



**Recommendations  
for harmonization of anti-corruption policies in  
Bosnia and Herzegovina  
with the general principles of the Strategy for  
the fight against corruption 2024-2028.**

East Sarajevo, September 2024

On the basis of Article 11 and in connection with Article 22 of the Law on the Agency for Prevention of Corruption and Coordination of the Fight Against Corruption ("Official Gazette of BiH", number: 103/09 and 58/13), bearing in mind the Decision on the adoption of the Strategy for the fight against corruption 2024-2028. and the Action Plan for the implementation of the Strategy adopted at the 52nd session of the Council of Ministers of Bosnia and Herzegovina ("Official Gazette of Bosnia and Herzegovina", number: 50/24), which was held on 18 June 2024. , the Agency for the Prevention of Corruption and Coordination of the Fight Against Corruption (hereinafter: the Agency) adopts:

**RECOMMENDATIONS  
FOR HARMONIZATION OF ANTI-CORRUPTION POLICIES IN BIH  
WITH THE GENERAL PRINCIPLES OF THE STRATEGY FOR THE FIGHT AGAINST  
CORRUPTION 2024-2028.**

## **INTRODUCTION**

At the 52nd session of the Council of Ministers of Bosnia and Herzegovina, held on June 18, 2024, the Strategy for the fight against corruption 2024-2028 was adopted. (hereinafter: Strategy) and Action Plan for its implementation (hereinafter: Action Plan), based on the proposal of the Agency. This decision is aligned with 14 key priorities required for BiH membership in the European Union, whereby the fight against corruption is recognized as a key challenge for the rule of law, self-sustaining economic development and the quality of life of citizens in BiH.

The strategy has a mission to support the development, adoption, promotion and implementation of anti-corruption activities and the coordination of institutions and bodies for the prevention of corruption in Bosnia and Herzegovina, the detection and prosecution of corrupt crimes, and the application of good practices and international standards.

With the adoption of the Strategy, a general framework was created for the systemic and comprehensive fight against corruption, which implies the determination of priority areas for action, but also certain initial commitments and methods of joint action.

The state strategy for the fight against corruption is not only a source of general principles, but also a framework for the fight against corruption, which, taking into account the constitutional structure and competences of all levels of government in BiH, should ensure the coordinated implementation of agreed anti-corruption policies in BiH.

The Law on the Agency establishes the obligation to coordinate and supervise the implementation of the Strategy and the Action Plan (Article 10 point b.), as well as the

mandatory cooperation of all institutions and agencies at all levels, public services and other bodies with public powers with this Agency (Article 24.).

Objectives of the document "Recommendations for harmonizing anti-corruption policies in BiH with the general principles of the Strategy for the fight against corruption 2024-2028." are:

- Support for the consistent fulfillment of the legal obligation to respect the general principles of the strategy in the development of anti-corruption policies at the level of entities, cantons and Brčko District of BiH(*Article 22 of the Law*).
- Harmonization of anti-corruption policies in Bosnia and Herzegovina with general principles while respecting the standardized activities defined in the Strategy and Action Plan.
- Raising to a higher level of coordination and cooperation in anti-corruption efforts in Bosnia and Herzegovina.
- Improving the efficiency and consistency of the implementation of anti-corruption measures.
- Ensuring compliance of anti-corruption policies with European standards at all levels of government in BiH.

This document contains a framework and detailed instructions for adequate harmonization of anti-corruption policies in BiH, with the aim that all levels of government in BiH timely fulfill legal obligations and take responsibility for the fight against corruption at the appropriate level of government in BiH. At the same time, the document enables the preservation of full autonomy and ownership of the process of fighting corruption, in accordance with the competences of all levels of government in BiH.

The document also provides a detailed overview of potential modalities and indicators for the application of general principles and their incorporation into anti-corruption policies in BiH, as well as an overview of standardized activities common to all levels of government, with detailed operational recommendations for their implementation.

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## Overview of general principles and strategic priorities in Bosnia and Herzegovina

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Respecting the constitutional and administrative arrangement of BiH, as well as the fact that all levels of government in BiH should develop and adopt anti-corruption policies in accordance with the general principles of the State Strategy, and in order to ensure the timely and effective implementation of coordinated anti-corruption policies, the Strategy defined the following general principles:

- **The principle of political will-** The fight against corruption is a priority activity of the institutions in BiH, which requires the necessary political will and determination to solve the problem of corruption in the most efficient way.
- **The principle of zero tolerance towards corruption-** This is the basic principle that indicates that there must be no tolerance towards corrupt actions. This means that corruption will not be tolerated in any case, regardless of the circumstances, segments of life and work or persons involved in corrupt activities.
- **The principle of a unique and global vision-** The fight against corruption is based on a common understanding of the problem and giving a systemic response in accordance with the global attitude towards the problem of corruption.
- **The principle of the rule of law-** Obliges institutions to respect the Constitution and consistently implement laws and legal regulations without exception, as well as the provisions of international agreements (international legal instruments) to which BiH is a signatory.
- **The principle of compliance, coordination and cooperation-** The practices and procedures of the fight against corruption will be based on a unique concept of cooperation between the public and private sectors, international organizations in BiH, civil society and citizens.
- **The principle of responsibility-** Includes responsibility for timely and consistent implementation of anti-corruption policies, providing information on implementation for the purpose of supervision, assessment of the degree of implementation of the defined policy and its effects.

- **The principle of continuity of implementation of system activities-** It represents the continuation of the implementation of systemic activities in the fight against corruption, which are of a permanent nature.
- **The principle of proactive transparency-** This principle contributes to the realization of the concept of good administration in BiH, restores public trust in the work of institutions, and provides citizens with greater information. The public administration should, on its own initiative, enable the availability of data and information of public importance. All procedures and decisions related to the management of public resources should be open and accessible to the public, which enables citizens and the media to follow the activities of the authorities and institutions, and discover and report potential corrupt practices.
- **Principle of efficiency-** The principle of efficiency is crucial in the development and implementation of the Strategy because it ensures that resources, time and efforts are directed to the most effective measures that will yield the best results in combating corruption. Applying the principle of efficiency will ensure that limited resources are used in the best possible way to achieve significant results in the fight against corruption.
- **The principle of non-discrimination and respect for the freedoms and rights of citizens-** all activities in the process of drafting and implementing the Strategy and Action Plan will contribute to the realization of human freedoms and rights of citizens in accordance with the Constitution of Bosnia and Herzegovina and entity constitutions, as well as laws and international legal standards.

In order to ensure the consistent application of the general principles of the Strategy at all levels of government in Bosnia and Herzegovina, it is crucial to establish an approach that enables their practical and coordinated implementation through specific activities, which is one of the goals of this document. The general principles of the State Strategy provide a sufficiently broad conceptual framework that enables their adaptation and implementation through strategic anti-corruption documents at all levels of government in BiH. In connection with the obligation to harmonize anti-corruption policies of entities, cantons and Brčko District of BiH with the general principles of the State Strategy, a detailed overview of potential modalities and indicators for the application of those principles is presented below.

## PRINCIPLE OF POLITICAL WILL

*Description:* Without political will and support as a key element in the fight against corruption, there are no serious results and efforts, and as such it should be more than a declarative statement. Through the development and implementation of strategic anti-corruption documents, the level of political will and determination can be tested so that the results in the fight against corruption are more convincing and visible.

### **Potential modalities/indicators of application of the principles:**

- Improvement of the normative framework of the fight against corruption and accountability mechanisms for implementation anti-corruption activities.
- Ensuring financial and human resources for the implementation of anti-corruption measures.
- Ensuring the transparency of decision-making.
- Reports on progress and evaluation of the results achieved in the fight against corruption.

## PRINCIPLE OF ZERO TOLERANCE TO CORRUPTION

*Description:* This principle implies that corruption will not be tolerated in any form, regardless of the circumstances, sectors or persons involved in corrupt activities. Zero tolerance should be consistently applied in all phases of the fight against corruption. Strategies and action plans should be designed so that they reflect the principle of zero tolerance through concrete measures and activities. These documents should define how this principle will be applied in practice in particular, ensuring that all reports of corruption are treated with the highest level of seriousness and responsibility.

### **Potential modalities/indicators of application of the principles:**

- Ensuring consistent application of regulations.
- Establishing mechanisms for quick and efficient response to corruption reports, including investigative and legal proceedings.
- Equal treatment of all cases of corruption, regardless of the status or position of the suspects.
- Education and campaigns to raise awareness about the importance of reporting corrupt activities.
- Ensuring transparency in investigative and criminal processes, and regular reporting on taken measures and results.

## THE PRINCIPLE OF A UNIQUE AND GLOBAL VISION

*Description:* This principle emphasizes the importance of a coordinated and comprehensive approach in the fight against corruption, which links local, regional and international aspects. This principle ensures that all levels of government in BiH and relevant actors work together towards common goals, using a single general framework for the fight against corruption. Strategic anti-corruption documents should reflect this unified vision, showing how local, regional and international efforts align with clear roles and responsibilities.

### **Potential modalities/indicators of application of the principles:**

- Developing and implementing mechanisms for coordination and cooperation between different levels of government, sectors and international organizations in order to harmonize all efforts.
- Establishing uniform frameworks, standards and guidelines to ensure coherence and efficiency in the fight against corruption.
- Adherence to international recommendations and best practices to ensure compliance with global standards and norms.
- Ensuring transparent and regular communication between all relevant actors in the fight against corruption, including the public, and to enable the exchange of information and experiences.
- Defining common goals and priorities in the fight against corruption that will be recognized and accepted at all levels of government and in all relevant sectors.

## THE PRINCIPLE OF THE RULE OF LAW

*Description:* This principle requires that all anti-corruption efforts comply with laws, legal norms and international obligations, ensuring fair and consistent application. Strategic anti-corruption documents should clearly reflect the obligation to respect the legal framework, including the constitution, laws and international agreements, with the implementation of mechanisms for their implementation and monitoring.

