified in 47.9% of cases (35 reports).

Following the entry into force of the *Law on the Prevention of Money Laundering and Terrorist Financing* in July 2024, the **Department for the Oversight of Public Officials' Reports** established and began maintaining the Register of Politically Exposed Persons. During 2025, with the support of French expertise, a Draft Guideline on the Register of Politically Exposed Persons in Montenegro was prepared, defining procedures for identifying politically exposed persons and implementing the relevant legal provisions in this area.

Within the **Sector for the Oversight of Public Functions and Political Finance**, the **Department for the Oversight of Financing of Political Entities and Election Campaigns** monitors the financing of political entities and electoral campaigns with the aim of strengthening integrity and ensuring the lawful and accountable use of public resources. During 2024, the APC reviewed 7,348 reports submitted by entities obligated under the *Law on Financing of Political Entities and Election Campaigns*, both in regular activities and during local election campaigns (held in six Montenegrin municipalities in 2024). The total amount of controlled campaign activities was €1,305,056.60. The Agency conducted 412 inspections of compliance with prohibitions and restrictions, recorded 242 violations of the law, and imposed four sanctions involving the loss of public funding in a total amount of €7,805.65. In addition, 132 misdemeanor and 34 administrative proceedings were initiated.

In the first half of 2025, the Agency reviewed 1,263 reports (1,050 in Q1 and 213 in Q2). In the same period, 175 warnings were issued to political entities and public authorities (118 in Q1 and 57 in Q2), while a total of 154 irregularities or legal violations were recorded (76 in Q1 and 78 in Q2). The Agency initiated 46 misdemeanor and 4 administrative proceedings in Q1, and 46 misdemeanor and 3 administrative proceedings in Q2. Additionally, during Q1, the Agency referred four cases related to unlawful one-time payments in the Municipality of Nikšić to the competent Administrative Inspectorate. In Q2, three on-site inspections of public authorities were carried out.

Importantly, in the second quarter of 2025, the Agency imposed 14 measures suspending the transfer of public funds to political entities that failed to submit their consolidated annual financial reports for 2024 within the legal deadline, in a total amount of €138,648.26. This represents a qualitative improvement compared to 2024, when sanctions were fewer and of lower financial value.

The APC's obligations in the area of political and electoral financing oversight are defined by the *Law on Financing of Political Entities and Election Campaigns*. The unpredictability and frequency of extraordinary local elections further burden the Agency's work and reduce its capacity for detailed oversight. However, in July 2025, as part of electoral reform, amendments to the Law on the Election of Councillors and Members of Parliament were adopted. These amendments, which indirectly have a significant impact on the APC's work, stipulate that beginning in 2027, all local elections will be held simultaneously, on a single day, in regular four-year intervals, while introducing stricter rules for the dissolution of municipal assemblies and the scheduling of extraordinary elections. Implementation of this provision is expected to significantly ease the APC's workload, as the Agency's capacity will be concentrated on campaign oversight within a clearly defined timeframe, covering the entire territory of Montenegro.

Within the same sector, the **Department for the Prevention of Conflicts of Interest of Public Officials** issues opinions to prevent and manage conflicts of interest when such situations arise. During 2024, the APC issued a total of 191 opinions, leading to 10 resignations from positions or functions incompatible with public office. In the first half of 2025, the Agency issued 107 opinions (70 in Q1 and 37 in Q2), with 26 of them (15 in Q1 and 11 in Q2) establishing the existence of conflict of interest. As a result, 10 resignations were submitted in Q1 and an additional 2 in Q2. Furthermore, in Q2, based on APC decisions establishing violations of the Law on Prevention of Corruption, 3 additional resignations were filed, and one public official was dismissed from office. While the overall number of opinions was higher in 2024 (191) compared to 2025 (107 in the first half), the number of resignations already recorded in the first six months of 2025 (15 resignations and one dismissal) significantly exceeded the total number of resignations in the entire previous year.

Following the entry into force of the Law on Prevention of Corruption in June 2024, Chapter III of the law provides detailed regulation of the procedures for receiving and processing whistleblower reports. These procedures are implemented with-

in the **Sector for Corruption Prevention and Whistleblower Reports, specifically by the Department for Handling Whistleblower Reports**. Since September 2024, the Agency has significantly intensified activities related to whistleblower protection, aiming to address systemic challenges more decisively. Out of a total of 438 reports (163 from 2024 and 275 from earlier years), the Agency processed 185, or 42%. A total of 116 cases were concluded — the highest number since the Agency's establishment — with 83% finalized in the last four months of 2024. An additional 69 reports were referred to other competent institutions for further action.

In the first quarter of 2025, the Agency handled 278 whistleblower reports (25 new and 253 pending), acting on 46 — the highest number recorded on a quarterly basis since its establishment. Of these, 31 cases were concluded before the Agency, while 15 were forwarded to other institutions (10 to prosecutorial offices and 5 to other authorities). During Q2 2025, the Agency received 44 new reports and proceeded with 15 from previous periods, concluding 9 cases internally and forwarding 6 to other competent bodies. Regarding one earlier case previously referred to a prosecutor's office, the Agency received feedback confirming that an indictment had been filed.

Significantly, in Q2 2025, for the first time since the adoption of the new *Law on Prevention of Corruption* (June 2024), two requests for financial assistance to whistleblowers in court proceedings were submitted — both of which were approved by the Agency.

Additional APC activities in this area included the fulfillment of obligations under the *National Strategy for the Fight Against Corruption 2024–2028*, based on which the Agency prepared a *Draft Analysis of Whistleblower Reporting Practices* (not publicly available) and conducted eight training sessions for various target groups — representatives of 14 state administration bodies responsible for receiving and handling reports, as well as integrity managers from 158 educational institutions.

The Agency also maintains the *Register of Designated Persons for Handling Whistleblower Reports in Public Authorities, Business Entities, Other Legal Entities, and Entrepreneurs*, last updated in July 2025, containing information on 655 entities (public authorities and private entities) with designated whistleblower officers. The register includes information on the type of system, municipality, and des-

ignated person, but could be improved by including specific contact details for responsible individuals.

Within the **Sector for Corruption Prevention and Whistleblower Reports**, the **Department for Integrity** is responsible for activities related to integrity plans. During 2024, the fifth cycle of integrity plans began, representing internal anti-corruption documents developed by public authorities that include measures aimed at preventing and eliminating risks of various forms of corrupt and unethical behavior.

According to the data of the Agency from the Report on the Adoption and Implementation of Integrity Plans for 2024¹⁸, a total of 760 public authorities are legally obliged to adopt an integrity plan. During 2024, 13 authorities adopted and submitted a plan for the first time, while by 31 December this obligation had been fulfilled by 740 authorities (97.4%). In the same year, 680 public authorities updated their integrity plans, and from 2016 to the end of 2024, 741 authorities (97.5%) appointed an integrity manager.

Employees of the competent department held 1,839 consultations with public authorities in 2024, during which integrity managers most frequently sought advice regarding the preparation and implementation of integrity plans, completion of questionnaires for assessing their effectiveness, use of the application, and application of the methodology for assessing anti-corruption measures. The key information contained in integrity plans relates to the assessment of corruption risks within individual institutions. Based on all integrity plans submitted for 2024, the cumulative assessment shows 34.8% low-intensity risks, 59.3% medium-intensity risks, and 5.9% high-intensity risks.

According to the aforementioned report, during the implementation of the fifth cycle of integrity plans, a total of 27,005 measures for risk management within public authorities were implemented, of which 79.8% (21,540) were fully implemented, 11.4% (3,070) were partially implemented, while 8.9% (2,395) were not implemented.

The Agency for the Prevention of Corruption also maintains and updates the list

18 Available at: https://www.antikorupcija.me/media/documents/Izvestaj_o_donosenju_i_sprovođenju_planova_integriteta_u_2024_godini.pdf

of integrity managers, which, as of April 2025, contained information on 743 public authorities, including the names of the persons designated as integrity managers within each respective institution.¹⁹ In addition, the Agency maintains the Register of Integrity Plans, which provides a list of internet addresses where the current integrity plans of 547 public authorities in Montenegro are publicly available.²⁰

As a complementary activity in this area, it is particularly important to highlight the completion of the implementation process of the Methodology for Assessing the Application of Anti-Corruption Measures in the Justice Sector²¹ and local administration²², and the implementation of the Methodology in the healthcare sector has begun, in cooperation with the United Nations Development Programme (UNDP) in Montenegro. In this regard, the average performance in the application of anti-corruption measures at the level of local self-government units in Montenegro stands at 51.08%, taking into account the fact that four municipalities did not submit the data required for the assessment.

The best-performing category of the application index relates to the creation of conditions for the implementation of regulations on corruption prevention (67.48%), followed by strengthening the institutional framework for corruption prevention (45.58%), and enhancing ethical culture (43.12%), while the negative category of point deductions on average contributes -14.58%. Cumulatively, these categories form the stated index of the implementation of anti-corruption measures, with an average implementation level of 51.08%.

A somewhat better situation was recorded in the justice sector, specifically in the judicial subsystem, where the cumulative index amounts to 59.15%. By category, the results are as follows: creation of conditions for the implementation of regulations on corruption prevention (71.85%), followed by strengthening the institutional framework for corruption prevention (60.24%), enhancing ethical culture (62.70%), while the negative category of point deductions contributes on average -19.14%.

19 Available at: https://www.antikorupcija.me/media/documents/Lista_menadzera_integriteta_april_2025.pdf

20 Available at: https://www.antikorupcija.me/media/documents/Linkovi_objavljenih_planova_integriteta_april_2025_hAA1zx0.pdf

21 Available at: https://www.antikorupcija.me/media/documents/Integritet_na_djelu_-_Izvjestaj_o_procjeni_primjene_antikorupcijskih_mjera_u_sudstvu.pdf

22 Available at: https://www.antikorupcija.me/media/documents/Integritet_na_djelu_-_Izvjestaj_o_procjeni_primjene_antikorupcijskih_mjera_za_jedinice_lokalne_samouprave.pdf

Competencies of the Agency for the Prevention of Corruption:

- Determining conflicts of interest among public officials and taking measures for their prevention
- Monitoring compliance with restrictions in the exercise of public functions
- Supervising the receipt of gifts, sponsorships, and donations
- Verifying data from reports on income and assets of public officials
- Providing opinions and recommendations in cases of endangerment of public interest and whistleblower protection
- Monitoring, providing recommendations, and assessing the effectiveness of integrity plans
- Adopting legal acts within its competence; initiating amendments to laws aimed at reducing corruption risks and aligning with international standards
- Initiating and conducting proceedings for violations of the law, cooperating with institutions, and maintaining records and registers
- Issuing misdemeanor orders and initiating misdemeanor and other proceedings
- Organizing educational, research, and preventive anti-corruption activities, as well as international and regional cooperation in the field of corruption prevention
- Supervising lobbying activities; monitoring the financing of political entities and election campaigns, in accordance with special laws

1.4.1. REPRESSION OF CORRUPTION - SPECIAL STATE PROSECUTOR'S OFFICE

When it comes to the repression of corruption, the Special State Prosecutor's Office (SSPO), as the key body for combating high-level corruption and organized crime, was established under the Law on the Special State Prosecutor's Office and began operating in July 2015. According to that law, the SSPO is competent for the prosecution of criminal offences of organized crime, regardless of the prescribed sentence; high-level corruption (a. if a public official commits the criminal offences of abuse of authority, abuse of office, unlawful influence, incitement to

unlawful influence, receiving a bribe, giving a bribe; b. if property gain exceeding forty thousand euros has been obtained through the commission of criminal offences of abuse of position in business operations or abuse of authority in the economy); money laundering; terrorism; war crimes; violations of electoral rights as prescribed in Chapter Sixteen of the Criminal Code of Montenegro.

The Prosecutorial Council appoints the Chief Special Prosecutor and the Special Prosecutors based on a public competition and upon the proposal of the Supreme State Prosecutor. The mandate of the Chief Special Prosecutor lasts five years, and he or she is accountable to the Supreme State Prosecutor for his or her work. A Special Prosecutor is appointed for an indefinite term if he or she has previously served for at least four years as a state prosecutor or a judge, and is accountable to the Chief Special Prosecutor. However, the autonomy of the SSPO is limited in the sense that the Supreme State Prosecutor may directly exercise powers and undertake actions for which the Chief Special Prosecutor is authorized. According to the current organizational structure, the Special State Prosecutor's Office employs 13 prosecutors in the sector for prosecution *ex officio* of offences in the field of "organized crime and high-level corruption."