**Potential modalities/indicators of application of the principles:**

- Developing and implementing mechanisms for consistent application of the law in all aspects of the fight against corruption, regardless of the status or position of the perpetrator.
- Ensuring compliance of the legal framework with international standards and obligations.
- Ensuring the independence of judicial bodies and other institutions that are key to the fight against corruption.
- Ensuring mechanisms to protect the rights of those who report corruption or are in some way affected by corrupt practices.
- Increasing transparency in legal proceedings and the responsibility of competent authorities, so that everyone procedures related to the fight against corruption are publicly available and subject to supervision.

**THE PRINCIPLE OF COORDINATION, COORDINATION AND COOPERATION**

*Description:* This principle ensures that the fight against corruption is based on a unified and coordinated approach, including cooperation between different sectors, levels of government, international and civil organizations. Strategic documents should clearly define mechanisms for coordination and cooperation in order to ensure the effective implementation of anti-corruption measures.

**Potential modalities/indicators of application of the principles:**

- Developing and implementing mechanisms for effective communication and cooperation between different levels of government and relevant sectors.
- Ensuring that anti-corruption strategies and standardized measures are aligned at all levels authorities and with international standards.
- Active involvement of civil society, international organizations and other key actors in the fight against corruption.
- Optimizing the use of resources through a coordinated approach to maximize results anti-corruption initiatives.
- Establishing clear procedures and channels for communication and information exchange among all actors involved in the fight against corruption.

**PRINCIPLE OF RESPONSIBILITY**

*Description:* This principle emphasizes the need for clearly defined responsibilities and obligations in the fight against corruption. Strategic documents should include mechanisms for monitoring, reporting and evaluating the implementation of anti-corruption policies, in order to ensure transparency and accountability of all actors.

**Potential modalities/indicators of application of the principles:**

- Establishing clear responsibilities for the implementation and monitoring of anti-corruption measures.
- Developing and implementing a system for regular monitoring of progress in the implementation of strategies, including reports on achieved results and challenges.
- Implementation of regular evaluations to assess the effectiveness of anti-corruption policies i revealed areas for improvement.
- Ensuring that all data on the implementation of anti-corruption measures are publicly available and subject to supervision,

including publication of reports and analyses.

- Developing and implementing procedures to address non-compliance or inadequate implementation of anti-corruption policies. These procedures may include: problem identification, providing support, introducing corrective measures (procedures, additional training, etc.), transparency and public reporting on default.

## PRINCIPLE OF CONTINUITY OF IMPLEMENTATION OF SYSTEM ACTIVITIES

*Description:* This principle emphasizes the importance of constant and long-term engagement in the fight against corruption. In order for anti-corruption initiatives to be sustainable and successful, it is necessary to continuously implement systemic activities and adapt approaches in accordance with changes in the environment. This ensures that the fight against corruption is not only effective, but also sustainable.

### **Potential modalities/indicators of application of the principles:**

- Revising and adapting strategies and action plans to respond to new challenges and changes in the legislative, legal and social environment.
- Ensuring constant resources and support for the implementation of anti-corruption activities.
- Ensuring institutional commitment to the long-term goals of the fight against corruption.
- Strengthening of institutional capacities.
- Ensuring that anti-corruption activities are a priority at all levels of government, etc.

## PRINCIPLE OF PROACTIVE TRANSPARENCY

*Description:* This principle implies that institutions publish relevant information in advance and voluntarily, making it easily accessible to the public without the need for formal requests. This ensures openness and accountability of institutions, enabling citizens and the media to see their work and preventing corruption through the availability of information on activities, decisions and spending of public funds.

### **Potential modalities/indicators of application of the principles:**

- All relevant information on anti-corruption initiatives, including budgets, progress reports, and key decisions, should be publicly available and regularly updated on the institutions' official websites.
- Institutions at all levels of government should regularly prepare reports on the implementation of anti-corruption measures and publish them in a manner accessible to the public, including details on results, challenges, and planned activities.
- Creation and maintenance of publicly available databases that contain information on the transparency of public procurement, contracts, and other relevant processes, allowing citizens and the media insight into the work of institutions.
- Enable the public to participate in decision-making through regular consultations, public hearings and mechanisms for proposals and feedback.
- Organization of educational campaigns and workshops for officials and citizens with the aim of raising awareness of the importance of proactive transparency and its role in the fight against corruption.

## PRINCIPLE OF EFFICIENCY

*Description:* This principle refers to achieving maximum results with optimal use of resources in the fight against corruption. Institutions should work so that anti-corruption efforts are efficient, timely

and profitable, and that resources are used in a way that brings the greatest possible benefit in preventing and suppressing corruption.

**Potential modalities/indicators of application of the principles:**

- Set clearly defined and measurable goals for each anti-corruption initiative, and regularly monitor their success and adjust the strategy as needed.
- Ensuring that financial, human and material resources are used in the most efficient way, including regular audits and evaluations of costs and benefits.
- Regularly monitor and evaluate the effect of anti-corruption measures, and transparently publish the results and use them to improve strategies.
- Improve inter-institutional cooperation to avoid duplication of activities and ensure efficient use of resources through joint initiatives and coordinated actions.
- Ensuring constant training and professional development of professional staff.
- Apply advanced technologies for automation and digitization of processes, in order to increase efficiency in detection, reporting and monitoring of corruption cases.

**THE PRINCIPLE OF NON-DISCRIMINATION AND RESPECT FOR CITIZENS' FREEDOMS AND RIGHTS**

*Description: This principle dictates that all anti-corruption measures and initiatives must be designed and implemented in a way that ensures equal treatment of all citizens, regardless of their personal characteristics, and that fundamental freedoms and rights guaranteed by laws and international standards are fully respected.*

**Potential modalities/indicators of application of the principles:**

- Ensuring that anti-corruption policies and practices are designed and implemented without any discrimination, and regularly reviewing procedures to ensure compliance with this principle.
- Establish mechanisms for legal protection of citizens who may be affected by discriminatory practices in anti-corruption proceedings, and enable quick and fair resolution of complaints.
- Organizing educational campaigns that will inform citizens about their rights and freedoms in the context of the fight against corruption, and the ways in which they can protect their rights.
- Ensuring equal access to information about anti-corruption initiatives for all citizens, regardless of their social or economic circumstances, including the translation of key documents into all official languages in BiH.
- Take into account the gender perspective of corruption, and the different impact and consequences that corruption can have on men and women in accordance with the Law on Gender Equality in BiH.

The aforementioned approaches ensure that the principles of the fight against corruption are not only declaratively present, but also practically integrated in all phases of strategic planning and implementation of anti-corruption documents at all levels of government in BiH, emphasizing the importance of participation, coordination, efficiency and transparency.

More intensive involvement and use of professional resources of APIK in all stages of development and monitoring of the implementation of anti-corruption policies in BiH ensures better compliance with general principles, contributes to the quality of documents and coordinated implementation and easier monitoring.

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## **STANDARDIZED STRATEGIC PROGRAMS AND ACTIVITIES FOR ALL LEVELS OF GOVERNMENT IN BIH**

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In the context of standardized strategic programs and activities for all levels of government in Bosnia and Herzegovina, it is crucial to understand how the general principles of state strategy shape and guide the development and implementation of anti-corruption policies in BiH.

The general principles of the state strategy serve as basic guidelines that ensure that all strategic programs and anti-corruption activities are aligned with universal standards and values. Any program or activity must reflect these principles to ensure consistency in the development of anti-corruption policies. For example, the principle of zero tolerance requires that all strategic documents clearly define and apply strict measures against corruption, while the principle of coordination implies coordination and cooperation between different levels of government as well as different sectors.

By applying general principles to standardized strategic programs and activities, Bosnia and Herzegovina can ensure that all anti-corruption measures are not only formally harmonized, but also practically effective. This connection between principles and activities enables the creation of a coherent and comprehensive framework for the fight against corruption, which is aligned with international standards and adapted to local needs.

Below is an overview of standardized strategic programs and activities that are applicable to all levels of government. These programs can be adopted, elaborated and adapted by all levels of government in BiH, with full respect for their capacities and ownership of the processes of creating strategic anti-corruption policies at the appropriate level of government.

### **STRATEGIC OBJECTIVE 1 TO STRENGTHEN THE SYSTEM OF PREVENTION AND COORDINATION MECHANISMS**

The system of prevention and coordination of the fight against corruption was set as the initial priority of the Strategy for the fight against corruption 2024-2028. and the accompanying Action Plan, in the context of which strategic programs and concrete implementation activities are further elaborated.

In this regard, effective prevention of corruption implies improving the legal framework, restoring trust in institutions and raising and strengthening public awareness by developing sensitivity to the harmful consequences of corruption, strengthening integrity and responsibility, and strengthening the resistance of the general public to participation in corrupt activities.

The most common weakness in the fight against corruption is reflected in the efforts to take action against the participants in corruption, after the corrupt activity has already been done and caused damage. Therefore, to this end, the emphasis was placed on strengthening cooperation and corruption prevention structures at all levels of government, including strengthening the normative and institutional framework for the fight against corruption, strengthening the integrity system, responsible management of public finances, and effective management of conflicts of interest. Also, the stated strategic goal includes activities related to the improvement of the conditions for the participation of the entire society, the establishment and improvement of digital anti-corruption tools, public anti-corruption campaigns and education.

### *Strategic program 1.1. Strengthening the capacity of institutions*

In the context of improving the normative framework, and with the aim of a more effective fight against corruption, this strategic program will ensure the launch of a series of initiatives for the adoption and amendment of laws that are relevant in the fight against corruption in BiH.