According to Article 26 of the Law on the SSPO ("Official Gazette of Montenegro", Nos. 10/2015, 53/2016 and 54/2024), police duties related to criminal offences under the jurisdiction of the SSPO are carried out by police officers working in a special organizational unit of the administrative body responsible for police affairs, in cooperation with the SSPO (the Police Department). The head of the Police Department is appointed by the Director of the administrative body (the Police Administration), with the consent of the Chief Special Prosecutor.

In August 2022, the Department for the Fight Against Corruption, Economic Crime and Financial Investigations was established, operating within the Sector for the Fight Against Crime. This department includes organizational subunits, one of which is the Group for the Fight Against Corruption, and according to the latest Rulebook on Internal Organization and Systematization of the Ministry of Interior from December 2024, a total of 20 positions are systematized within the Group for the Fight Against Corruption. The competencies of this Department relate to criminal offences under the jurisdiction of the Higher State Prosecutor's Office, as well as to criminal offences under the jurisdiction of the SSPO — at the request or with the approval of the acting Special Prosecutor — at both the national and international level. Additionally, the organizational structure of the Ministry of Interior also provides for the existence of a separate organizational unit,

the Department for Anti-Corruption, within which 26 positions are systematized.

1.5.1 EUROPEAN INTEGRATION - WORKING GROUP FOR CHAPTER 23

The constitutive session of the negotiating working group for Chapter 23 – Judiciary and Fundamental Rights was held on March 1, 2023, in Podgorica. Following the receipt of a positive IBAR report in the summer of 2024, the focus of the group's work shifted to the preparation and monitoring of the implementation of the Action Plan for meeting the closing benchmarks in Chapter 23. In this context, a two-day thematic session dedicated to the fight against corruption was held in December 2024 as part of the process of drafting the Action Plan.

Public consultations on the draft document were conducted during January and February 2025, after which the Action Plan received the support of the Rule of Law Council. The document was adopted by the Government on April 25, 2025, and represents the most detailed overview of activities and obligations aimed at meeting the three closing benchmarks and 17 indicators that must be implemented by the end of the third quarter of 2026. These activities align with the Government's plan for Montenegro to become a full member of the European Union by 2028.

The working group introduced a semi-annual reporting system on the implementation of the Action Plan, with the first report discussed at the session held on July 4, 2025. At the same session, the level of implementation of obligations under the Accession Program 2025–2026 was also reviewed, and it was noted that less than 20% of obligations under Chapter 23 had been implemented in the first half of 2025. The main challenges identified were the coordination of activities and adherence to deadlines, which continue to pose a serious risk to the pace of the negotiation process.

Composition of the Negotiating Working Group for Chapter 23:

The Negotiating Working Group for Chapter 23 consists of the head of the working group, the deputy head, and over 40 members representing government bodies and civil society.

- Head of the Negotiating Working Group – Jelena Grdinić, Director General at the Ministry of Justice;
- Deputy Head of the Negotiating Working Group – Svetlana Rajković, Ministry of European Affairs.

The tasks of the Negotiating Working Group for Chapter 23 are:

- participating in the analytical review and assessment of the alignment of Montenegro's legislation with the European Union's *acquis communautaire* related to Negotiating Chapter 23 – Judiciary and Fundamental Rights;
- monitoring the implementation of obligations arising from the negotiating position for Chapter 23 – Judiciary and Fundamental Rights;
- participating in the preparation, implementation, and reporting on the implementation of action plans and other documents relevant to Montenegro's accession to the European Union in the area of judiciary and fundamental rights;
- monitoring and reporting on the implementation of interim and closing benchmarks in Chapter 23 – Judiciary and Fundamental Rights;
- participating in the preparation and revision of the Montenegro–EU Accession Program, as well as monitoring and reporting on its implementation concerning Chapter 23 – Judiciary and Fundamental Rights;
- participating in expert missions and performing other tasks relevant to the negotiation process, with the support of state administration bodies and other institutions in the area of EU *acquis* related to Chapter 23 – Judiciary and Fundamental Rights.

2. LEGISLATIVE FRAMEWORK

2.1 LEGISLATIVE FRAMEWORK FOR THE PREVENTION OF CORRUPTION

The legislative framework for the prevention of corruption in Montenegro consists of the Law on the Prevention of Corruption, the Law on the Financing of Political Entities and Election Campaigns, and the Law on Lobbying. These three laws form the foundation and legal basis for the functioning of the Agency for the Prevention of Corruption. The normative system established by these laws defines mechanisms for controlling conflicts of interest, the assets and income of public officials, the transparency of political party and campaign financing, as well as regulating relations between decision-makers and interest groups through lobbying procedures. The Agency for the Prevention of Corruption, as the central institution responsible for implementing these laws, plays a key role in monitoring, controlling, and sanctioning irregularities, as well as in improving integrity standards within the public sector.

The **Law on the Prevention of Corruption** ("Official Gazette of Montenegro", Nos. 53/14, 42/17, 73/23 and 54/24) represents the key legal framework for the prevention of corruption in Montenegro. This law prescribes measures for the prevention of conflicts of interest, restrictions in performing public functions, the obligation to submit reports on the income and assets of public officials, the protection of persons who report threats to the public interest indicating the existence of corruption, as well as other aspects relevant to the prevention of corruption. According to this law, corruption is defined as any abuse of an official, business, or social position or influence for the purpose of obtaining personal gain or benefit for another. The law was last amended in June 2024, as part of the IBAR legislative package, and during 2025, the Ministry of Justice of Montenegro began work on drafting a new Law on the Prevention of Corruption. At the end of December 2024, a public consultation was announced on the Draft Law on Amendments to the Law on the Prevention of Corruption. After the public consultation, the draft law was finalized and is expected to be submitted to the parliamentary procedure by the end of 2025. Among the most important novelties expected to be implemented with the adoption of this draft are the introduction of the *obligation for public officials to declare digital assets*: Public officials are required to declare not

only traditional assets but also assets in electronic or digital form. *Introduction of a new modality for asset verification:* Mechanisms are introduced for verifying the assets of public officials, including automatic access to the inflow/income side of bank accounts of public officials and members of their joint household, in order to ensure transparency and accountability. *Strengthening the role of the Agency for the Prevention of Corruption:* The strengthening of the institutional capacities of the Agency for the Prevention of Corruption is envisaged, including the expansion of competences and resources for more effective implementation of the law.

The Law on the Financing of Political Entities and Election Campaigns prescribes the obligations, restrictions, and prohibitions for public authorities, political entities, and the Agency during the election campaign, as well as in the month following its completion. This law provides that the Agency shall monitor the financing of political entities and oversee the implementation of the legal provisions. The Draft Law on Amendments to the Law on the Financing of Political Entities and Election Campaigns was prepared within the working group of the Committee for Comprehensive Electoral Reform of the Parliament of Montenegro. After nearly a year of work on the draft, which was marked by political disagreements and ambiguities, in July 2025, the draft was harmonized with Montenegro's legal system by the Secretariat for Legislation, and on July 9, a meeting was held with representatives of ODIHR to finalize the amendments. The public hearing on the proposal, including the Draft Law on Amendments to the Law on the Election of Councillors and Members of Parliament, was held on July 24 in the Parliament of Montenegro. In July 2025, the draft law was adopted.

The new amendments expanded the Agency's competences and scope of work in the context of monitoring the financing of political entities. Article 18 introduced a lower threshold of 10,000 euros for election campaign expenses, in order to prevent unlawful financing during campaigns in smaller municipalities. A significant change, prescribed in Article 44, introduced restrictions on employment during the election campaign period: in state bodies, local administrations, public institutions, state funds, state- or municipally-owned enterprises, as well as independent and regulatory agencies, persons may exceptionally be employed for a fixed term only if the position is foreseen in the act on systematization. The engagement of persons under contracts for temporary or occasional work is prohibited, as these previously constituted the majority of the documentation the Agency was required to verify.

Additionally, Article 47 limits the so-called “official’s campaign”, aiming to prevent the misuse of state resources for the promotion of political entities. It stipulates that infrastructure projects and other facilities of public importance may be inaugurated from the date of calling elections until election day only in urgent cases, without public ceremonies or the presence of public officials.

The Law on Lobbying (“Official Gazette of Montenegro”, Nos. 52/14 and 54/2024) regulates the conditions and manner of conducting lobbying activities, the rules of lobbying, and other issues of importance for lobbying. The Draft Law on Lobbying was adopted by the Parliament of Montenegro as part of the IBAR legislative package on June 6, 2024, following the process of alignment with the opinion of the European Commission and the recommendations of the Council of Europe.

The key amendments contained in the new version of the Law refer to the expansion of the definition of lobbying to include activities that were not covered in the previous version, the introduction of standards of openness and transparency regarding lobbying contacts, which include the availability of information on names, areas, and subjects of lobbying, as well as the activities of lobbyists and lobbied persons. The amendments also expand the competences of the Agency for the Prevention of Corruption, which is authorized to supervise the implementation of this law and to initiate proceedings *ex officio*.

The standards that a lobbyist must adhere to, in accordance with the anti-corruption spirit of this law, are prescribed in Article 11, paragraph 1, which states that “A lobbyist or a legal entity performing lobbying activities is obliged to act in accordance with the principle of integrity when engaging in lobbying,” and in Article 13, paragraph 1, which stipulates that “A lobbyist or a legal entity performing lobbying activities is obliged to avoid conflicts of interest when engaging in lobbying.” If there is a suspicion of a conflict of interest as referred to in Article 13²³, the lobbyist is obliged, without delay, to terminate the lobbying contract until the suspicion of a conflict of interest has been resolved (Article 43, paragraph 1).

23 The existence of a conflict of interest is determined under Article 13, paragraph 2, based on the general principles of (1) representing two lobbying clients with opposing interests, and (2) when the lobbyist is a related person to the lobbied individual. A specific prohibition is prescribed in paragraph 5, which states that “A person who was employed by the lobbying client may not, in the course of lobbying conducted in the interest of that client, act as a lobbied person until two years have passed since the termination of employment with that client.”

A specific anti-corruption measure is contained in Article 38, which stipulates that a lobbyist must not offer a gift,²⁴ a right, service, or benefit to the lobbied person or any related person, another official, or public servant; a similar prohibition is also prescribed for lobbied persons and their related persons, who must not request or receive any gift, item, service, or other benefit offered by a lobbyist.

2.2 LEGISLATIVE FRAMEWORK FOR THE REPRESSION OF CORRUPTION

The legislative framework for the repression of corruption in Montenegro consists of a set of specific laws regulating the work of the prosecutorial and judicial branches of power in this field. The key among them are the Law on the Special State Prosecutor's Office, the Law on Courts, and the Law on the Seizure of Property Derived from Criminal Activity. Their provisions establish the institutional and legal mechanisms for handling cases of organized crime and high-level corruption, including specialized prosecutorial and judicial prosecution, as well as measures for the permanent confiscation of unlawfully acquired assets. In this way, a comprehensive system of repression is created, aimed at strengthening the rule of law and ensuring a more effective fight against the most serious forms of crime at the highest levels of power.

The Law on the Special State Prosecutor's Office – SSPO ("Official Gazette of Montenegro", Nos. 10/15, 53/16, and 54/24) regulates the organization and competences of the Special State Prosecutor's Office, the conditions and procedure for the selection of the Chief Special Prosecutor and special prosecutors, the relationship with other state bodies and administrative authorities, as well as other matters of importance for the work of the Special State Prosecutor's Office. The law was last amended in 2024 as part of the so-called IBAR legislative package. Following a public consultation held in May, the amendments and supplements²⁵ the scope of SSPO's competences was more precisely defined. Specifically, the legislator provided a detailed list of corruption-related criminal offences for which the SSPO holds exclusive jurisdiction when the perpetrators are high-ranking public officials (abuse of official position, fraud in office, unlawful influence, incitement to unlawful influence, passive bribery, and active bribery). In addition,

²⁴ A gift is also understood to include symbolic and protocol gifts within the meaning of the law governing the prevention of corruption.

²⁵ Available at: <https://www.sluzbenilist.me/propisi/730525E2-D917-49E4-8CF1-B37418490EB0>

the law now includes an exhaustive list of high-ranking public officials, thereby clearly specifying which concrete positions within the state hierarchy fall under the SSPO's jurisdiction (e.g., the President of the State, the President and Members of Parliament, members of the Government, judges and court presidents, state prosecutors and special prosecutors, heads of independent regulatory bodies or agencies, and others). These amendments further strengthened the role of the SSPO as the central institution in the fight against high-level corruption, eliminating previous ambiguities in practice regarding which prosecutorial body had jurisdiction over corruption cases involving top public officials.

The Law on Courts ("Official Gazette of Montenegro", Nos. 11/2015, 76/2020, and 54/2024) regulates the organization, jurisdiction, and internal structure of courts in Montenegro, as well as the fundamental principles of the judiciary. Its purpose is to ensure a unified and effective system of judicial protection for the rights of citizens and legal entities, while guaranteeing the independence, impartiality, and legality of court operations. The most recent amendments to the Law on Courts ("Official Gazette of Montenegro", No. 54/24)²⁶ the legislator further aligned the judicial framework with the specialization of the SSPO, thereby establishing an institutional basis for specialized judicial proceedings in cases of high-level corruption. This created a parallel special framework, prosecutorial and judicial, aimed at ensuring more efficient prosecution of the most severe forms of corruption at the highest levels of government. In this regard, Article 16, which regulates the jurisdiction of courts, was significantly amended to state that:

"Regardless of the rules on territorial jurisdiction, the High Court in Podgorica shall adjudicate in criminal proceedings for criminal offences, namely:

2) corruption offences when a high-ranking public official has committed the following criminal offences:

- abuse of official position,
- fraud in office,
- unlawful influence,
- incitement to unlawful influence,
- passive bribery,
- active bribery;

26 Available at: <https://www.sluzbenilist.me/propisi/AE2A4589-0D9C-4519-B5DB-D30668384370?page=1>

A high-ranking public official referred to in paragraph 2, point 2 of this Article shall be understood in accordance with the definition provided in the law regulating the organization and jurisdiction of the Special State Prosecutor's Office. For the adjudication of criminal offences referred to in paragraph 2 of this Article, a special department shall be established within the High Court in Podgorica."

The Law on Seizure and Confiscation of Property Acquired through Criminal Activity ("Official Gazette of Montenegro", Nos. 58/15, 47/19, and 54/24) regulates the conditions for the confiscation of property benefits obtained through criminal activity, the procedure for confiscation, as well as other matters of significance related to such confiscation. In addition, the law regulates the management of property benefits obtained through the commission of criminal offences, objects used in criminal offences, as well as property temporarily seized in criminal and misdemeanor proceedings, including property provided as bail. After the public consultation held in May 2024²⁷, The Law was last amended in July 2024 ("Official Gazette of Montenegro", No. 54/24), as part of the IBAR legislative package, with the aim of improving the framework for combating corruption and organized crime. In paragraph 2, the Law stipulates that property benefits may be confiscated if there is a reasonable suspicion that they were acquired through criminal activity and if their value amounts to at least €5,000. Additionally, the law introduces the institute of confiscation without a verdict, meaning that if criminal proceedings cannot continue (e.g., due to death, illness, or immunity), property valued at no less than €5,000 and suspected of being obtained through criminal activity may still be permanently confiscated.

Article 3 contains the definition of property benefit, while according to Article 4 of the Law, the procedure for confiscation of property benefits acquired through criminal activity may be conducted before, during, or after the conclusion of criminal proceedings.

Under the Law, the authority to initiate confiscation proceedings is vested exclusively in prosecutors, and the procedure is carried out in accordance with this Law and the Criminal Procedure Code. The prosecutor initiates a financial investigation if there is a reasonable suspicion that the property benefit was acquired through criminal activity (Article 11, paragraph 1), and if there are grounds to suspect that a criminal offence referred to in Article 2, paragraph 1 of this Law

27 Available at: <https://www.gov.me/dokumenta/fb72cb01-d1ea-4b0d-9b00-7f360e531536>

has been committed (Article 11, paragraph 2).

Applying these provisions, during the first six months of 2025, the High Court in Podgorica, acting upon motions filed by the Special State Prosecutor, ordered a series of temporary security measures banning the disposal of immovable property totaling 1,650,116 m², while in fourteen cases handled by the Special Prosecutor's Office, monetary assets were seized from commercial banks in Montenegro amounting to €62,622,291, 2,037,432 Russian rubles, 173,148 U.S. dollars, 624 Swiss francs, and 3,000 British pounds.²⁸

One of the shortcomings of this Law is the fact that it provides for the confiscation of illegally acquired property benefits only within the framework of criminal proceedings, and not through civil proceedings. In this regard, the Ministry of Justice established a Working Group for the analysis of the needs and possibilities of introducing a new civil-law model for the confiscation of illegal property (on March 4, 2025), which has so far held two meetings (on February 17 and May 15, 2025).²⁹

2.3 LAWS WITH ANTI-CORRUPTION ELEMENTS

In addition to the laws whose primary purpose is the prevention and repression of corruption, the legal system of Montenegro also includes other regulations that, although not directly aimed at combating corruption, contain significant anti-corruption elements. These laws introduce measures that increase transparency, strengthen control over public and private activities, and reduce opportunities for abuse of office or illegal actions. By incorporating electronic management systems, clear oversight procedures, and defined responsibilities for actors across various sectors, these regulations contribute to the broader anti-corruption framework, supporting the integrity of institutions.

The Law on Free Zones ("Official Gazette of the Republic of Montenegro", Nos. 42/04, 11/07, and "Official Gazette of Montenegro", Nos. 76/08, 40/11, 40/16) regu-

28 Available at: <https://www.cdm.me/hronika/sdt-u-14-predmeta-privremeno-blokirao-preko-62-miliona-eura-16-miliona-kvadrata-74-vozila/>

29 A comparative overview of civil-law models of property confiscation can be found in the analysis prepared by the Research Center of the Parliamentary Institute of the Parliament of Montenegro, published in June 2024 available at: <https://api.skupstina.me/media/files/1718868603-finansijska-istraga-i-gradanskopravno-oduzimanje-imovine-update.pdf#page=6.09>.

lates the establishment of free zones and free warehouses, as well as the conditions for conducting business activities within them. A working group was formed, with the support of British experts, to prepare a new Law, and the first draft was reviewed in February 2025. During its work, the group held 19 meetings, and the Draft Law on Free Zones was submitted for public consultation in June 2025.

The primary objective of drafting the new Law on Free Zones is to suppress illicit trade, strengthen customs supervision, and increase business transparency. Particular emphasis is placed on prohibiting the production, trade, and storage of tobacco and tobacco products within the zones, defining the conditions for granting approval for the establishment of a zone, determining the status of the founder, operator, and user of the zone, as well as mechanisms for enforcing customs control. In this regard, the adoption and implementation of this legislation are expected to reduce opportunities for illegal trade and tobacco smuggling, indirectly limiting the activities of organized criminal groups and reducing corruption.

The Law on the Government has been at the center of public debate in Montenegro for years; however, it has still not been adopted or implemented. It has been partially defined through the Draft Law on the Government prepared by the Ministry of Public Administration, in a process that lasted a little over two years. Work on the Law began in 2022, when the first working version was drafted, and after a series of alignments with GRECO recommendations and the opinions of the European and Venice Commissions, the final version of the Draft Law was submitted to the European Commission for review in early February 2025.

Although the European Commission issued a positive opinion in mid-June 2025, the General Secretariat of the Government had not yet prepared its opinion on the Draft Law, nor was the draft subsequently submitted to the Parliament for adoption by the end of the spring session of the Parliament of Montenegro in July 2025.

Once adopted and enacted, the Law on the Government is expected to play a significant role in Montenegro's anti-corruption policy, as it regulates the relationship between the Government and other public administration bodies, clearly defines the competences of ministers and other members of the Government, and introduces mechanisms for verifying the integrity of government members. This would establish an institutional framework that contributes to more transparent

and accountable governance while reducing opportunities for abuse of office.

The Law on Construction of Facilities ("Official Gazette of Montenegro", Nos. 19/25 and 92/25) regulates the manner and conditions for constructing buildings, the performance of construction activities, and other issues of relevance to construction. In the context of anti-corruption policies, the adoption of this law envisions the establishment of an electronic system for issuing building permits, as prescribed in Article 4, paragraph 1, which states: "Communication in the area of construction and licensing shall be conducted electronically, in accordance with the law governing electronic administration, electronic identification, electronic signature, and electronic documents, as well as this law."

The electronic building permit system is expected to play an important role in Montenegro's anti-corruption framework, as the digitalization of the permitting process reduces opportunities for discretionary decision-making and direct contact between officials and applicants, thereby lowering the risk of corrupt practices. Its implementation enables greater transparency of the procedure, clear deadlines, monitoring of each stage of the application, and publicly accessible information, contributing to equal treatment of all investors and strengthening trust in institutions.

However, Article 4, paragraph 2, allows investors to bypass electronic communication and documentation, stipulating that "If the applicant so requests, the application for the issuance of an administrative act (consent of the chief state architect or chief city architect, building permit, occupancy permit, or license) shall be submitted, and the administrative acts issued, in analog or written form."

The Law on Free Access to Information regulates in detail the right to access information as one of the fundamental political rights and freedoms of individuals, thereby constituting a key element of transparency in the work of state authorities. In this regard, the Law on Free Access to Information represents an important complementary mechanism in the fight against corruption, as it enables citizens, the media, and civil society to monitor the work of public institutions and timely uncover irregularities in their operations.

The law was first adopted in 2012 ("Official Gazette of Montenegro", No. 44/2012), and after amendments in 2017 ("Official Gazette of Montenegro", No. 30/2017), the area of free access to information became the subject of various legislative

initiatives, many of which remained marginal. None of the reforms introduced after 2017 reached the plenary session of Parliament, leaving numerous problems in the implementation of the law unresolved.

The most recent attempt to adopt the Draft Law on Amendments and Supplements³⁰ failed when the Legislative Committee, on February 29, 2024, issued an opinion declaring the proposal unconstitutional, given that it amended more than 50% of the provisions of the current law. It was concluded that such a proposal could not be submitted to parliamentary procedure as a Draft Law on Amendments and Supplements, but only as a draft of a new law.³¹

After the suspension of that process, in mid-2024, the Ministry of Public Administration once again initiated the drafting of a new legislative solution, which underwent public consultations in July of the same year.³² The final version of the Draft Law on Free Access to Information³³ was adopted at the session of the Government of Montenegro on January 23, 2025.

Health care in Montenegro has been continuously recognized as one of the sectors most vulnerable to corruption. According to data from the Anti-Corruption Strategy 2024–2028, between 2016 and 2022 the health care system was perceived as the area where corruption is most widespread in six out of eight years, with similar findings recorded in CeMI's survey conducted in May/June 2025. The main normative documents regulating this area are the **Law on Health Care and the Law on Medicines**. Full implementation of these laws should enable the establishment of a "track and trace" system for monitoring and supervising the medicine supply chain, increase transparency, and reduce the space for manipulation.

The Ministry of Health launched a public consultation on the **Draft Law on Health Care** in November 2024. After the public consultation was conducted³⁴, the anti-corruption measures envisaged in the Draft Law underwent certain amendments, the key one being the introduction of a four-year term limit for the Ethics

30 Government of Montenegro, No. 08-040/23-6104/4

31 Legislative Committee, Report on the Consideration of the Draft Law on Amendments and Supplements to the Law on Free Access to Information No. 23-3/24-1/3.

32 Available at: <https://www.gov.me/clanak/javni-poziv-za-konsultovanje-zainteresovane-javnosti-povodom-pripreme-predloga-zakona-o-slobodnom-pristupu-informacijama>

33 Available at: <https://www.gov.me/dokumenta/f3770721-0316-42eb-91de-2d4d8ce9f3b9>

34 Available at: <https://www.gov.me/dokumenta/662f19a1-ead5-4f64-9565-e052f0413822>

Committee. The Ethics Committee is a new body that should be established in all health care institutions, and one of its competences relates to providing opinions on conflicts of interest and the acceptance of gifts by health care workers. It is important to note that during the public consultation period, the Medical Chamber of Montenegro initiated a proposal to remove the anti-corruption measure explicitly prohibiting the acceptance of gifts valued over 50 euros, as well as securities or precious metals of any value, arguing that there is no mechanism for determining the value of such gifts.

The Law on Health Care (Official Gazette of Montenegro, No. 91/2025) was adopted by the Parliament of Montenegro on July 31, 2025, and introduces a number of new anti-corruption measures, the implementation of which will depend on the functionality of the newly established ethics committees. Section 2 of the Law includes Articles 112–116 and provides detailed regulation of this area. Article 112 defines the concepts of corruption and conflict of interest within the meaning of this law. Article 113 prohibits the abuse of positions in health care for the purpose of obtaining private gain. It also provides a broader definition of immediate family members than that found in the Law on the Prevention of Corruption, which applies to public officials, as it includes all children, stepchildren, and adopted children, regardless of whether they live in the same household as the health worker.

Article 114 establishes a complete ban on accepting securities and precious metals, regardless of their value, while paragraph 2 sets a limit for other symbolic gifts to a maximum value of 50 euros.

A safeguard mechanism for implementing these provisions is defined in Article 115, which obliges health workers to immediately inform the institution's ethics committee if there is suspicion of a violation of the aforementioned articles, so that appropriate procedures can be initiated. After the committee issues its opinion, if grounds exist, the institution's director may initiate disciplinary proceedings.