With the aim of improving the normative framework for effective prevention of corruption, it is necessary to develop and improve the legal framework for clear positioning of the Agency and bodies, and ensuring their complete operational, personnel and financial independence in the system of public institutions at the appropriate level of government. In these processes, it is necessary to emphasize both the fulfillment of international recommendations and standards relevant to specific areas, as well as ensuring the uniformity of the solutions contained in the anti-corruption legislation in BiH.

#### *Tabular overview of activities from the Strategic Program 1.1. Strengthening the capacity of institutions*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
1.1.3. Complete the legal framework related to the protection of persons who report corruption in BiH in accordance with the recommendations of the OECD from 2021 and the EU directive from 2019	<p>Initiator: APIK/TSK/competent ministries at all levels of government in BiH</p> <p>Conductors: Governments and parliaments in Bosnia and Herzegovina</p>	<ul style="list-style-type: none"> <li>- Analysis of existing legislation</li> <li>- Collection and analysis of recommendations</li> <li>- Drafting of amendments to the law</li> <li>- Public consultation</li> <li>- Preparation and adoption of laws</li> </ul>
1.1.4. Harmonize the normative framework for resolving conflicts of interest at all levels of government in BiH in accordance with GRECO recommendations, EU standards, the Opinion of the Venice Commission from 2021	<p>Initiators: Competent ministries of justice/competent institutions</p> <p>Conductors:</p>	<ul style="list-style-type: none"> <li>- Analysis of the existing normative framework</li> <li>- Collection and analysis of recommendations</li> <li>- Drafting of amendments to the law</li> </ul>

and recommendations from the II cycle of reports on the implementation of UNCAC for BiH	Legislative bodies at all levels of government in BiH	<ul style="list-style-type: none"> <li>- Public consultation</li> <li>- Preparation and adoption/harmonization of laws</li> </ul>
1.1.5. Define the legal framework in the field of lobbying in accordance with GRECO recommendations	<p>Initiators: APIK/ VTK</p> <p>Conductors: APIK, CSOs, chambers of commerce at all levels of government in Bosnia and Herzegovina</p>	<ul style="list-style-type: none"> <li>- Get involved in the working group for the development of the legal framework</li> <li>- Conduct a detailed analysis of existing legal regulations in the region;</li> <li>- Defining terms and scope of regulation</li> <li>- Preparation of the draft law</li> <li>- Establishment of lobbyist registry</li> <li>- Public consultation</li> </ul>
1.1.8. Normatively regulate the field of organization of political parties in Bosnia and Herzegovina	<p>The initiators</p> <p>Conductors: Competent institutions in Bosnia and Herzegovina</p>	<ul style="list-style-type: none"> <li>- Analysis of the existing normative framework</li> <li>- Collection and analysis of recommendations</li> <li>- Drafting of legal amendments</li> <li>- Public consultation</li> <li>- Preparation and adoption of laws</li> </ul>
1.1.9. Adopt at all levels of government the Law on transparency of media ownership and criteria for public advertising	<p>Initiators: RAK, Press Council, Ministry of Communications and Transport of BiH, competent ministries at the appropriate level of government</p> <p>Conductors: VM BiH and PS BiH, legislative bodies at all levels of government</p>	<ul style="list-style-type: none"> <li>- Analysis of normative solutions of the subject area in the region</li> <li>- Collection and analysis of recommendations</li> <li>- Drafting of amendments to the law</li> <li>- Public consultation</li> <li>- Preparation and adoption of laws</li> </ul>
1.1.10. Improve ethical codes and other internal regulations for police officers in BiH in accordance with GRECO recommendations	<p>The initiators</p> <p>Conductors: Police agencies in BiH</p>	<ul style="list-style-type: none"> <li>- Analysis of existing ethical codes and internal regulations</li> <li>- Analysis of GRECO recommendations</li> <li>- Drafting of amendments to ethical codes and internal regulations</li> <li>- Public consultation</li> </ul>

		<ul style="list-style-type: none"> <li>- Preparation and adoption of amendments to codes and regulations</li> </ul>
<p>1.1.12. Establish office(s) for asset recovery that will be in charge of supporting the finding, identification and confiscation of property acquired through criminal activity</p>	<p>The initiators Conductors: Competent Ministries of Justice / Competent Institutions in BiH</p>	<ul style="list-style-type: none"> <li>- Analysis of existing capacities and needs</li> <li>- Defining the structure and competence of the office</li> <li>- Elaboration of the legal and regulatory framework</li> <li>- Office establishment</li> <li>- Developing and implementing operational procedures</li> </ul>

Also, bearing in mind the EU Directive (EU) 2019/1937 of the European Parliament and the Council of October 23, 2019, dedicated to the protection of persons who report violations of the rights of the Union, BiH, on its EU integration path, is obliged to respect it and improve its legislation in this area. In this regard, and in accordance with Article 70 of the Stabilization and Association Agreement with the EU, domestic authorities are obliged to establish cooperation regarding the gradual harmonization of existing laws and future legislation with the EU acquis and, among other things, to cooperate on strengthening institutions and the rule of law, and in the fight against corruption. Also, the mentioned process is extremely important for BiH, which, as a country with a strategic commitment to EU membership, also in this important segment wants to ensure all the necessary systemic prerequisites for the transposition of the EU Directive into domestic legislation.

Integrity in the judiciary is also of particular importance. This is also recognized by the EU, which requests certain changes in several laws, especially the Law on the High Judicial and Prosecutorial Council and their implementation, in order to ensure the greatest possible integrity in all parts of the judiciary. This will lead to increased trust of citizens and the establishment of the judiciary as an independent and objective system in the service of all. Therefore, the ultimate goal of this strategic program is the systemic harmonization of anti-corruption legislation on the territory of BiH in accordance with EU standards and other relevant international obligations and recommendations.

In order to adequately understand what is expected of all actors in the process of harmonizing anti-corruption legislation in BiH with EU standards and international recommendations, it is important to review and analyze specific measures from the Strategic Program that are intended to achieve the defined goal.

### *Strategic program 1.2. Effective management of conflicts of interest*

Effective management of conflicts of interest represents an important segment in the prevention of corruption. Therefore, the adoption and application of the law on the prevention of conflicts of interest at all levels of government in BiH is an important preventive mechanism in the fight against corruption.

The existing legal framework in the area of conflict of interest prevention in BiH is currently regulated as follows:

- Parliamentary Assembly of BiH (hereinafter PS BiH) on 08.03.2024. adopted the new Law on Prevention of Conflict of Interest in Institutions at the level of BiH.<sup>1</sup> On the date of application of this law, the Law on Conflict of Interests in Government Institutions of Bosnia and Herzegovina ceases to be valid.<sup>2</sup>
- In the Republic of Srpska, since 2008, the Law on Prevention of Conflicts of Interest in the Authorities of the Republic of Srpska has been in force<sup>3</sup>, and in 2023, the Law on Amendments to the Law on Prevention of Conflicts of Interest was adopted by the authorities of the Republic of Srpska.<sup>4</sup>
- During 2008, it was adopted Law on conflict of interest in authorities in the Federation of Bosnia and Herzegovina<sup>5</sup>, but it has not been applied since 2013. Bearing in mind that in the Federation of Bosnia and Herzegovina the existing Law on Conflict of Interest has not been applied since 2013, some cantons in the Federation of Bosnia and Herzegovina have started passing their own laws to regulate this area. Thus, Sarajevo Canton normatively regulated the conflict of interest within the Law on Prevention and Suppression of Corruption in KS<sup>6</sup>, while in the form of a Draft, an identical legal solution was also initiated in the Unsko-san canton.
- On the territory of the Brčko District of BiH, the new Law on the Prevention of Conflict of Interest in the Institutions of the Brčko District of BiH has been in force since March 2021.<sup>7</sup>

Group of Countries Against Corruption (GRECO)<sup>8</sup>, in her reports, she recommended harmonizing the law on conflict of interest in the entire territory of Bosnia and Herzegovina and tightening the system of sanctions. In addition to harmonizing legal regulations, it is necessary to establish capacities for monitoring conflicts of interest at the levels of government in BiH, where they do not exist, and to strengthen capacities where bodies for monitoring conflicts of interests have already been established.

Among other things, GRECO recommends: "(i) consolidating the current requirements for the publication of financial data into a single application form, (ii) introducing the obligation to report assets of close relatives and submitting updated information in the event of a significant change in the data to be reported during the mandate, and (iii) ensuring that financial data is published and easily accessible, while respecting the privacy and security of parliamentary representatives and their close relatives, who are subject to reporting obligations." Furthermore, GRECO assessed "x. that the system for managing conflicts of interest of persons with the highest executive functions be reviewed and strengthened by (i) ensuring that declarations of interests of persons with the highest executive functions are subject to regular substantive checks, with proportionate sanctions in case of violations, including false reporting or non-reporting ; (ii) making decisions regarding conflicts of interest available to the public; and (iii) the introduction of ad hoc disclosure requirements regarding persons performing the highest executive functions in situations of conflicts of interest as they arise (paragraph 108).