The competence to determine the existence of a conflict of interest is assigned to the mentioned ethics committee. The law prescribes the establishment of an ethics committee at the level of all health institutions, composed of five members elected for a four-year term. The Law defines a range of competences for the ethics committee, and in Article 84, paragraph 10, it explicitly stipulates its anti-corruption role through the competence to "issue opinions on conflicts of

interest or the acceptance of gifts and submit them to the director of the health care institution.”

The Law on Medicines underwent technical amendments through the Law on Amendments to the Law on Medicines (Official Gazette of Montenegro, No. 035/25 of April 2, 2025*), and is currently in the drafting phase of a new Law.³⁵ The full implementation of these two legislative solutions represents a prerequisite for the creation of a “track-and-trace” system for marking and monitoring medicines — from import to end users — which will significantly increase transparency and reduce the risk of corruption in this sector.

35 Available at: <https://www.gov.me/clanak/izvjestaj-o-sprovedenoj-javnoj-raspravi-nacrt-zakona-o-ljekovima>

3. STRATEGIC FRAMEWORK

3.1 STRATEGY FOR THE FIGHT AGAINST CORRUPTION 2024-2028

After several years of recommendations from the European Commission and other international partners, the Government of Montenegro adopted a new **Strategy for the Fight Against Corruption 2024-2028** in 2024. The drafting process of the strategy was strongly influenced by the obligations stemming from Negotiation Chapter 23, related to delivering measurable results in the fight against corruption. State institutions participated in its preparation, while the consultative process with civil society was limited and often formal in nature.

The general objective of the Strategy is the creation of a long-term and effective system for combating corruption, alongside the definition and strengthening of control mechanisms, to be achieved through specific strategic directions and goals, as well as through the identification of priority measures for establishing an efficient anti-corruption system. Specifically, the achievement of the general objective is elaborated through three strategic goals:

Strategic Goal 1: Ensure an independent, impartial, and accountable public sector that serves the interests of all citizens;

Strategic Goal 2: Guarantee respect for the rule of law through effective investigations and sanctioning of corruption cases;

Strategic Goal 3: Strengthen national and international cooperation and raise awareness in the fight against corruption.

Formally, the Strategy is intended to serve as the key document guiding state policy in combating corruption, considering that for almost a decade, since the expiration of the *Strategy for the Fight against Corruption and Organized Crime 2010-2014*, Montenegro had been without a comprehensive strategic document unifying and coordinating the efforts, activities, and responsibilities of all state institutions acting preventively or repressively against corruption.

During this vacuum period, between the expiration of the previous strategy and the adoption of the new one, the role of guiding anti-corruption policies was assumed by the *Action Plan for Chapter 23 – Judiciary and Fundamental Rights and*

the Operational Document for the Prevention of Corruption in Areas of Special Risk.

The Operational Document, adopted in March 2016, contained measures identified as unimplemented or partially implemented in the Action Plan for monitoring the 2010–2014 Strategy, as well as new measures defined by the representatives of the competent institutions. The following were recognized as areas of particular risk: *public procurement, privatization, urban planning, education, health care, local self-government, and the police.*

4. SOCIO-POLITICAL CONTEXT OF THE FIGHT AGAINST CORRUPTION IN MONTENEGRO

After the change of government in 2020, Montenegro entered a turbulent period of political instability, marked by frequent government changes and weak capacity to maintain political continuity. This development culminated in early parliamentary elections in 2023, after which the government of Milojko Spajić was formed in October. Although that government achieved a significant result in July 2024 by obtaining a positive IBAR report, political tensions remain pronounced both in the relationship between the ruling majority and the opposition, and within the ruling majority itself.

This political context directly affects the fight against corruption and the public perception of that fight, creating the impression that political instability limits the long-term consistency and sustainability of reform processes. Supporting this view is the fact that Montenegro has not moved on Transparency International's Corruption Perceptions Index, maintaining a score of 46 for the year 2024³⁶, which positions it as the best-ranked country in the region, yet still within the group of states classified as flawed democracies, far below the average score of 76 attributed to full democracies.³⁷

Political instability is best illustrated by the chronic inability to fill key positions in the areas of anti-corruption and the judiciary, a long-standing issue in Montenegro's political reality. One of the important steps forward was the appointment of the missing judges of the Constitutional Court in 2023/2024, which the European Commission and senior EU representatives highlighted as a significant factor contributing to the positive IBAR report.

However, problems with the Constitutional Court re-emerged at the end of 2024, when on December 17 the Parliament of Montenegro dismissed Judge Dragana Đuranović due to reaching the retirement age. This controversial decision resulted in a boycott of parliamentary work and the withdrawal of opposition MPs from

36 See: <https://www.antikorupcija.me/me/novosti/2502111342-crna-gora-najbolje-rangirana-regionu-po-percepciji-korupcije-izazovi-dalje-postoje/>

37 Available at: https://images.transparencycdn.org/images/CPI2024_Report_Eng1.pdf

the Committee for Comprehensive Electoral Reform, citing violations of constitutional and legal procedures in the process of confirming retirement eligibility. This interpretation was confirmed by the Venice Commission, which stated that “the Montenegrin Parliament should have respected the procedure requiring formal notification from the Constitutional Court regarding the fulfillment of conditions for the termination of a judicial function.”³⁸ The political crisis was temporarily set aside following an agreement between Prime Minister Spajić and the parliamentary opposition that the recommendations of the Venice Commission — concerning amendments to the Law on the Constitutional Court, aimed at clarifying the legal ambiguities regarding the fulfillment of retirement conditions for judges — would be placed on the agenda in due course.

However, confrontations over the election of Constitutional Court judges resurfaced in mid-September 2025, when the President of the Parliament, Andrija Mandić, convened an extraordinary parliamentary session to discuss President Milatović’s proposal for the appointment of a Constitutional Court judge. The agenda of the session, however, was not adopted, and as a result, the President’s proposal was not discussed. This turn of events once again brought political divisions to the forefront and placed renewed attention on the functioning of the Constitutional Court, which currently operates with a reduced composition of four out of seven judges, just enough to maintain the quorum required for decision-making.

Additionally, appointments to key positions within the system and the stabilization of institutions remain unresolved issues. Although the Government has been operating with a full mandate since October 2023 — nearly two years — a permanent Director of the Police Administration has yet to be appointed. At an electronic session of the Government held on June 16, 2025, Lazar Šćepanović was appointed for the second time as Acting Director of the Police Administration, for a period of six months³⁹, unlike his first appointment as acting director, which received unanimous support from the Government, this time the ministers from the Democratic People’s Party (DNP) withheld their support.

A similar situation exists with the Agency for the Prevention of Corruption. Fol-

38 Venice Commission, CDL-AD(2025)029-e, p.13, [https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2025\)029-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2025)029-e)

39 See: <https://www.vijesti.me/vijesti/crna-hronika/762850/scepanovic-ponovo-izabran-za-vd-direktora-uprave-policije>

Following the arrest of the Agency's Director, Jelena Perović, in April 2024, the institution has been operating in an acting capacity. In August 2024, the Council of the Agency appointed Dušan Drakić as Acting Director, and he has been serving in that role pending the Council's decision on the selection of a permanent director through a public competition. The Council of the Agency announced the public competition on April 1⁴⁰, and after the legal deadline of 20 days for applications expired, two individuals applied for the position: the current acting director, Dušan Drakić, and Milica Milutinović. In May 2025, the Council conducted interviews with the candidates but failed to reach a decision, as neither Drakić nor Milutinović received the required majority of votes⁴¹ for the position of director in full mandate⁴². Despite announcements that a new public competition would soon be announced, the Council of the Agency for the Prevention of Corruption (APC) had not published a new public call as of the end of September 2025. In the meantime, the work of the Council, as well as the entire Agency, became burdened with additional controversies following the judgment of the Administrative Court in case U. No. 6009/25 of May 16, 2024, which upheld the lawsuit filed by Jelena Perović from Podgorica and annulled the decision of the Council of the Agency for the Prevention of Corruption No. 00-2188/6 of August 15, 2024, on her dismissal from the position of Director of the Agency. Acting upon the judgment, the Council of the Agency, at its 35th session, unanimously decided to send Jelena Perović a Request for Statement on the reasons for her dismissal and decided to reject her Request for Suspension of the dismissal procedure⁴³. At its 40th session, with the votes of all members of the Agency's Council present, a conclusion was adopted to suspend the procedure for adopting a decision based on the annulment reasons stated in the Judgment of the Administrative Court of Montenegro, case U. No. 6009/24 of May 16, 2025, due to the expiration of Jelena Perović's mandate on July 25, 2025, thereby effectively acknowledging that Perović had remained in office until that date.

40 Available at: <https://www.antikorupcija.me/me/savjet-agencije/novosti/2504010609-javni-konkurs-za-izbor-direktora-agencije-za-sprecavanje-korupcije/>

41 During 2025, the Ministry of Justice worked on preparing amendments to the Law on the Prevention of Corruption, with one of the key changes, retained after the completion of the public consultation, being the modification of the voting system in the Council of the Agency, shifting from a qualified majority (four out of five votes) to a simple majority (three out of five votes) when voting for the election of the Council's president and vice president, as well as the director of the Agency for the Prevention of Corruption.

42 Available at: <https://www.antikorupcija.me/me/savjet-agencije/novosti/2505231317-saopstenje-33-sjednice-savjeta-ask/>

43 Available at: <https://www.antikorupcija.me/me/savjet-agencije/novosti/2506061345-saopstenje-35-sjednice-savjeta-ask/>

The work of the Parliamentary Anti-Corruption Committee has also not remained immune to political controversy. In April 2025, the Parliament of Montenegro ratified two interstate agreements by adopting the Draft Law on the Ratification of the Agreement between the Government of Montenegro and the United Arab Emirates (UAE) on Cooperation in Tourism and Real Estate Development. The content of these agreements raised concerns both domestically and internationally, as key provisions allow investors from the UAE to be exempted from Montenegrin laws regulating public procurement, tenders, and competition protection. This creates room for potential abuses and the favoritism of certain investors⁴⁴, and the fact that it is stipulated that land for selected projects will be provided “without the need to conduct public procurement procedures, public tenders, or other procedures prescribed by national legislation governing state property” means that state-owned land will be sold or leased through direct, behind-closed-doors agreements opens vast opportunities for corruption⁴⁵. Although a discussion was planned, the Anti-Corruption Committee was prevented from expressing its position on the content of these agreements, as the 14th session of the Committee was not held due to a lack of quorum.⁴⁶

This brief overview of political developments contributes to an atmosphere of impunity and a perception of inefficiency in the work of key anti-corruption bodies in Montenegro. In such an environment, the supervisory role of the Agency for the Prevention of Corruption (APC) comes under pressure, as non-compliance with the provisions of the Law on the Prevention of Corruption can occur even at the highest levels of state authority. For example, acting upon a report submitted by MANS, the Agency indisputably determined that Zoran Radović, President of the High Court within which the Special Department competent for cases of organized crime and high-level corruption operates, failed to submit the regular annual report on income and assets for 2022, as well as the report on asset increases exceeding 10,000 euros, within 30 days from the occurrence of the change — an obligation he had under the Law on the Prevention of Corruption.⁴⁷ A similar violation was found in the asset declarations of state prosecutor Andri-

44 Available at: <https://www.slobodnaevropa.org/a/transparency-international-crna-gora-emirati/33427592.html>

45 Available at: <https://www.mans.co.me/sta-donosi-novi-sporazum-sa-uae-zemljiste-bez-tendera-i-kapital-sumnjivog-porijekla/>

46 See: <https://www.skupstina.me/me/clanci/odbor-za-antikorupciju-nije-odrdao-14-sjednicu-zbog-nedostatka-kvoruma>

47 APC, Odluka UPI-02-03-36-24 Zoran Radović

jana Nastić from the Higher State Prosecutor's Office, where it was determined that Nastić violated the Law on the Prevention of Corruption by failing to report several real estate properties in her annual and special asset reports.⁴⁸ Nastić failed to report two garages, each 13 square meters in size, in her income and asset report for 2023, nor did she declare an apartment in the report for 2022. She also did not submit a special report within 30 days of the change in her property status, even though she became a co-owner of an apartment of 69 square meters and a garage of 16 square meters, later the owner of an apartment of 96 square meters, while her husband inherited an apartment. Members of Parliament also failed to report changes in their assets as required by law. Opposition MP Ivan Vuković did not report the purchase of a car within the legally prescribed period⁴⁹ while ruling coalition MP Darko Dragović failed to submit income and asset reports for 2022 and 2023.⁵⁰

Additionally, the President of Montenegro, Jakov Milatović, was also subject to a detailed review by the Agency for the Prevention of Corruption (APC). In the decision UPI-02-03-83/7-24⁵¹ it was determined that Article 25, paragraph 2 of the Law on the Prevention of Corruption was violated, as accurate and complete information had not been reported—specifically, income from a service contract amounting to €2,093.36. In another decision from 2022, it was concluded that the Law on the Prevention of Corruption had been breached because, in his 2020 Income and Asset Report, Jakov Milatović failed to declare 247 shares in "Montenegro Express Group" AD Budva and did not report a passenger vehicle, a *Renault Clio* with registration number PG AP 128, owned by his wife.

This decision was annulled by the Administrative Court (case U.br. 1831/23) in a judgment dated 11 February 2025, whereby the court upheld the lawsuit filed by Jakov Milatović and overturned the decision of the Agency for the Prevention of Corruption, No. UPI 02-03-375/6-2022 of 27 October 2022, due to procedural deficiencies in the conduct of the proceedings. Although the Agency's mandate is to ensure compliance with asset disclosure obligations and prevent conflicts of interest, frequent disputes and court rulings overturning its decisions create a perception of inefficiency and legal uncertainty.

48 APC, [Odluka UPI-02-03-35-24](#)

49 APC, [Odluka UPI-02-03-12-24](#)

50 APC, [Odluka UPI-02-03-14-24](#)

51 APC, [Odluka UPI-02-03-83-7-24-Jakov Milatović](#)

In the area of implementation and enforcement of repressive measures in the fight against corruption, some progress has been noted; however, this segment is characterized by two distinct trends. The **first trend** is reflected in the activities of the Special State Prosecutor's Office (SSPO) and the Police Directorate, which have initiated numerous proceedings for criminal offenses in the area of high-level corruption⁵², particularly in the area relating to the abuse of official position.

- At the order of the Special Prosecutor's Office of Montenegro, former Chief Special Prosecutor Milivoje Katnić and former high-ranking police official Zoran Lazović were arrested early on Sunday, April 14, as confirmed to Radio Free Europe (RFE) by the Special Prosecutor's Office. "Katnić and Lazović were deprived of liberty on suspicion of committing the criminal offenses of creating a criminal organization and abuse of official position," stated Vukas Radonjić, spokesperson for the Special Prosecutor's Office.⁵³
- The Special State Prosecutor's Office filed an indictment against Nikola Raičević for alleged membership in a criminal organization formed by Miloš Medenica in 2019, which includes former Supreme Court President Vesna Medenica, on suspicion that he mediated in corrupt agreements related to cigarette smuggling.⁵⁴
- Acting on a criminal complaint filed against unknown persons for abuse of official position, the Special Police Department in March 2025 questioned former Minister of Spatial Planning, Urbanism, and State Property Janko Odović in connection with irregularities surrounding the construction of a tower at the Adriatic Fair and a luxury high-rise building in Bar.⁵⁵
- Acting on the order and in coordination with the Basic State Prosecutor's Office in Herceg Novi, the police in Herceg Novi filed a criminal complaint against the former director of the Public Health Institution (PHI) Health Center Herceg Novi on suspicion of having committed the criminal offense of prolonged abuse of official position. It is suspected that A.Đ. (44), who served

52 In 2024, the Special State Prosecutor's Office (SSPO) received 5.07% fewer reports falling under its jurisdiction compared to 2023. Within the total number of reported offenders, organized crime accounted for 14.03%, high-level corruption for 72.78%, money laundering for 2.40%, while 10.79% involved other criminal offenses within the competence of this prosecutor's office. (see: Judicial and Prosecutorial Council report for 2024)

53 Available at: <https://www.slobodnaevropa.org/a/milivoje-katnic-hapsenje/32904631.html>

54 Available at: <https://www.pobjeda.me/clanak/raicevic-optuzen-da-je-dogovarao-mito-za-vesnu-medenicu>

55 See: <https://www.vijesti.me/vijesti/crna-hronika/748278/bivsi-ministar-janko-odovic-pozvan-na-saslusanje-u-specijalno-policijsko-odjeljenje>

as acting director of the PHI Health Center Herceg Novi from 2022 to 2023 and as director from 2023 to 2024—during which period he allegedly committed the offense—used his official position unlawfully and exceeded his official authority to gain benefits for himself and others, thereby causing damage to the PHI Health Center Herceg Novi.⁵⁶

- On July 28, 2025, officers of the Special Police Department (SPO) searched the premises of the Danilovgrad Police Department on the order of the Special State Prosecutor's Office (SSPO). On that occasion, the head of the Danilovgrad Security Department, Marko Drobnjak, was arrested, while several individuals in Podgorica, Bar, and Danilovgrad are under investigation on suspicion of having committed the criminal offenses of forming a criminal organization, abuse of official position, and others.⁵⁷
- In June 2025, the Special State Prosecutor's Office submitted an indictment to the Special Department of the High Court in Podgorica for the continued criminal offense of money laundering against former police official Duško Koprivica and associated persons.⁵⁸
- Officers of the Sector for the Fight Against Crime – Department for Combating Corruption, Economic Crime, and Conducting Financial Investigations, in cooperation with officers of the Regional Security Center "North" – Berane Security Department, as part of the operation codenamed "ČEKIĆ" ("HAMMER"), filed on March 31, 2025, a criminal complaint with the Basic State Prosecutor's Office in Berane against the former head of the Forest and Hunting Management Administration, Berane Branch, Ž.V. (62) from Berane, on reasonable suspicion of having committed the criminal offense of abuse of official position, thereby causing material damage to the Forest and Hunting Management Administration of Montenegro in the amount of over €62,000.⁵⁹

However, despite this intensive activity in the investigation and prosecution phases, the **second trend** indicates that the final outcome of many court proceedings in practice often results in acquittals. Such outcomes—whether due to procedural shortcomings, insufficiently strong evidence, or legal uncertainties—

56 See: <https://www.cdm.me/hronika/bivsi-direktor-doma-zdravlja-u-herceg-novom-osumnjicen-za-zloupotrebu-polozaja/>

57 See: <https://www.vijesti.me/vijesti/crna-hronika/765909/akcija-sdt-i-spo-pretresene-prostorije-danilovgradske-policije-uhapsen-nacelnik-marko-drobnjak>

58 See: <https://www.vijesti.me/vijesti/crna-hronika/763769/sdt-podnijelo-optuznicu-protiv-duska-radosave-i-strahinje-koprivice-i-duska-roganovica>

59 See: <https://www.antenam.net/drustvo/hronika/361160-krivicna-prijava-protiv-bivseg-rukovodioca-uprave-za-sume-pj-berane-osumnjicen-da-je-ostetio-budzet-za-62-000-eura>

raise serious questions about the overall efficiency of the system. Acquittals in high-profile cases not only diminish the perceived effectiveness of the judiciary but also contribute to an atmosphere of impunity, thereby eroding public trust in the institutions responsible for combating corruption. In this context, during 2024 and 2025, a number of verdicts were delivered acquitting former high-ranking state officials of the charges against them.

- The Court of Appeals of Montenegro, after the public session of the panel held on February 4, 2025, rendered a judgment rejecting as unfounded the appeal of the Special State Prosecutor's Office and upholding the judgment of the High Court in Podgorica – Special Department Ks.br. 10/23 of July 22, 2024. Thus, the verdict acquitting the accused, former Mayor of Podgorica Miomir Mugoša, of the charge of abuse of official position became final.⁶⁰
- Former Telekom directors Oleg Obradović and Miodrag Ivanović were acquitted today by the High Court, in a retrial following the annulment of the initial verdict by the Court of Appeals. They were cleared of charges alleging abuse of office and causing €2.3 million in damages to the company they managed, as claimed by the Special State Prosecutor's Office.⁶¹
- Former Director of the Real Estate Administration, Dragan Kovačević, was acquitted of charges of forming a criminal organization with the intent to unlawfully seize land in the coastal zone. The verdict was delivered by the panel of the High Court in Podgorica, presided over by Judge Zoran Radović, in September 2025. Alongside Kovačević, his close associates were also acquitted. The indictment of the Special State Prosecutor's Office included Ana Lakićević Grdinić, Danko Kovačević, Sanja Popović, Aleksandar Boljević, and the Podgorica-based company "Geo&Arh." They were charged with forming a criminal organization, unlawful land seizure, multiple counts of abuse of official position, document forgery, and extortion.⁶²
- The defendants in the "Envelope" affair, including businessman Duško Knežević and former Mayor of Podgorica Slavoljub Stijepović (DPS), were acquitted by the High Court in Podgorica in April 2025. The "Envelope" case refers to a secretly recorded video released by Knežević in 2019, allegedly showing Stijepović receiving an envelope containing €100,000 intended to

60 See: <https://www.antenam.net/drustvo/hronika/356848-potvrdjena-presuda-viseg-suda-miomir-mugosa-oslobodjen-optuzbe-da-je-zloupotrijebio-sluzbeni-polozej>

61 See: <https://www.antenam.net/drustvo/hronika/355611-presuda-bivsim-direktorima-telekoma-obradovic-i-ivanovic-oslobodjeni-optuzbe>

62 See: <https://www.cdm.me/hronika/kovacevic-osloboden-optuzbi/>

finance the Democratic Party of Socialists' (DPS) campaign ahead of the parliamentary elections at that time.⁶³

- A case of particular significance concerns the so-called "Apartments" affair. The defendants in the "Apartments" case were acquitted in the first-instance verdict of charges that, as members of the Government's Housing Commission operating from 2016 to 2020, they had abused their official positions over an extended period. The indictment of the Special State Prosecutor's Office (SSPO) in this case included former ministers Predrag Bošković, Budimir Šegrt, Suad Numanović, Sanja Vlahović, Ivan Brajović, Damir Šehović, Dragica Sekulić, Osman Nurković, Suzana Pribilović, Jelena Radonjić, Aleksandar Jovičević, and the head of the President's Cabinet, Dražen Miličković. Judge Vesna Kovačević of the High Court in Podgorica stated that the SSPO had failed to provide credible evidence against the defendants. According to her, the court could not consider copies of case files as admissible evidence, as doing so would violate the defendants' right to a fair trial.⁶⁴

On the other hand, cases resulting in final convictions of high-ranking officials in Montenegro remain rare. One notable exception is the decision from June 2025, when the Prosecutorial Council dismissed temporarily suspended Special State Prosecutor Lidija Mitrović after the Court of Appeals upheld the verdict of the High Court in Podgorica, sentencing her to seven months in prison for the continued criminal offense of abuse of official position⁶⁵. Also, in the same month, former executive director of the Budva Parking Service, Dragan Liješević, was sentenced in the first-instance verdict to one year and three months in prison, with an additional obligation to repay €120,218 to the company, also for the continued criminal offense of abuse of official position.⁶⁶ These cases, although representing important precedents, remain exceptions within a practice largely characterized by acquittals, lengthy proceedings, and repeated delays.

63 See: <https://www.antenam.net/drustvo/hronika/362424-oslobadjajuca-presuda-optuzeni-ma-u-aferi-koverta-akovic-sud-donio-zakonitu-odluku>

64 See: <https://www.cdm.me/hronika/oslobodeni-optuzbi-svi-okrivljeni-u-predmetu-stanovi/>

65 See: <https://www.vijesti.me/vijesti/crna-hronika/761434/tuzilacki-savjet-rezrijesio-specijal-nu-drzavnu-tuziteljku-lidiju-mitrovic>

66 See: <https://www.vijesti.me/vijesti/crna-hronika/761387/lijesevic-osudjen-na-godinu-i-tri-mjeseca-zatvora-ali-i-da-vrati-120000-eura>

5.OVERVIEW OF THE IMPLEMENTATION OF ANTI-CORRUPTION POLICIES (2024-2025)

With the adoption of the new strategic document, the **Strategy for the Fight Against Corruption 2024-2028** nearly ten years after the previous one expired, Montenegro has finally established a framework for the creation and implementation of anti-corruption policies. Through the implementation of this Strategy over a four-year period, activities should be carried out that will cumulatively contribute to achieving the overall goal of creating a long-term and effective system for combating corruption, while defining and strengthening control mechanisms.

The Strategy envisions a range of concrete activities, as well as coordination among a large number of institutions, both at the local and national levels, which makes the planned reforms comprehensive but also complex in terms of implementation and coordination. Based on the Action Plan for the 2024-2025 period, the following section provides an overview of the implementation of anti-corruption policies as of the second quarter of 2025, i.e., one year into the Strategy's implementation.