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<sup>1</sup>Law on Prevention of Conflicts of Interest in Institutions at the BiH Level ("Official Gazette of BiH", No. 18/24)

<sup>2</sup>Law on conflict of interest in government institutions of Bosnia and Herzegovina ("Official Gazette of BiH", no. 13/02, 16/02, 14/03, 12/04, 63/08, 18/12, 87/13 and 41/16)

<sup>3</sup>Law on prevention of conflicts of interest in the authorities of the Republic of Srpska ("Official Gazette of the Republic of Srpska", no. 73/08)

<sup>4</sup>Law on Amendments to the Law on Prevention of Conflict of Interest in authorities of the Republic of Srpska ("Official Gazette of the Republic of Srpska", No. 90/23)

<sup>5</sup>Law on conflict of interest in authorities in the Federation of BiH ("Official Gazette of FBiH", number 70/08)

<sup>6</sup>of the Law on the Prevention and Suppression of Corruption in the KS ("Official Gazette of Sarajevo Canton", No. 35/22, 17/22-Correction and 52/22-Correction)

<sup>7</sup>Law on Prevention of Conflict of Interest in the Institutions of the Brčko District of BiH ("Official Gazette of the Brčko District of BiH", No. 4/21)

<sup>8</sup>Second Interim Report on the Compliance of BiH from the Fourth Round of GRECO Evaluation, p.4 <http://msb.gov.ba/dokumenti/strateski/default.aspx?id=23446&langTag=bs-BA>

In addition, they believe that it is necessary "to (i) consider the extension of the rest period for persons with the highest executive functions; (ii) to extend the post-employment rules in relation to persons in the highest executive positions to cover employment in the private sector".

In this sense, this strategic program foresees a number of measures and activities related to the improvement of legislative frameworks that regulate the area of conflicts of interest at all levels of government in BiH, with their necessary harmonization with the recommendations of GRECO, EU standards and other relevant international standards, and holding regular trainings in the mentioned field for appointed and elected officials and their advisors.

*Tabular overview of activities  
from the Strategic Program 1.2. Effective management of conflicts of interest*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
1.2.2. To establish the cooperation of all competent authorities in order to establish an efficient mechanism of control of property/financial forms	The initiators Conductors: Competent authorities for the enforcement of laws on conflict of interest and all institutions with public powers in BiH	<ul style="list-style-type: none"> <li>- Identification of key competent authorities</li> <li>- Development and harmonization of cooperation frameworks</li> <li>- Establishing mechanisms for information exchange</li> <li>- Training</li> </ul>
1.2.3. Create and improve functional software solutions of bodies for the implementation of laws on conflicts of interest in Bosnia and Herzegovina	The initiators Conductors: Competent bodies for enforcement of laws on conflict of interest in BiH	<ul style="list-style-type: none"> <li>- Analysis of needs and requirements</li> <li>- Development of software specifications</li> <li>- Development and testing of software solutions</li> <li>- User training</li> <li>- Implementation and integration</li> <li>- Monitoring and maintenance</li> <li>- Periodic promotion</li> </ul>
1.2.4. Publicly publish data from asset statements	The initiators Conductors: Competent bodies for enforcement of laws on conflict of interest in BiH	<ul style="list-style-type: none"> <li>- Data collection and verification</li> <li>- Development of a publishing platform</li> <li>- Ensuring transparency and accessibility</li> <li>- Customer support</li> </ul>
1.2.5. Make publicly available the register of received gifts	The initiators Conductors: Competent authorities for law enforcement on conflict of interest	<ul style="list-style-type: none"> <li>- Data collection and verification</li> <li>- Ensuring transparency and accessibility</li> </ul>
1.2.6. Develop methodology/guidelines for managing the conflict of interest of civil servants	Initiators: APIK/ADS at all levels of government in BiH  Performer: ADSs at all levels of government in BiH and all institutions in BiH	<ul style="list-style-type: none"> <li>- Current state analysis and data collection</li> <li>- Development of draft methodology/guidelines</li> <li>- Consultation and feedback</li> <li>- Finalization of methodology/guidelines</li> <li>- Implementation and training</li> </ul>

***Strategic program 1.3. Ethical business in the private sector***

Due to the significant role of the private sector in the fight against corruption, this strategic program will involve the private sector in anti-corruption efforts through the development of compliance systems and policies in the private sector, with the aim of reducing all types of corruption risks.

There are no significant recent studies in BiH that would indicate the level of corruption within the private sector.

In the Report of the United Nations Office on Drugs and Crime (UNODC)<sup>9</sup> from 2013, certain knowledge about corruption and its influence within the private sector was presented. Among other things, he notes that business representatives in BiH cite corruption as the sixth most significant obstacle to business, after high taxes, complicated tax laws, political instability, labor regulations and limited access to financing.

Through the analysis, it was further concluded that approximately two-thirds (65.2%) of the companies had at least one contact with a public official during the 12 months preceding the survey.

Likewise, it was pointed out that the rate of presence of bribery among companies that had contact with public officials in that period was 10.4%.

Corruption represents one of the most significant obstacles to smooth operations, and it destroys the business image of companies, which negatively affects the market, especially when it comes to attracting foreign investors and companies to invest in the economic development of BiH.

It is necessary to pay special attention to the promotion of good practices and the anti-corruption standard ISO 37001 (Antibribery Management System), which includes the analysis and assessment of the degree of bribery risk of the company depending on its size and structure. As a result of research on the level of satisfaction among foreign investors in Bosnia and Herzegovina, the Business Barometer is periodically published<sup>10</sup>, which contains data obtained by surveying members of the Council of Foreign Investors (VSI) in Bosnia and Herzegovina. The aforementioned surveys among the members of the VSI are conducted with the aim of obtaining a better insight into the state of the business environment in BiH, the obstacles faced by investors, as well as their plans for reinvestment, new employment and the creation of more business opportunities in BiH, and they also provide an overview of the risks that would have the greatest impact on their successful business in the future.

According to data from the latest Business Barometer published in August 2021, the main risks affecting investment are political instability (94%), followed immediately by corruption and crime (81%), and in third place is the lack of rule of law (64%). All of the above indicates that it is necessary to actively involve the private sector in the creation and implementation of anti-corruption policies in all business segments.

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<sup>9</sup>Report of the United Nations Office on Drugs and Crime "Business, Corruption and Crime in Bosnia and Herzegovina: The Impact of Bribery and Crime on Private Enterprises", 2013, available at [https://www.unodc.org/documents/data-and-analysis/statistics/corruption/Prevod\\_izvjestaja\\_BHS\\_fina\\_za\\_stampu\\_ispraveno.pdf](https://www.unodc.org/documents/data-and-analysis/statistics/corruption/Prevod_izvjestaja_BHS_fina_za_stampu_ispraveno.pdf)

<sup>10</sup> <https://fic.ba/en/business-barometer/>

*Tabular overview of activities from the Strategic Program 1.3. Ethical business in the private sector*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
1.3.1. Implement business sector training on integrity, including codes of business ethics	The initiators Conductors: VTK BiH, chambers of commerce at all levels of government in BiH, APIK, TSK	- Analysis of needs and development of training content - Organization and realization of trainings
1.3.2. Develop compliance systems and policies (Compliance program) in the private sector (legal risks, sanctions risks and reputational risks)	The initiators Conductors: VTK BiH, chambers of commerce at all levels of government in BiH, APIK, TSK	- Analysis of the current situation and identification of needs - Development of compliance policies and procedures - Compliance system implementation
1.3.3. Conduct training on the implementation of BAS ISO 37001:2019-Management system for the prevention of bribery and BAS ISO 37301:2023-Compliance management system and support for the introduction of standards and BAS ISO 37000:2021 - Management of organizations	Conductors: VTK BiH, chambers of commerce at all levels of government in BiH	- Assessment of training needs - Implementation of training

***Strategic program 1.4. Responsible management of public finances***

Public finances are a particularly vulnerable and challenging area for all emerging forms of corruption. Therefore, responsible management of public finances can be considered one of the most important anti-corruption policies. Responsible management of public finances is reflected in persistent and consistent measurement of the effectiveness and efficiency of public administration and putting it at the service of citizens. The system of reforms in the field of public finance and better functionality of public administration can be achieved by taking over the acquis of the EU, developing partnership relations with civil society organizations, digitizing and strengthening the statistical basis, which, among other things, better conceives development and other policies in BiH, as well as higher absorption of EU funds.

Practically, today the public administration financing system in BiH is burdened with problems related to the consistent application and implementation of adopted rules and standards related

to financial management and control, including an inadequate approach to managing work processes.

Financial management and control (FMC) integrates numerous areas, such as: human resource management, ethical issues, organization, public procurement, relations between related institutions, etc., which are regulated in more detail by other laws and by-laws, instructions, guidelines and the like. So the regulation governing financial management and control is far more extensive than the Law on Financing of BiH Institutions<sup>11</sup>, as a basic regulation for financial management and control. The head of the institution is responsible for establishing a functional system of financial management and control.<sup>12</sup>

Adequate legal regulation of the area of public procurement, which carries huge risks for public finances, is of particular importance in public finances. It is common knowledge that states lose the most budget funds in that area, which is why it is necessary to ensure effective legal regulation of this area, including the implementation of newly adopted legal norms in a way that will minimize the possibility of loss through the public procurement system.

The new strategic framework for public procurement for the period 2024-2028 was adopted in the middle of March 2024, and assumes that the public procurement system in BiH is modern, transparent, competitive and efficient, as well as harmonized with the EU legal order. From the aspect of anti-corruption policies, this strategy introduces measures to strengthen integrity and the fight against corruption, and generally ensures a preventive approach.

Financial control rules protect the financial interests of the EU from fraud in the management of EU funds. In Bosnia and Herzegovina, there is evident room for progress for harmonization with the Directive on combating fraud committed against the financial interests of the EU by means of criminal law.

In this sense, BiH should establish a coordination service for combating fraud (AFCOS) in order to facilitate efficient cooperation and exchange of information with the EC. Promotion and implementation of gender aspects in budget planning and execution (gender responsible budget) will ensure equal and transparent management of public finances (gender responsible budgeting).

When planning activities and creating situation analyses, it is necessary for each budget user to perform an analysis in order to assess the impact of existing budget funds on meeting the different needs of women and men.