At the very beginning of this chapter, it should be noted — despite significant inaccuracies in the Strategy and the Action Plan regarding the description of activities and indicators for monitoring progress — that even with a favorable interpretation of the achieved results, only 21.1% of the total activities were fully implemented during the first year of the Strategy's implementation, 41.1% were partially implemented, 9.5% were not implemented, while 28.2% were not yet due for implementation.

5.1 STRATEGIC OBJECTIVE 1 - STRENGTHENING THE INDEPENDENCE, IMPARTIALITY, AND ACCOUNTABILITY OF INSTITUTIONS INVOLVED IN THE FIGHT AGAINST CORRUPTION

Within Strategic Objective 1, the adoption of a set of laws and by-laws is envisaged, in accordance with GRECO recommendations, European Commission reports, Council of Europe analyses, recommendations from the European Commission's 2021 Peer Review mission, and ODIHR recommendations. These documents relate to key preconditions for the continuous and effective work of bodies involved in the fight against corruption, through a set of five operational objectives, with corresponding activities and indicators:

- OC 1.1. Improvement of the normative framework for preventing corruption
- OC 1.2. Strengthening the administrative and institutional framework for preventing corruption
- OC 1.3. Establishment of a system of employment and promotion in public authorities based on criteria and merit
- OC 1.4. Strengthening capacities for implementing anti-corruption measures in areas of particular risk of corruption
- OC 1.5. Transparency and free access to information

5.1.1 - OC 1.1 - IMPROVEMENT OF THE NORMATIVE FRAMEWORK THAT GUARANTEES THE FIGHT AGAINST CORRUPTION

During 2024, the Draft Law on Amendments to the Law on the Prevention of Corruption was finalized and adopted by the Parliament on June 7, 2024. These amendments are particularly significant due to Chapter III of the Law, which regulates the procedure for submitting whistleblower reports and handling them, thereby strengthening the protection of whistleblowers in Montenegro's anti-corruption system. However, the opportunity for a comprehensive reform was missed, as evidenced by the fact that by the end of the same year, work began on drafting a new version of the Law. This document underwent public consultation and was submitted to the European Commission for review at the beginning of 2025. The law is expected to be submitted to parliamentary procedure by the end of 2025.

As part of the so-called IBAR laws package, the Law on Lobbying was also adopted in 2024. In addition, after almost a year and a half of intensive work by the Working Group within the Committee for Comprehensive Electoral Reform, and despite significant political disagreements, the Law on the Financing of Political Parties and Election Campaigns was adopted in July 2025.

On the other hand, the Ministry of Economic Development was late in drafting the Proposal for Amendments to the Law on Free Zones, which was planned to be completed by the end of the first quarter of 2025. The main purpose of this law is to combat illicit trade, strengthen customs supervision, and increase business transparency. After 12 meetings of the working group, the draft law was sent for public consultation, which ended in July 2025, but only in the form of a draft, since the scope of amendments exceeded the harmonization planned by the Action Plan.

The greatest delay was recorded in relation to the Draft Law on the Government, whose adoption is delaying the passage of by-laws in accordance with the recommendations of international partners. Although the process was supposed to be completed by the end of 2024, the draft law was submitted to the European Commission for review in February 2025. However, even after receiving a positive opinion, the public consultation process has not yet begun.

In terms of by-laws, certain activities have been implemented. The Code of Ethics for Customs Officers (No. I/1-3753/1-24) and the Rulebook on the Control of Property, Income, and Lifestyle of Police Officers were adopted. On the other hand, the adoption of the Code of Ethics for Judges is delayed, while the Commission for the Code of Ethics of State Prosecutors was only established in February 2025, after which the drafting process began. Similarly, a working version of amendments to the Code of Police Ethics has been prepared, but it has not yet been formally adopted.

Regarding specific activities related to Operational Objective 1.1, 36.3% have been implemented, 36.3% partially implemented, 9% not implemented, and 18% have not yet become due. However, the implementation of activities is not fully aligned with the general indicators for assessing the achievement of Operational Objective 1.1, among which the key indicator refers to the adoption of all planned laws, with the Action Plan expecting 100% completion of this indicator by the end of 2025. All of the above indicates partial progress in the normative framework but

also significant delays and insufficient alignment of implemented activities with planned obligations, which may jeopardize the timely fulfillment of objectives by the end of 2025.

5.1.2 - OC 1.2 - STRENGTHENING THE ADMINISTRATIVE AND INSTITUTIONAL FRAMEWORK FOR THE FIGHT AGAINST CORRUPTION

A key recommendation for improving the institutional framework in the field of anti-corruption is contained in Recommendation No. 7 from the 5th GRECO Evaluation Round, which refers to the capacities of the Agency for the Prevention of Corruption (APC). GRECO notes that “in order to ensure the full operational independence and efficiency of the Agency, it is necessary to further strengthen administrative capacities by providing independent, merit-based recruitment procedures, including integrity testing for new staff; increasing the number of permanent employees to a level corresponding to internal rules and workload.”

In this context, in October 2024, the APC Council adopted a new Rulebook on Internal Organization and Systematization of Job Positions, which foresees 98 posts, while only 54 positions were filled at that time. This created the framework to increase staffing levels from about 30% (2024) to a targeted 50% by the end of 2025. Although the 2025 budget allocated funds for new hires, no new employees were hired by the end of the second quarter of 2025. The Agency submitted a request to the Ministry of Finance for consent to announce a competition for six positions, and in the first quarter of 2025, it published job postings for three positions. Additionally, the APC was obliged to establish procedures for integrity checks of new employees by the end of the first quarter. In cooperation with the Council of Europe, a draft technical document—a “checklist” for integrity—was prepared, and its implementation began in May 2025.

In the field of transparency, the APC adopted a new reporting template which, unlike earlier versions, includes both qualitative and quantitative indicators regarding conflicts of interest, asset verification, integrity plans, lobbying, political party financing, and whistleblower protection. The 2024 report represents the first document of this type, though the reporting methodology still requires refinement. Additionally, at the end of 2024, the APC sent guidelines to municipalities to appoint authorized persons for receiving whistleblower reports, in accor-

dance with the Law. At a meeting with the Union of Municipalities, it was noted that 42 local government bodies had appointed authorized persons, but some municipalities still had not established internal procedures for handling reports. With the entry into force of the Law on the Prevention of Corruption on June 12, 2025, the process of reporting and handling whistleblower reports was formally regulated. Within this operational objective, the Agency is tasked with preparing a detailed analysis of practice in this area. A working version of the document has been prepared but is not yet publicly available; its publication is expected by the end of 2025.

The Ministry of Justice was obliged to establish a system for analyzing corruption risks in the legislative drafting process. Between July and December 2024, the Ministry issued 20 opinions on CPL forms (preliminary corruption risk assessments), while from January to April 2025, an additional 10 opinions were prepared. Although some progress has been recorded, there is still no data on the extent to which the CPL form has become an integral part of the legislative process. Regarding the appointment of "special advisers" to the Prime Minister and Deputy Prime Ministers, as well as state secretaries, the Commission for Personnel and Administrative Affairs obtains certain certificates and documentation to assess candidates' suitability and potential conflicts of interest. However, there is no unified and formalized integrity verification procedure. The Agency has also not prepared Guidelines for Determining Conflicts of Interest, which remains an open issue.

In summary, regarding Operational Objective 1.2, 33.3% of activities have been implemented, 55.6% partially implemented, and 11.1% not implemented. As for the general indicators of achievement for Operational Objective 1.2, it is planned to increase the staffing level of the Agency for the Prevention of Corruption from 50% to 80% in accordance with interim rules and workload. As previously noted, the APC currently has 54 filled positions out of 98 systematized, and during 2025, approval was obtained from the Ministry of Finance and a competition announced for three positions. Although certain progress has been made in strengthening the APC's capacities and implementing activities under Operational Objective 1.2, the insufficient pace of recruitment and delays in implementation indicate that the target of 80% staffing by the end of 2025 is unlikely to be achieved.

5.1.3 - OC 1.3 - ESTABLISHING A SYSTEM OF EMPLOYMENT AND PROMOTION IN PUBLIC ADMINISTRATION BASED ON MERIT AND COMPETENCE

The overarching document for establishing a merit-based system of employment and promotion is the Law on Civil Servants and State Employees. The Ministry of Public Administration of Montenegro worked on drafting and adopting the Proposal for Amendments to this Law between the second quarter of 2024 and the first quarter of 2025, which introduces a meritocratic employment system. The proposal was submitted to the European Commission for opinion on November 27, 2024, and the Government reviewed and adopted it at a session held on February 20, 2025, along with the Report from the public consultation process.

The Administrative Inspection plays a key role in overseeing the implementation of legal provisions on employment and promotion. During 2024, 525 initiatives were received, of which 120 remained unresolved. In 118 cases, reports were drafted with recommendations for correcting irregularities, while in 14 cases, formal decisions were issued ordering their correction. Additionally, eight penalty acts were issued. During the third and fourth quarters of 2024, eight inspections were carried out concerning the processes of public announcements, employment, and job filling, while in the first quarter of 2025, no such inspections were conducted (UPI 01-037/25-562-3).

The Human Resources Administration is responsible for conducting assessments of candidates' knowledge, abilities, competencies, and skills. In 2024, 344 reports were prepared on oral interviews with candidates. However, it remains unclear how many reports were prepared on interviews with heads of institutions, although such interviews are also conducted. In total, 360 decisions on candidate selection were made, but it is not known whether these decisions included explanations in accordance with the Law on Administrative Procedure, which remains an important point for further analysis.

Within the operational objective, continuous training of individuals in high executive positions on standards of legal and ethical integrity was also planned. Under the 2024 integrity managers program, the Human Resources Administration trained 21 individuals, only one of whom belonged to the category of high-level managerial staff (VRK). This indicates that the activity was implemented to a much lesser extent than planned and must be significantly strengthened and

better targeted toward the addressees of the Action Plan — individuals in senior executive positions.

According to available data, 16.6% of activities under Operational Objective 1.3 were fully implemented, 66.7% were partially implemented, and 16.6% were not yet due for implementation. Although progress has been made in preparing the normative framework and strengthening the institutional framework for merit-based employment, the slow pace of implementation, limited transparency in procedures, and insufficient training of key managerial staff indicate that the goals set out in the Action Plan have not yet been achieved to a degree that would ensure a genuine transformation of the public administration system.

5.1.4 - OC 1.4 - STRENGTHENING CAPACITIES FOR IMPLEMENTING ANTI-CORRUPTION MEASURES IN AREAS OF PARTICULAR CORRUPTION RISK

The Anti-Corruption Strategy identifies several sectors with a particularly high risk of corrupt practices and defines targeted activities to reduce these risks. Priority sectors include customs, construction and spatial planning, inspections, healthcare, and public procurement.

One important step is the advancement of digitalization in container transport through the integration of the Port of Bar into the SEED+ system. SEED+ (Systematic Exchange of Electronic Data) is a regional IT platform that enables data exchange between the customs administrations of the Western Balkans and the European Union. Its purpose is to enhance cross-border cooperation, accelerate the flow of goods, and strengthen customs control, thereby reducing opportunities for corruption and smuggling. The integration of the Port of Bar is a significant step forward, but further improvements in functionality are needed to ensure full oversight and transparency of processes. In the area of customs and tax administration, integrity tests have not yet been introduced, although this measure is envisaged by the Action Plan as a tool for strengthening institutional resilience to corruption.

The establishment of an electronic building permit system represents a key measure for reducing corruption in the construction sector. The gradjevinskadozvola.me platform and the AI chatbot Maša represent the first steps toward digitalizing

this process. However, they are currently mainly informational and not functional as an electronic service for the submission and processing of applications. Full digitalization would eliminate the counter-based system for submitting documentation, which remains one of the main sources of potential corrupt practices.

In the field of inspection oversight, the November 2024 Act on Systematization of the Ministry of Spatial Planning, Urbanism and State Property increased the number of inspectors in the southern region's urban-planning and construction inspection from 15 in 2023 to 21 in 2024, thus partially improving inspection capacity. However, with the entry into force of the Law on Construction of Buildings and the Law on Spatial Planning on March 7, 2025, the competences of urban and construction inspectors were separated. This requires amendments to the systematization act, and during the three-month transition period, inspections are being carried out by the existing urban-construction inspectors.

In the health sector, the establishment of a "track and trace" system for medicines is planned, which would allow monitoring of the flow of medicines from the manufacturer to the end user, reducing the risk of corruption and the black market. The prerequisites have been partially met: the Law on Health Care has been adopted, while the Law on Medicines has passed the public consultation process but has not yet been adopted. The system can only be implemented after the adoption of this law.

Although the development of a "red flags" system for public procurement, designed to automatically detect corruption risks in procurement procedures, was planned, this tool is still not operational. The centralized electronic public procurement system currently only allows users to report conflicts of interest or collusion among participants during procurement procedures.

In summary, only 4.7% of planned activities have been fully implemented, 38.1% partially implemented, 4.7% not implemented, while 52.4% have not yet reached the implementation stage. In high-risk sectors, progress has been partial — most evident in the digitalization of customs procedures and initial steps in building permits and healthcare. However, delays in the normative framework, the lack of integrated electronic services, and the absence of key preventive tools (such as integrity tests or the red flags system) indicate that the planned measures have not yet produced their full intended effect in reducing corruption risks.

5.1.5 - OC 1.5 - TRANSPARENCY AND FREE ACCESS TO INFORMATION

The overarching document regulating this area is the Law on Free Access to Information. The Government of Montenegro, at its session held on January 23, 2025, adopted the Draft Law on Free Access to Information and submitted it for further procedure. This law is crucial for strengthening legal guarantees in the field of transparency and access to information of public importance. The Agency for Personal Data Protection and Free Access to Information (AZLP) plays a central role in implementing this law. Despite defining the strengthening of AZLP's human and technical capacities as one of the priority activities in this area, no new staff were hired in the Department for Free Access to Information during 2024. In the context of capacity building, AZLP, in cooperation with the Council of Europe, organized a training session in Podgorica in November 2024 on international standards and national regulations regarding access to official information.

In the context of transparency and participation in the process of creating normative solutions, the Government of Montenegro adopted, on November 15, 2024, the Report on the Implementation of the Regulation on the Selection of NGO Representatives in Working Bodies of State Administration and the Conduct of Public Consultations in the Preparation of Laws and Strategies for 2023. The report indicates that only 32.86% of acts under preparation in ministries went through a public consultation process, while as many as 10% of regulations subject to mandatory public consultation were exempted. This data reveals serious shortcomings in the consistent application of the principles of participation and transparency. An additional activity in this area, not foreseen by the Action Plan, refers to the initiative of the Ministry of Public Administration, which at the end of June 2024 formed an operational team for Open Government, tasked with drafting and monitoring the implementation of the National Action Plan for the Open Government Partnership (OGP). The draft action plan was submitted for public consultation in September 2025, representing a positive step forward, but systematic inclusion of civil society and citizens is still needed.

The IT platform "Number of Employees in Public Administration" was launched and made operational, containing data disaggregated by central and local levels. The platform is updated quarterly, increasing transparency and enabling the monitoring of employment dynamics within the public administration.

At the local level, a unified framework for conducting public consultations has still not been established. Local self-governments lack a common document or rulebook outlining procedures for public consultations, although the Decision on the Participation of Local Population in the Exercise of Public Affairs is in place, which in practice also applies to public consultations. The tendency among local self-governments is to define participation rules within each individual call for consultation.

According to the implementation plan, 14.3% of activities have been completed, 57.1% have been partially completed, and 28.6% have not yet reached the implementation stage. Although the normative framework has been improved by the adoption of the Draft Law on Free Access to Information, institutional and staffing challenges, inconsistent practices in conducting public consultations, and disparities at the local level continue to limit genuine transparency and participatory governance in Montenegro.

5.2 - STRATEGIC OBJECTIVE 2 - ENSURE RESPECT FOR THE RULE OF LAW THROUGH EFFECTIVE INVESTIGATIONS AND SANCTIONING OF CORRUPTION CASES

To build trust in institutions, and primarily as a deterrent mechanism, institutions must have sufficient resources available to detect and investigate corruption cases. The knowledge and skills of individuals in state bodies responsible for conducting investigations must be of a high level, in order to increase the number of indictments, first-instance and final convictions for corruption cases, especially at the high level, as well as the permanent confiscation of assets related to corruption cases.

The achievement of this goal is envisaged through the implementation of specific operational objectives:

- OC 2.1. Improvement of legislation in the fight against corruption
- OC 2.2. Strengthening the capacities of institutions responsible for combating corruption

5.2.1 - OC 2.1 - IMPROVEMENT OF LEGISLATION IN THE FIGHT AGAINST CORRUPTION

In the period 2024–2025, the legislative framework for the repressive fight against corruption was amended as part of the so-called IBAR legislative package. The amendments introduced a new system for prosecuting high-ranking public officials and established mechanisms for the confiscation of assets acquired through criminal activity.

Key legislative solutions include the Law on Amendments to the Law on the Special State Prosecutor's Office, the Law on Amendments to the Law on Courts, and the Law on Amendments to the Law on the Confiscation of Assets Acquired through Criminal Activity. The Law on Amendments to the Law on the Special State Prosecutor's Office defines the jurisdiction of the Special State Prosecutor's Office (SSPO) for prosecuting perpetrators of corruption crimes when committed by high public officials, with a precise definition of the term "high-ranking official." According to the Report on the Work of the Prosecutorial Council and the State Prosecutor's Office for 2024, the SSPO assigned 13 special prosecutors to cases involving "organized crime and high-level corruption."⁶⁷

The Law on Amendments to the Law on Courts stipulates that the High Court in Podgorica shall have jurisdiction over criminal proceedings for corruption involving high-ranking public officials, regardless of the rules on territorial jurisdiction, within the framework of the Special Department of the High Court. This Special Department is established specifically for such cases, thereby enhancing the specialization and efficiency of judicial proceedings. As of mid-September 2025, the Special Department of the High Court was handling 166 cases involving a total of 1,121 individuals. The High Court has also significantly strengthened its human resources capacity, as the Judicial Council, at its sixth session, appointed five new judges⁶⁸, and in September, one more judge was appointed, increasing the total number of judges from 12 to 18.

The Law on Amendments to the Law on the Confiscation of Assets Acquired through Criminal Activity regulates the procedure for confiscating assets, including movable and immovable property. Confiscation procedures represent one of

⁶⁷ Available at: https://sudovi.me/static/tzsv/doc/lzvjestaj_DT_i_TS_za_2024_godinu.pdf

⁶⁸ Available at: <https://sudovi.me/sdsv/sadrzaj/7D3q>

the most effective instruments for reducing corrupt gains and strengthening the rule of law. In the previous sections of this report, data were presented on the temporary seizures of movable and immovable property in Montenegro during 2025, approved by the High Court in Podgorica at the request of the Special State Prosecutor's Office (SSPO), in a total amount exceeding 65 million euros.

Within this operational objective, the preparation of an analysis on the confiscation of property benefits acquired through criminal activity in civil proceedings is also envisaged, under the competence of the Ministry of Justice, and is currently in progress.

In terms of the implementation of the Anti-Corruption Strategy, this operational objective has shown the greatest progress compared to other goals, with 75% of activities fully implemented and 25% partially implemented. In this context, the legislative amendments and the establishment of specialized mechanisms enable the concrete application of repressive measures. While data indicate that Montenegro has made visible progress in the area of repressive anti-corruption efforts, thereby creating a stronger legal framework for prosecuting high-ranking public officials and protecting the public interest, what remains lacking is the completion of these proceedings with final, convicting court judgments.

5.2.2 - OC 2.2 - STRENGTHENING THE CAPACITIES OF INSTITUTIONS RESPONSIBLE FOR COMBATING CORRUPTION

Within this operational objective, the strategy identified the need to create the technical conditions for the operation of the Anti-Corruption Department within the Ministry of the Interior, which is responsible for monitoring employees of the Ministry and the Police Administration. The Strategy also envisions the establishment of a new organizational unit dedicated to preventing all forms of corrupt behavior among customs officers, in the form of an Internal Control Department. However, according to available information, the public procurement process for equipping this department within the Ministry of the Interior has not yet been conducted, which limits its operational readiness.

Additionally, the Ministry of the Interior is responsible for conducting integrity checks of all police officers prior to appointment and promotion. In this regard, the Ministry prepared a list of 708 individuals with valid applications to the public call for the implementation of a special recruitment procedure from January 2025,

within which they were required to submit a completed questionnaire on assets and income,⁶⁹ for integrity verification.

The Draft Fiscal Strategy 2024–2027 prepared by the Ministry of Finance envisioned the establishment of the Financial Police as a key body for combating financial misconduct. In November 2024, a document titled *Cooperation between the Financial Police and Montenegrin Authorities – Establishing a New Economic-Financial Police Body* was prepared. By amending the Rulebook on the Internal Organization and Systematization of the Tax Administration on March 26, 2025, a Sector for Determining and Collecting Unreported Income of Natural Persons was established as a transitional solution until the legal foundations for the Financial Police are adopted. However, one year after the adoption of the Strategy, the regulatory prerequisites for establishing the Financial Police have still not been met, and there are no clear indications of the timeframe for its establishment.

To strengthen capacities, training sessions were organized for judges, prosecutors, and associates involved in combating corruption. Partial training sessions on financial investigations were conducted in cooperation with the Center for Training of Judges and Prosecutors. In parallel, during 2024 and 2025, training sessions were also held for government officials: four trainings on procedures for handling whistleblower reports for officials of the Ministry of the Interior and the Police Administration. However, the ambitious goal of having 40% of officials complete these trainings has not been achieved. Two training sessions for integrity managers were organized in the first quarter of 2025 by APC in cooperation with the Human Resources Administration. Three training sessions on the topic Prevention and Repression of Corruption at Border Crossings were held during the fourth quarter of 2024, attended by 39 officers from the Police Administration and the Customs Administration.

According to the implementation plan, 11.1% of activities have been completed, 55.6% partially completed, 11.1% not completed, while 22.2% of activities have not yet reached the implementation phase. Although some progress has been made in strengthening institutional capacities for combating corruption, significant challenges remain in terms of unit equipment, regulatory framework, and staff training, which require urgent action to ensure full implementation of planned activities.

69 Available at: <https://www.gov.me/dokumenta/b4a49e7c-0491-44c5-a0af-888a6bf2ee9e>

5.3 - STRATEGIC GOAL 3 - STRENGTHENING NATIONAL AND INTERNATIONAL COOPERATION AND RAISING AWARENESS IN THE FIGHT AGAINST CORRUPTION

One of the key problems identified within this strategic goal is the need to improve the system for managing European Union financial assistance in Montenegro's accession process. For the effective absorption of all types of financial aid, with a focus on preventing corruption and fraud in its use, a comprehensive digitalization of the monitoring, control, accounting, and reporting systems is necessary. This information system should function as a permanent, unified database encompassing all project contracts throughout their entire lifecycle, ensuring transparency and efficiency in fund management.

In addition, it is crucial to intensify cooperation with European Union member states and countries in the region in the coming period. This cooperation entails establishing direct links through the organization of training sessions for prosecutors, police officers, and other members of the AFCOS network, thereby strengthening capacities for combating financial misconduct and enhancing international coordination.

The fulfillment of this strategic goal is planned through the implementation of specific operational objectives:

- OC 3.1. Strengthening international cooperation in the prevention and fight against corruption
- OC 3.2. Improving the efficiency of data exchange between competent authorities to prevent and combat corruption
- OC 3.3. Increasing awareness of the forms, harmfulness, and reporting methods of corruption, and strengthening the capacities of institutions responsible for combating corruption in terms of communication with the public

5.3.1 - OC 3.1 - STRENGTHENING INTERNATIONAL COOPERATION IN THE PREVENTION AND FIGHT AGAINST CORRUPTION

Within the Action Plan, international cooperation is focused on three key areas: cooperation with the European Public Prosecutor's Office (EPPO), data exchange through the UNODC's GlobE network, and the development of IT solutions for identifying and handling assets acquired through criminal activity. Montenegro,

as a candidate country for European Union membership, has the status of a “third country” in relation to EPPO. The Supreme State Prosecutor’s Office (SSPO) formalized cooperation by signing an agreement with EPPO in September 2022. As of March 2025, the SSPO became an associate member of the NADAL network of prosecutors from EU member states, further strengthening institutional connections. During 2025, EPPO organized training sessions for Montenegrin prosecutors and members of the Police Administration, which contributed to improving capacities for combating transnational crime and corruption.

The Special State Prosecutor’s Office (SSPO) is an active user of the UNODC’s GlobE network, which enables transnational cooperation in corruption cases. The SSPO appointed a contact point for coordinating activities within this network. During 2024, three pieces of information were exchanged with competent institutions from Pakistan, Hong Kong, and South Korea. Additionally, the Agency for the Prevention of Corruption (APC) received one request for data from the competent institution of Hungary through the same network.

In the area of developing software solutions for identifying assets acquired through criminal activity and for verifying property based on foreign requests, no progress has been recorded. The planned IT solutions have not been developed, which represents a significant challenge for effective handling of such cases.