*Tabular overview of activities from  
of the strategic program 1.4. Responsible management of public finances*

Activity	Competent The body	Operational recommendations for implementation
1.4.1. Carry out financial management and control (FUK) in a systemic way	The initiators Conductors:	- Implementation and training

<sup>11</sup>Law on Financing of BiH Institutions ("Official Gazette of BiH", number 61/04, 49/09, 42/12, 87/12, 32/13 and 38/22)

<sup>12</sup> Guidelines for the development of managerial responsibility in BiH institutions, available at <https://chj.mft.gov.ba/Content/OpenAttachment?id=015e9e1b-5afe-42e8-9b2e-b94a353d64c5&lang=hr>

	<p>All institutions of the public sector in Bosnia and Herzegovina</p> <p>CHJ MFT BiH Office for the Audit of BiH Institutions</p>	<ul style="list-style-type: none"> <li>- Monitoring and supervision</li> <li>- Reporting</li> </ul>
1.4.2. Identify and assess the degree of corruption risk in key business processes that are most susceptible to corruption through public procurement and employment processes	<p>The initiators Conductors: All public sector institutions in BiH</p> <p>CHJ MFT BIH</p>	<ul style="list-style-type: none"> <li>- Form a working group for risk analysis</li> <li>- Determine methodology for assessment</li> <li>- Identification of key business processes</li> <li>- Risk assessment</li> <li>- Development and implementation of control measures</li> </ul>
1.4.3. To develop the awareness of heads of institutions public sector on responsibility and role managers in the process of making business decisions ensuring legal spending available means for the realization of goals institutions	<p>The initiators Conductors: All public sector institutions in BiH</p>	<ul style="list-style-type: none"> <li>- Development of training programs</li> <li>- Organization of training</li> <li>- Implementation and support</li> </ul>
1.4.6. Make allocation information available budget funds on the amount and purpose funds allocated to civil organizations societies and associations	<p>Initiator: APIK/TSK</p> <p>Conductors: Institutions that allocate financial resources in Bosnia and Herzegovina</p>	<ul style="list-style-type: none"> <li>- Development and implementation of a platform for publishing data</li> <li>- Publication of data and periodic updating</li> </ul>
1.4.7. Make allocation information available budget funds on the amount and purpose funds allocated to business entities	<p>Initiator: APIK/TSK</p> <p>Conductors: Institutions that allocate financial resources in Bosnia and Herzegovina</p>	<ul style="list-style-type: none"> <li>- Analysis of the situation and definition of the framework for transparency</li> <li>- Publication of data and periodic updates</li> </ul>

*Strategic program 1.5. Participation of society*

Access to information and increasing transparency are the basic principles of open government, the implementation of which strengthens citizens' trust in its work. Public administration services have value if they are delivered on time, in an efficient manner and so that they are visible, clear and easily accessible to all users.

Societies founded on respect for general social values: freedom, equality, solidarity, tolerance, respect for human rights and shared responsibility have self-sustaining economic development. The approach to the fight against corruption must include several levels: personal, institutional, social and state. Every citizen has rights and obligations arising from the law and international legal norms, and part of those rights are also regulated by Article 13 of the UNCAC.<sup>13</sup> Institutions in BiH should continue to implement the Standard of Proactive Transparency within the Law on Freedom of Access to Information at the level of BiH institutions, in order to enable citizens, civil society organizations, the academic community and the media to be involved in the fight against corruption and to cooperate with them.

**Gender-specific manifestations of corruption-** In the implementation of the planned activities, care should be taken to raise awareness and knowledge about gender-specific manifestations of corruption. Corruption threatens the basic values of a democratic society, the rule of law and respect for human rights, and one of the key pillars on which a democratic society rests is gender equality. It is necessary to affirm the importance of including the principle of gender equality and gender perspectives in activities aimed at preventing and fighting corruption.

**Digitization** -An analysis of the state of digital tools for anti-corruption activities in BiH found that there are no uniform applications used by bodies to prevent corruption. However, in terms of digitization of anti-corruption and the development of IT tools, KS stands out as an example of good practice thanks to the AnticorruptiKS platform, a multimodal analytical software. This platform enables the management of databases (registries), the automation of the reporting and search process according to given parameters, and the mutual communication of databases. Following the example of KS in the development of IT tools, certain levels of government in BiH (BD BiH, TK, ZDK, SBK, USK, BPK) have, in accordance with their own competencies and needs, established certain types of registers. These registers aim to facilitate the supervision of the implementation of regulations aimed at preventing anti-corruption activities.

Currently, the uneven method of data collection and insufficient transparency of that data does not contribute to a unified overall picture of the level of corruption and management of corruption risks in BiH. The goal is to create unified program modules that would unify the activities of the body for the prevention of corruption in an analytical and structural sense. In the coming period, it is necessary to standardize data that would be applicable at all levels of government, both due to the very stage of development of corruption prevention, and due to the incomplete formation of professional structures in charge of corruption prevention and conflict of interest offices. The primary activities of this strategic program are the establishment of registers of elected officials, holders of executive duties, advisers, civil servants and employees in BiH government institutions, the register of declarations of property status and interests, and the establishment and maintenance of digital tools for the preparation of analyzes and statistical data on all forms of corrupt behavior as and online tools of anti-corruption bodies

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<sup>13</sup>United Nations Convention against Corruption - United Nations Convention against Corruption (UNCAC), adopted on 31.10.2003. year by the UN General Assembly, <https://www.unodc.org/unodc/en/corruption/uncac.html>

and the Agency, and the establishment of a Central Data Portal, which would speed up many activities, simplify the fight against corruption and raise citizens' awareness.

**Transparency-** Pursuant to Article 10 of the UNCAC, the necessary measures must be taken to increase their transparency, which includes enabling the general public to see the organization, functioning and decision-making procedures, simplifying access procedures to decision-making bodies, and publishing information. The principles of Article 10 of the UNCAC are based on the principles of proactive transparency, which implies the practice of public institutions to make available information of public importance that is in their possession. The primary activities within this strategic program are the consistent implementation of the Law on Freedom of Access information with a special focus on the delivery of requested information and application of proactive transparency standards, harmonization of regulations with international standards and regulations in BiH, unification of websites of public institutions, establishment of the Central Data Portal, increase in transparency on donations to political parties, improvement of transparency in the allocation and spending of public funds, and the public publication of the intended registers in order to make information available to various interested publics.

**Integrity-** Social values based on integrity are of crucial importance for the defense of civil liberties and ensuring accountability. Public campaigns are a special form of communication with different publics that aim to influence the change of attitudes of targeted categories of the public and mobilize public support in anti-corruption efforts. Successful implementation of strengthening public awareness of the harmfulness of corruption and changing mental patterns implies the preparation and implementation of anti-corruption campaigns aimed at various interested publics.

*Tabular overview of activities  
from the Strategic Program 1.5. Participation of society*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
1.5.2. Publish funding information media from public funds	<p>Initiators: APIK and TSK</p> <p>Conductors: RAK and the media in BiH and the institutions in BiH that finance them</p>	<ul style="list-style-type: none"> <li>- Develop and publish criteria for media funding (collect data/create guidelines/publish criteria)</li> <li>- Ensure public availability of information on the use of funds (Prepare data/Post information on websites/Update regularly)</li> <li>- Increase visibility of media funding reports (Create/Publish/Promote reports)</li> </ul>
1.5.3. Develop, apply and integrate specific digital anti-corruption tools	<p>The initiators</p> <p>Conductors: APIK/TSK</p>	<ul style="list-style-type: none"> <li>- Needs analysis/ Application development/ Testing/ Training/ Implementation</li> </ul>

1.5.4. Conduct anti-corruption campaigns and projects	The initiators Conductors: APIK/TSK, CSO	<ul style="list-style-type: none"> <li>- Campaign planning (target group, define goals and partners)</li> <li>- Development and implementation of campaigns (defining content and communication channels, implementing the campaign)</li> <li>- Prepare reports on progress and results achieved, and share them with interested parties and the public.</li> </ul>
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### *Strategic program 1.6. Anti-corruption education*

Education plays a fundamental role in the prevention of corruption. The role of education in the prevention of corruption refers to a change in mentality. In terms of changing the mentality, we understand success so that individuals do not want to use corrupt shortcuts that imply violation and non-compliance with legal norms in order to achieve success. The task of education is to create an attitude of intolerance towards corruption. In accordance with Article 13 of the UNCAC Convention, the focus of education is on the prevention of the activity itself. Therefore, anti-corruption education should influence the understanding of corrupt activities and create an attitude of intolerance towards corruption.

This Strategic Program, in accordance with GRECO<sup>14</sup> recommendations ii and ix, envisages the development and implementation of general and specific educational programs that include: representatives of legislative bodies, persons with the highest executive functions, representatives of institutions in BiH, representatives of bodies for the prevention of corruption, judges and prosecutors<sup>15</sup>, representatives of the private sector, public officials, children and young people, and other different categories of target public.

The declaration adopted at the special session of the General Assembly against corruption in July 2021 places anti-corruption education at the core of a comprehensive and multidisciplinary approach to promote transparency, accountability, integrity and a culture of rejecting corruption as a basis for preventing and fighting corruption.

It is planned to take steps to launch the GRACE initiative (UNODC Global Resource for Anti-Corruption Education and Youth Empowerment) in BiH to strengthen the role of youth and education in preventing and combating corruption and building a culture of intolerance to corruption through formal and informal educational programs aimed at building anti-corruption values, knowledge and skills. The GRACE initiative implies involvement and consultation with educators, international organizations, civil society organizations, but it is

<sup>14</sup> GRECO recommended further clarification of internal mechanisms to promote and enforce a code of conduct for parliamentary representatives, thereby protecting integrity within legislation, including (i) harmonized guidance, counseling and training relating to ethical and integrity-related provisions and the prevention of corruption, as and (ii) developing effective monitoring and enforcement mechanisms for those key issues; GRECO recommended significantly strengthening and further developing confidential counseling and dedicated practical training on ethics and integrity issues for judges and prosecutors [GRECO \(coe.int\)](https://www.greco-int.org/en/recommendations/2023/1zvje%20C5%20A1taj%20o%20Bosni%20i%20Hercegovini%20za%202023.%20-%20BHS%20prijevod%20%28002%29.pdf)

<sup>15</sup> <https://www.eas.europa.eu/sites/default/files/documents/2023/1zvje%20C5%20A1taj%20o%20Bosni%20i%20Hercegovini%20za%202023.%20-%20BHS%20prijevod%20%28002%29.pdf>

primarily aimed at children and young people through various campaigns, forums, dialogues, trainings, strengthening the institutional capacities of educational institutions, improving the informal sector of education in the field of anti-corruption, and spreading educational materials which are support in education.

By increasing the knowledge and awareness of corruption among all the public interested in its prevention, its causes, modalities and harmful effects, the chances of reducing corruption in society and increasing the number of interested public in the fight against corruption increase.

*Tabular overview of activities from the Strategic Program 1.6. Anti-corruption education*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
1.6.1. Conduct anti-corruption training for appointed and elected officials and their advisers	The initiators Conductors: APIK and TSK	<ul style="list-style-type: none"> <li>- Development of themes and content/ assurance of support</li> <li>- Organization of trainings (logistics/invitation to target groups/implementation)</li> <li>- Training reports (number of held trainings/participants)</li> </ul>
1.6.2. Conduct anti-corruption education for employees in the public sector	The initiators Conductors: APIK and TSK	<ul style="list-style-type: none"> <li>- Planning and preparation (needs analysis, goal setting, resource planning)</li> <li>- Development of the concept of education</li> <li>- Organization of trainings (logistics/invitation to target groups/implementation)</li> <li>- Training reports (number of held trainings/participants)</li> </ul>
1.6.3. Conduct integrity and anti-corruption education for children and youth (kindergartens, primary and secondary schools and colleges)	The initiators Conductors: APIK and ministries of education at all levels of government in BiH	<ul style="list-style-type: none"> <li>- Planning and preparation</li> <li>- Education programs introduced</li> <li>- Realized education programs</li> </ul>
1.6.5. Implement educational projects in accordance with the goals of the GRACE initiative aimed at building anti-corruption values among children and young people	The initiators Conductors: APIK Competent ministries of education at all levels of government in	<ul style="list-style-type: none"> <li>- Planning and preparation</li> <li>- Developing content and methods</li> <li>- Implementation</li> </ul>

## **STRATEGIC OBJECTIVE 2 STRENGTHENING MECHANISMS FOR DETECTING AND PROVING CORRUPTIVE CRIMINAL OFFENSES AND PROCESSING PERPETRATORS**

This strategic goal derives from the provisions of the criminal and criminal procedural laws valid in the territory of BiH, respecting its constitutional and legal structure. Therefore, the intention of this strategic goal is to provide all necessary assumptions and conditions in a repressive context with the aim of timely, efficient and legal detection and proof of corrupt criminal acts and prosecution of perpetrators. Also, it is undeniable that corruption nowadays takes place in all areas of social, economic and political activity. No area is immune to this negative phenomenon, which requires adequate professional training and specialization of the competent entities. Preventive action primarily refers to the elimination or reduction of causal factors, which directly or indirectly lead to the emergence of various phenomenological forms of corrupt criminal acts.

### ***Strategic program 2.1. Strengthening the capacity of judicial, police and other bodies to detect, prove and prosecute corrupt crimes***

Strengthening the capacity of law enforcement agencies and judicial institutions creates the necessary prerequisites for an effective fight against all forms of corruption.

By prosecuting perpetrators, prerequisites are created for strengthening the entire legal system through the protection of society from the commission of criminal acts by a preventive influence on others to respect the legal system and not commit criminal acts, to the point that citizens are sent the message that "crime does not pay". In addition to the repressive component, comprehensive preventive action is taken both on the perpetrator himself and on potential perpetrators, and restores public confidence in the legal system.

The detection and proof of these criminal acts is, by its nature, phenomenological forms of manifestation, method of execution and other specifics, extremely complex and demanding in terms of meeting restrictive legal conditions and standards of proof.

The complexity of detecting and proving these criminal acts and the prevalence of corruption require special engagement and improvement from all levels of government in order to consistently and effectively fight corruption, especially bearing in mind that most corrupt activities take place without witnesses, which makes gathering evidence much more difficult. Therefore, it is very important that, in addition to strengthening the personnel and material-technical capacities of the police and other anti-corruption bodies, they continuously

conduct training in the field of detecting and proving corrupt acts with a special emphasis on the application of special investigative actions, improve procedures for audit reports and the reporting system for effective monitoring of performance in investigations of corrupt crimes.

*Tabular overview of activities from  
of the strategic program 2.1. Strengthening the capacity of judicial, police and other bodies  
to detect, prove and prosecute corrupt crimes*

Activity	Competent The body	Operational recommendations for implementation
2.1.1. Strengthen personnel capacities through optimization of existing personnel, admission of new personnel and adoption of adequate regulations	Initiators: Judicial, police and other bodies in Bosnia and Herzegovina  Conductors: VM BiH/Governments and parliaments in BiH	<ul style="list-style-type: none"> <li>- Overview of personnel resources (status of personnel resources, needs)</li> <li>- Number of filled positions</li> <li>- Number of enacted, amended and supplemented regulations</li> </ul>
2.1.2. Conduct training in the field of detection and proof of corrupt criminal acts with an emphasis on the application of special investigative actions, as well as training in the detection and proof of serious violations of official duty in connection with corrupt acts	The initiators Conductors: Judicial, police and other bodies in Bosnia and Herzegovina	<ul style="list-style-type: none"> <li>- Planning and preparation</li> <li>- Developing content</li> <li>- Implementation</li> </ul>
2.1.3. To improve procedures according to audit reports	The initiators Conductors: Judicial, police, audit and other competent bodies in Bosnia and Herzegovina	<ul style="list-style-type: none"> <li>- Analysis of the current situation (assessment of existing processes, identification of challenges and obstacles related to the implementation of recommendations from audit reports)</li> <li>- Development/improvement and implementation of procedures</li> </ul>
2.1.4. Improve the material and technical conditions of the units for the investigation of corrupt criminal offenses and the units for professional standards	Initiators: Judicial, police and other bodies in Bosnia and Herzegovina  Conductors: VM BiH/Governments and	<ul style="list-style-type: none"> <li>- Needs assessment</li> <li>- Development of procurement plan</li> <li>- Procurement of equipment according to needs</li> <li>- Training and integration</li> <li>- Maintenance</li> </ul>

	parliaments in BiH	
2.1.5. Improve the reporting system for effective performance monitoring in investigations of corrupt criminal offenses from the receipt of a criminal report to the end of criminal proceedings and serious violations of official duties related to corrupt acts	The initiators Conductors: Police, judicial and other institutions in Bosnia and Herzegovina	- Development/improvement of the reporting system - More comprehensive reporting according to defined parameters
2.1.6. Analyze court verdicts in corruption cases	The initiators Conductors: Police, judicial and other institutions in BiH, CSOs	- Analysis planning (defining goals and criteria for selecting judgments) - Collection and selection of judgments - Analyzing judgments - Preparation of reports and analysis - Announcement

### *Strategic program 2.2. Cooperation in investigations of corruption crimes*

Bearing in mind that the complexity of detecting and proving corrupt criminal acts and the prevalence of corruption requires a comprehensive response from all levels of government, it is necessary to improve the operational cooperation of all relevant actors in the plan of a consistent and effective fight against corruption. This implies improving the exchange of information and data, timely reporting, and improving operational cooperation through the formation of joint investigative teams to work on more complex cases.

#### *Tabular overview of activities from of the strategic program 2.2. Cooperation in investigations of corruption crimes*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
2.2.1. Improve the exchange of information between police, tax, judicial and other institutions in Bosnia and Herzegovina	The initiators Conductors: Police, prosecutorial, judicial, tax and other institutions at all levels of government in BiH	- Assessment of the current state/methods and protocols for information exchange - Improvement of information exchange protocols and procedures that include security,

		accuracy and timeliness of information.
2.2.2. Improve the operational cooperation of police agencies with prosecutor's offices and other institutions	The initiators Conductors: Police, judicial, tax and other institutions at all levels of government in BiH	- Formation of joint teams with clear tasks, responsibilities and effective communication channels - Organization of regular working meetings - Planning and execution of operational actions - Preparation of reports on actions and results of joint actions

***Strategic program 2.3. Financial investigations, confiscation and management of confiscated assets***

Financial investigations, as an effective tool in the fight against corruption, are carried out with the aim of discovering, determining and confiscating illegally acquired property committed by a criminal act. Therefore, it is very important to educate state, police, tax officials, as well as officials and holders of judicial functions in the implementation of financial investigations, as well as improve the regulations that will regulate the conditions for their implementation.

The imperative within the procedures for confiscation of illegally acquired property benefits is the preservation of the temporarily or permanently confiscated value property with the obligation to respect the principle of "attention of a good host". By confiscating illegally acquired property and its social reuse in the community, it strengthens the culture of legality, justice and equality, helps to build the community's and society's resilience to corruption, and citizens' confidence in the justice system and government is improved.

In order to realize the above, it is necessary to emphasize the improvement of the management mechanisms of confiscated property.