According to the review of activities, 40% of the planned activities within this operational objective have been fully implemented, 20% partially implemented, 20% not implemented, and 20% have not yet reached the implementation phase. Although significant progress has been achieved in cooperation with EPPO and in the use of the UNODC GlobE network, the lack of progress in developing IT solutions limits the full potential of international cooperation in the fight against crime and corruption, requiring additional efforts in the coming period.

5.3.2 - OC 3.2 - IMPROVING THE EFFICIENCY OF DATA EXCHANGE BETWEEN COMPETENT AUTHORITIES TO PREVENT AND COMBAT CORRUPTION

Within this operational objective, the plan envisions improving mechanisms for the efficient exchange of data between institutions responsible for the prevention and fight against corruption. The key activity involves preparing a detailed analysis of the current situation regarding the functioning and potential for automatic data and information exchange between relevant bodies. This analysis should identify existing capacities, technical and procedural barriers, as well as potential areas for improvement, in order to enable faster and more efficient coordination.

However, the implementation of this objective faces significant challenges. A detailed analysis of the possibilities for establishing automatic data exchange among competent authorities for the prevention and repression of corruption has not been carried out, which has prevented the next step, that is, establishing interoperability among registries necessary for automatic data and information exchange.

In addition, the amendment of the Agreement on Enhanced Cooperation in the Area of Criminal Matters concerning automatic data exchange, which would enable the integration of the ARO office (Asset Recovery Office), has not yet begun. Instead, the agreement signed in 2021 remains in force. The only significant progress has been achieved in establishing a national coordination mechanism for integrated monitoring and reporting on foreign requests for identifying assets acquired through criminal activity, as the Special State Prosecutor's Office (SSPO) has been included in the reporting process to the European Commission via an e-platform.

According to the implementation status review, 25% of the planned activities have been implemented, 50% have not been implemented, and 25% have not yet reached the implementation stage.

5.3.3 - OC 3.3. - INCREASING AWARENESS OF THE FORMS, HARMFULNESS, AND REPORTING METHODS OF CORRUPTION, AND STRENGTHENING THE CAPACITIES OF INSTITUTIONS RESPONSIBLE FOR COMBATING CORRUPTION IN TERMS OF COMMUNICATION WITH THE PUBLIC

To achieve this operational objective, the plan envisages launching a national campaign targeting citizens, public sector employees, and especially children and young people, with the goal of raising awareness about the importance of integrity and the fight against corruption.

As part of this campaign, the Agency for the Prevention of Corruption (APC) organized training sessions for integrity managers in the education sector during April 2025. The first cycle of training was attended by 69 representatives of educational institutions from Podgorica, Zeta, Cetinje, Tuzi, and Danilovgrad. In the second cycle, 63 participants from Bar, Budva, Ulcinj, Kotor, Tivat, and Herceg Novi took part. These training sessions aimed to strengthen the capacity of integrity managers to promote ethical behavior and integrity in educational institutions.

The Bureau for Education developed a lesson plan for class community sessions aimed at students in grades VII, VIII, and IX of primary schools and grades I, II, III, and IV of secondary schools. This plan is designed to introduce students to the concept of corruption and the importance of ethical behavior through interactive activities tailored to their age group.

The Ministry of Education, Science, and Innovation published on April 4, 2025, key findings from a study on corruption in education conducted in May and June 2018. The full report is available on the Bureau for Education's website. However, given the time elapsed, there is a clear need for new research to update the data and identify current challenges in this area.

As a significant step in combating corruption, a free hotline for reporting corruption in education was launched on April 1, 2025, at the number 080 070 070, enabling citizens and employees to anonymously report irregularities. Additionally, a case study was developed on the need to introduce the subject Ethics and Integrity in primary and secondary education. Although this study is not yet publicly available, it represents an important step toward institutionalizing integrity education.

Within this operational objective, 22.2% of planned activities have been implemented, 22.2% partially implemented, 11.1% not implemented, while 44.5% of activities have not yet reached the implementation stage.

5.4 ANTI-CORRUPTION POLICIES OUTSIDE THE FRAMEWORK OF THE ANTI-CORRUPTION STRATEGY 2024-2028

During 2024, Montenegro intensified its reform efforts in the area of the rule of law, resulting in preparations for the closure of interim benchmarks in Cluster I of the EU accession negotiations. Following the receipt of a positive IBAR and the establishment of final benchmarks for Chapters 23 and 24, the working group for negotiation chapters within Cluster I, in cooperation with relevant institutions, prepared action plans for Chapters 23 and 24, which were adopted by the Government of Montenegro in May 2025.⁷⁰ This process was completed with a slight delay compared to the original deadlines, mainly due to the need for additional consultations with EU experts and domestic stakeholders. The Action Plan for Chapter 23 specifically outlines a set of measures and activities aimed at fulfilling Final Benchmark 2, which concerns the fight against high-level corruption, including prevention, investigation, and sanctioning. These measures include strengthening the capacities of the prosecution service, improving transparency in public procurement, and reforming the judiciary.

In terms of anti-corruption reforms, the process of drafting these plans was aligned with the recommendations of the Group of States against Corruption (GRECO) of the Council of Europe. In its fourth round of evaluation, GRECO issued 11 recommendations to Montenegro, some of which have been implemented through national strategies. The Agency for the Prevention of Corruption (APC) prepared in March 2025 an Action Plan for monitoring the implementation of the United Nations Convention against Corruption (UNCAC) and GRECO recommendations for 2025⁷¹. This document provides for regular monitoring of progress, focusing on the prevention of corruption among members of parliament, judges, and prosecutors, as well as strengthening integrity in the public sector. One of the significant steps in 2025 was the enhancement of international coop-

70 Available at: <https://www.gov.me/clanak/usvajanje-akcionih-planova-za-zavrsna-mjerila-u-pregov-arackim-poglavljima-23-i-24-kljucni-korak-ka-evropskoj-buducnosti-crne-gore>

71 Available at: https://www.antikorupcija.me/media/documents/AP_UNCAC_i_GRECO_final.pdf

eration. At the 30th meeting of the Steering Group of the Anti-Corruption Network for Eastern Europe and Central Asia (ACN) of the Organisation for Economic Co-operation and Development (OECD), held on July 9, 2025, in Paris, Montenegro officially joined the Istanbul Anti-Corruption Action Plan (IAP)⁷². This membership provides access to best practices, peer review evaluations, and support in implementing anti-corruption reforms. Additionally, in May 2025, the Agency for the Prevention of Corruption (APC) obtained provisional membership status in the International Association of Anti-Corruption Authorities (IAACA)⁷³, a global network of institutions committed to the consistent application of international standards and the strengthening of cooperation. Full membership is expected at the IAACA General Assembly in December 2025. This represents an important step, as it enables the exchange of information, training, and coordination with over 100 member states worldwide, including countries from the EU and Asia.

During 2025, the Ministry of Justice initiated the procedure for drafting the Law on the Protection of Whistleblowers, with the aim of regulating this area through a separate legislative framework. The intention is to extract Chapter III from the existing Law on the Prevention of Corruption — which deals with reporting, handling of reports, and protection of whistleblowers — and to improve it in accordance with EU directives and GRECO recommendations. The public consultation⁷⁴ on the draft law was held in June 2025. During the consultation, participants emphasized the need to strengthen protections against retaliation, enable anonymous reporting, and introduce financial rewards for providing relevant information. The adoption of the law is expected by the end of 2025.

72 See: <https://www.antikorupcija.me/me/novosti/2507180547-crna-gora-pristupila-istanbuls-kom-akcionom-planu-okviru-acn-oecd/>

73 See: <https://www.antikorupcija.me/me/novosti/2505281334-ask-postala-clanica-medjunarodne-antikorupcijske-mreze-iaaca-jacanje-globalnog-partnerstva-borbi-protiv-korupcije/>

74 Available at: <https://www.gov.me/clanak/nacrt-zakona-o-zastiti-zvzdaca>

RECOMENDATIONS

STRENGTHENING THE INDEPENDENCE AND AUTONOMY OF KEY INSTITUTIONS

1. *Increase the independence and autonomy of the Agency for the Prevention of Corruption (APC):* Ensure the unhindered work of the Agency without political influence, including protection from pressure by the Parliament, Government, or other institutions.
2. *Announce a public competition for the election of the APC Director:* The Agency Council should urgently announce a public competition for the election of the Director for a full term, with a transparent procedure and evaluation of candidates based on professional and integrity criteria.
3. *Independence of the Special State Prosecutor's Office (SSPO):* Strengthen the autonomy of the SSPO through legal and administrative measures that limit direct interference from the Chief State Prosecutor and political structures.
4. *Respect for the obligations of the Parliament of Montenegro towards the APC:* The Parliament must announce public calls for members of the APC Council in a timely manner and respect the Agency's autonomous position, without introducing new practices not prescribed by law, including voting on the Agency's Annual Report.
5. *Preservation of the APC's budgetary independence:* The Government and the Parliament must ensure that the APC retains the guaranteed 0.2% of the total state budget to protect the institution's financial autonomy and independence.

STRATEGIC PLANNING AND IMPLEMENTATION OF ANTI-CORRUPTION POLICIES

6. *Improve the implementation of the Anti-Corruption Strategy 2024-2028:* Especially regarding the planning and adoption of the 2025-2026 Action Plan. Precisely revise the baseline, align activities and performance indicators, and establish an effective monitoring and reporting mechanism.
7. *Transparent reporting:* Publish regular, publicly available reports on the implementation of the Action Plan for the Anti-Corruption Strategy, as well as the Action Plan for Chapter 23. Avoid ad hoc changes to the reporting system

and ensure consistent progress monitoring.

8. *Accelerate the implementation of obligations from the Accession Program 2025-2026:* Especially within Chapter 23, focusing on strict adherence to deadlines and the establishment of a public monitoring mechanism for final benchmarks and indicators.
9. *Preliminary control of corruption risks:* Introduce the CPL checklist as mandatory in the drafting process of laws and ensure its consistent application in the development of all legislative solutions, to identify and mitigate potential corruption risks in time.
10. *Legislative amendments for the clear categorization of public officials:* Urgently adopt amendments to the Law on the Prevention of Corruption and prepare bylaws that categorize public officials and define their obligations in line with this law.

HUMAN RESOURCE MANAGEMENT AND ETHICS

11. *Fair compensation for integrity managers:* Ensure legislative changes and redefine the professional tasks of integrity managers, including appropriate compensation and a professional work environment.
12. *Adoption of the Code of Ethics:* Accelerate the adoption of the Code of Ethics for all state institutions to ensure uniform rules of conduct and integrity among civil servants.
13. *Strengthening the capacity of the APC:* Continue the functional strengthening of all internal structures of the Agency, including the implementation of the Human Resource Management Action Plan and professional staff development.

COORDINATION AND INSTITUTIONAL INTERCONNECTEDNESS

14. *Improve inter-institutional coordination:* Enhance cooperation mechanisms among the National Anti-Corruption Council, the Ministry of Justice, the APC, the Prosecutor's Offices, and other relevant bodies to ensure more effective supervision and implementation of the Anti-Corruption Strategy Action Plan.
15. *Formalization of cooperation:* Sign memoranda/agreements on cooperation and develop standardized coordination procedures among institutions responsible for prevention and repression of corruption, in line with activities from the Action Plan for Chapter 23.
16. *Regular communication between the APC and the Prosecutor's Offices:* Estab-

lish direct communication channels, including liaison officers or joint working groups, for a more efficient and unified response to corruption challenges.

TRANSPARENTNOST, NADZOR I BORBA PROTIV KORUPCIJE U PRAKSI

17. *Accelerate asset confiscation:* Improve the legal framework and procedures for confiscation of assets acquired through criminal activity, including the introduction of civil confiscation and enhanced management of confiscated assets.
18. *Database of court judgments:* Establish a dedicated public database of rulings in confiscation cases to increase transparency and accountability.
19. *Electronic public procurement system:* Continue improving CeJN, including linking it with other state registries, implementing the “red flags” system, and enhancing real-time monitoring.
20. *Misuse of state resources in election campaigns:* Strictly enforce the ban on employment and contractual engagement during election campaigns and limit the promotion of political entities using state resources.

PROTECTION OF WHISTLEBLOWERS AND LOCAL ANTI-CORRUPTION POLICY

21. *Strengthening whistleblower protection:* Urgently adopt the Law on the Protection of Whistleblowers. Create a safe environment for handling whistleblower reports and prescribe special guarantees against retaliation.
22. *Consistent handling of whistleblower reports:* Establish standardized procedures at both national and local levels to ensure the effective processing of reports.
23. *Alignment with GRECO recommendations:* Continuously update legislation and practice in line with GRECO recommendations.
24. *Linking anti-corruption reforms with EU integration:* Ensure that anti-corruption reforms remain sustainable after EU accession through coordination with Chapters 23 and 24.