*Tabular overview of activities from  
Strategic program 2.3. Financial investigations, confiscation and management of confiscated assets*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
2.3.1. Improve financial investigations	The initiators Conductors: Police, judicial, tax and other institutions at all levels of	- Development of effective strategies and procedures (definition of goals, development of an implementation plan) - Specialized training

	government in Bosnia and Herzegovina, agencies for the management of confiscated property	<ul style="list-style-type: none"> <li>- Increasing resources and capacity</li> <li>- Coordination and cooperation (forming teams, cooperation with other institutions)</li> </ul>
2.3.2. Educate state, police, tax officials, as well as officials and holders of judicial functions	<p>Initiators: Police, judicial, tax and other institutions at all levels of government in Bosnia and Herzegovina, agencies for the management of confiscated property</p> <p>Conductors: CEST FBiH, CEST RS, agencies for the management of confiscated property</p>	<ul style="list-style-type: none"> <li>- Planning and preparation (goals, topics)</li> <li>- Development of educational materials and programs</li> <li>- Conducting education</li> <li>- Reporting (number of held trainings, participants)</li> </ul>
2.3.3. Improve regulations that will regulate all aspects of conducting financial investigations	<p>Initiators: Police, judicial, tax and other institutions at all levels of government in Bosnia and Herzegovina, agencies for the management of confiscated property</p> <p>Conductors: VM BiH, governments and parliaments at all levels of government in BiH</p>	<ul style="list-style-type: none"> <li>- Analysis of existing legislation (identification of shortcomings)</li> <li>- Consultations with experts</li> <li>- Development and drafting of new regulations</li> <li>- Preparation and implementation of the adoption procedure</li> <li>- Adoption and implementation</li> </ul>
2.3.4. Improve the mechanism of management of confiscated property	<p>The initiators Conductors: Agencies for the management of confiscated property and other competent institutions</p>	<ul style="list-style-type: none"> <li>- Analysis of the existing system (normative framework, assessment of existing databases)</li> <li>- Development and improvement of the normative framework</li> </ul>

		<ul style="list-style-type: none"> <li>- Establishment and improvement of existing databases</li> <li>- Management and redistribution of confiscated property</li> <li>- Reporting and transparency</li> </ul>
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### **STRATEGIC OBJECTIVE 3 STRENGTHENING OF INTER-INSTITUTIONAL, REGIONAL AND INTERNATIONAL COOPERATION**

By signing conventions in the field of anti-corruption, Bosnia and Herzegovina committed to international cooperation in every aspect of the fight against corruption, including prevention, investigation, prosecution of perpetrators, as well as freezing, seizure and confiscation of property benefits obtained through acts of corruption.

International recommendations in the domain of anti-corruption are of great importance for BiH, especially for the reason that their implementation helps in the fight against corruption, but also in building the country's reputation at the international level. Many international organizations, financial institutions and donors set conditions related to the fight against corruption when providing financial support or development assistance. Implementation of anti-corruption recommendations can open the door for additional funding and support. Also, these recommendations often emphasize strengthening the rule of law, which is a key element in the fight against corruption. Their implementation can lead to the improvement of the legal system, more efficient judiciary and strengthening of institutions that fight against corruption at all levels of government.

#### ***Strategic program 3.1. Coordination and cooperation of institutional capacities to prevent corruption***

Inter-institutional cooperation and coordination are key elements of an effective strategy for the fight against corruption. Focusing on strengthening cooperation between various institutions and bodies in Bosnia and Herzegovina, this strategic program aims to combat corruption through the establishment of mechanisms and platforms for information exchange, coordination of activities and joint action. The current level of coordination in the fight against corruption has been characterized by limited scope both in terms of undertaking joint systemic activities and in terms of the establishment of institutional capacities responsible for the prevention of corruption in BiH.

A partial result was achieved in the coordinated strategic planning of anti-corruption policies in Bosnia and Herzegovina and the development of key elements of corruption prevention, such as establishment of a system of integrity plans. The initially established system of regular

coordination meetings between the Agency and the bodies for the prevention of corruption in BiH, after a certain period of rest, at the end of 2023, was returned to the focus of the anti-corruption coordination system, and a more active continuation of development and cooperation through this mechanism is expected in the future period.

The main goal of the anti-corruption coordination mechanism is to ensure an appropriate distribution of obligations and responsibilities for effective prevention of corruption, while respecting the legal competences of the Agency and the entire system for the prevention of corruption. Basically, the coordination and cooperation mechanism has the purpose of ensuring the coherent action of all participants in the prevention, and in the following stages, in the detection and prosecution of corruption.

One of the measures in fulfilling the key priorities for the opening of negotiations on joining the European Union envisages "ensuring the effective functioning and coordination of anti-corruption bodies". By establishing an effective coordination system, multiple effects will be achieved in the fight against corruption, mutual action and cooperation of all participants will be improved, and better results will be achieved in the implementation of strategic anti-corruption documents, thus contributing to the fulfillment of key priorities in the fight against corruption on BiH's path to the EU. In this regard, within this strategic goal, a series of systemic activities aimed primarily at completing the establishment of the corruption prevention system in BiH is foreseen. This primarily refers to the continuation of the professionalization of bodies for the prevention of corruption in BiH, where this process has not been completed, and the strengthening of communication and cooperation in the system of public institutions, especially between those with anti-corruption responsibilities.

The strengthening of communication and cooperation would be reflected first of all in the conclusion of memorandums of understanding and cooperation, which would define the forms and forms of cooperation, as well as the ways of exchanging information with the establishment of an information and telecommunications network. The aforementioned platform would ensure the dynamism of the previously mentioned processes within the coordination of the fight against corruption. Also, this strategic program includes the monitoring, implementation and evaluation of strategic anti-corruption documents in BiH, as well as the implementation of activities foreseen in individual anti-corruption projects and activities as part of the integration processes of BiH in the EU.

*Tabular overview of activities from  
of the strategic program 3.1. Coordination and cooperation of institutional capacities for  
prevention of corruption*

Activity	Competent The body	Operational recommendations for implementation
3.1.1. Complete the process of establishment and operationalization of professional bodies for the prevention of corruption in Bosnia and Herzegovina	Initiator: APIK  Conductors: Governments at all levels of government in Bosnia and Herzegovina	- Development of a legal framework that will regulate the positioning and competences of the TSK  - Provision of material, technical and personnel resources

		- Operationalization of TSK
3.1.2. Establish institutional cooperation between competent institutions with the aim of effectively preventing corruption	Initiators: APIK and TSK Conductors: Institutions with anti-corruption responsibilities	- Identification of relevant institutions and assessment of their needs - Defining forms of cooperation and communication - Establishment of formal agreements (MoU)
3.1.5. Standardize procedures for information exchange, reporting and cooperation between bodies for the prevention of corruption in BiH and contact points in institutions	Initiator: Agency Conductors: Bodies for the prevention of corruption in Bosnia and Herzegovina	- Analysis of the situation and identification of needs - Development of guidelines - Distribution and implementation of guidelines
3.1.6. Form a joint team of educators	Initiators and implementers: Agency and bodies for the prevention of corruption in Bosnia and Herzegovina	- Selection of team members (experience, professional qualifications) - Development and standardization of educational materials - Organization and implementation of trainings (training plan, target groups, format, locations)
3.1.7. Analyze experiences and challenges in the implementation of strategic anti-corruption documents in Bosnia and Herzegovina and, based on good practices, create uniform strategic planning standards	Initiators and implementers: Agency and bodies for the prevention of corruption in Bosnia and Herzegovina	- Analysis - Development of standards for uniform strategic planning in the field of fighting corruption (methodology, roles and responsibilities of key actors, ways of reporting and monitoring progress, compliance with international standards and recommendations)

***Strategic program 3.3. International cooperation in investigations of corruption crimes***

In the context of international cooperation in the field of investigation of corrupt criminal acts, it is very important to improve, first of all, the exchange of data on investigations that have an

international and regional character. In this sense, it is necessary to further strengthen communication and cooperation through defined communication channels of INTERPOL, EUROPOL, SELEC, EGMONT, CARIN, BAMIN, GlobE network, EUROJUST, European Public Prosecutor (EPPO), and other international organizations.

Certainly, contextually, this measure is supported by participation in operational actions of an international and regional nature, where these forms of international and regional cooperation, in addition to greater efficiency in detecting corruption, strengthen the international reputation of the system of public institutions in BiH responsible for detecting and prosecuting corruption. It is necessary to continue the trends of exchange of best experiences and practices, so that in the context of international and regional cooperation, the most effective standards of conduct are applied in detecting and proving such complex criminal acts as corrupt criminal acts.

*Tabular overview of activities  
from the Strategic Program 3.3. International cooperation in investigations of corruption crimes*

<b>Activity</b>	<b>Competent The body</b>	<b>Operational recommendations for implementation</b>
3.3.1. Improve data exchange with INTERPOL, EUROPOL and SELEC, EGMONT, CARIN, BAMIN, GLOBE, EUROJUST, European Public Prosecutor (EPPO) and other international organizations	The initiators Conductors: Police and other institutions in BiH	<ul style="list-style-type: none"> <li>- Create a list of all relevant international organizations with which it is necessary to improve data exchange</li> <li>- Analysis of existing channels and procedures for data exchange</li> <li>- Improve data exchange protocols respecting international standards and recommendations</li> </ul>
3.3.2. Participate in operational actions of INTERPOL, EUROPOL and SELEC, EUROJUST, European Public Prosecutor (EPPO) and competent institutions of other countries	The initiators Conductors: Police and other institutions in BiH	<ul style="list-style-type: none"> <li>- Form joint investigative teams</li> <li>- Active participation in the implementation of operational actions</li> <li>- Reporting on the implementation of actions and activities of joint investigative teams</li> </ul>
3.3.3. Exchange experiences and practices with international partner organizations and agencies	The initiators Conductors: Police and other institutions in BiH	<ul style="list-style-type: none"> <li>- Identification of key partners</li> <li>- Setting clear goals for sharing experiences</li> <li>- Organization and implementation of joint trainings and workshops</li> </ul>

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## **The role of the corruption prevention system in strategic planning and monitoring the implementation of anti-corruption policies in Bosnia and Herzegovina**

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In Bosnia and Herzegovina, the key segment in the fight against corruption is an effective prevention system, which is based, among other things, on strategic planning and consistent monitoring of the implementation of anti-corruption policies. In this context, the Agency for Prevention of Corruption and Coordination of the Fight Against Corruption plays a central role as a coordinator responsible for responsible monitoring of the implementation of the State Strategy for the Fight against Corruption. Given that the corruption prevention system in BiH is decentralized in the normative, institutional and strategic segments, below are presented the roles of key actors in terms of strategic planning and monitoring of the implementation of anti-corruption policies in BiH.

### ***The role of the Agency and bodies for the prevention of corruption in Bosnia and Herzegovina***

When it comes to the area of strategic planning and monitoring the implementation of anti-corruption policies in BiH, the role of the Agency is clearly defined through the following provisions of the Law on the Agency:

- The agency is responsible for:
  - Preparation of the Strategy for the fight against corruption, and preparation of the Action Plan for the prevention of corruption (Article 10, point a)).
  - The Agency is responsible for coordinating and supervising the implementation of the Strategy and Action Plan, as well as giving opinions and instructions on the issue of their implementation (Article 10, point b)).
  - Coordination of the work of institutions with public authorities in the fight against corruption (Article 10 point i)).
  - Informing competent institutions and the public about obligations based on international legal acts, and giving recommendations for their implementation in connection with the prevention of corruption (Article 10. Point p)).
- Entities, cantons and Brčko District of Bosnia and Herzegovina will adopt and develop a strategy for the fight against corruption and an action plan in accordance with the

general principles established in the State Strategy for the fight against corruption (Article 22. Obligation to develop policy).

- To ensure timely and effective implementation of coordinated anti-corruption policies, anti-corruption bodies will cooperate closely with the Agency (Article 23 Paragraph 2).
- In performing tasks within its jurisdiction, the Agency cooperates with other institutions and agencies at all levels, public services and other bodies with public authorizations. Institutions and agencies at all levels, public services and other bodies with public authority are obliged to cooperate with the Agency, and submit all necessary data and information at the Agency's request (Article 24).
- In carrying out tasks within its jurisdiction, the Agency adopts anti-corruption measures, recommendations and instructions, and issues opinions and initiates initiatives (Article 11).

Considering the wide competences of the Agency in the field of corruption prevention, as well as the provisions of the Law on the Agency, it is clear that the Agency represents the central body for the prevention of corruption in BiH. Its key role is reflected in the coordination and supervision of the implementation of systemic anti-corruption activities, which are mainly carried out through the State Strategy for the Fight against Corruption.

The continuous monitoring carried out by the Agency is not limited only to the occasional collection of information on the implemented measures from the Action Plan and the determination of the degree of implementation. It also includes the identification of challenges and obstacles in implementation, as well as providing guidelines for overcoming them, thus ensuring the effectiveness of anti-corruption policies.

An integrated approach to strategic planning, coordinated implementation, regular reporting and monitoring of anti-corruption measures, together with consistent implementation of legal obligations, form the basis of a successful fight against corruption in Bosnia and Herzegovina. However, the Agency's role in monitoring and ensuring the consistent implementation of coordinated anti-corruption policies faces numerous challenges. The decentralization of the corruption prevention system, the large number of actors involved in implementation, and the fact that the Law on the Agency did not foresee a specific system of responsibility for the implementation of defined obligations, represent a risk for the successful coordination of the fight against corruption.

### ***The role of institutions with public powers in Bosnia and Herzegovina***

APIK is responsible for the development, coordination and supervision of the implementation of the State Strategy for the fight against corruption, which includes the adoption of anti-corruption measures and the creation of guidelines that direct and coordinate the activities of institutions with public powers in BiH. These activities can be specific or standardized, and the roles of APIK and institutions in the implementation of anti-corruption activities often overlap and vary - from initiators and implementation coordinators to direct implementers. Also, it is important to emphasize the role of institutions in the development of the State Strategy,

primarily through active participation in the working group for the development of the Strategy, as well as through the opportunity to contribute to that process through public consultations.

The key role of institutions with public powers in BiH in the system of corruption prevention is reflected through their regular activities in accordance with anti-corruption principles, and then through the fulfillment of obligations delegated through anti-corruption policies in BiH or certain anti-corruption measures of the Agency or body for the prevention of corruption at a certain level of government in BiH.

By regularly reporting on progress in implementation, the institutions enable the competent authority to monitor the situation, react to deviations or delays and take the necessary measures. In this context, transparency and accuracy of reporting are key to ensuring accountability and consistency in the fight against corruption.

In the context of the Law on the Agency, below we highlight the provisions relevant to the work of public services with regard to the prevention of corruption, and to the competent action of the Agency in this regard.

- All public services in Bosnia and Herzegovina base their work on the following anti-corruption principles: Equal treatment and non-discrimination, Prohibition of corrupt behavior, Transparency and public control, Protection of reporting corruption (Article 7).
- The Agency is responsible for the prevention of corruption and the coordination of the fight against corruption in public and private sector institutions (Article 9).
- The Agency is responsible for coordinating the work of institutions with public authorities in the fight against corruption (Article 10, Point i)).
- The agency is responsible for informing the competent institutions and the public about obligations based on international legal acts, and making recommendations for their implementation in connection with the prevention of corruption (Article 10. Point p)).
- In performing tasks within its jurisdiction, the Agency cooperates with other institutions and agencies at all levels, public services and other bodies with public authorizations. Institutions and agencies at all levels, public services and other bodies with public authority are obliged to cooperate with the Agency, and submit all necessary data and information at the Agency's request (Article 24).

When it comes to the strategic framework of the fight against corruption at a certain level of government in BiH, it is important that all implementers look at their obligations and act in accordance with the guidelines and recommendations. In this regard, this document contains standardized measures for all levels of government in BiH that are defined through the Action Plan, and the bodies for preventing corruption at a certain level of government should either through their anti-corruption policies or directly delegate and supervise their implementation at a certain level of government. Regularly or at the request of the Agency, the authorities for the prevention of corruption in BiH will collect information on the implementation of standardized activities and deliver it to the Agency for the purpose of drawing up a report on the monitoring of the implementation.

## **Reporting system / Monitoring and Evaluation**

The system of reporting on the implementation of the State Strategy is defined through the normative and strategic framework of the fight against corruption. In this sense, the Agency regularly reports to the competent bodies on the progress in the implementation of anti-corruption measures and strategic documents, primarily to the Parliamentary Assembly of BiH and then to the Council of Ministers of BiH. All those anti-corruption efforts shown in the aforementioned reports are also reflected in international reports that show BiH's overall progress in the fight against corruption and approximation to international standards.

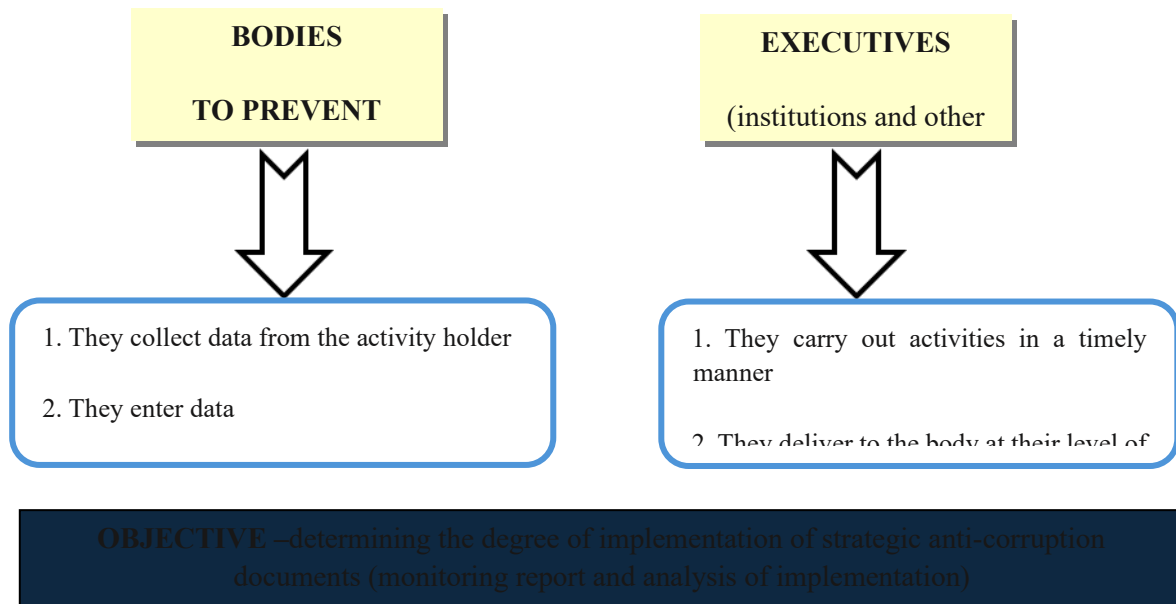
The system of mutual reporting between the Agency and the bodies for the prevention of corruption at all levels of government in BiH will be established in accordance with the needs of monitoring the Strategy and the Action Plan, that is, the needs defined by standardized activities with full respect for the competences of all levels of government in BiH.

The action plan contains 71 activities distributed within 17 specific deadlines for their realization. This system of deadlines ensures the implementation of activities in accordance with a clearly defined pace, enabling regular monitoring and evaluation of the success of the implementation of the Strategy. Defined deadlines for implementation do not allow for flexibility in terms of time, which can negatively affect monitoring and implementation results/status, and lead to a mismatch of efforts. On the other hand, the activities are designed in such a way that they have a clearly defined sequence and course of implementation.

*Tabular overview of deadlines and the number of activities within them according to the Action Plan for the implementation of the Strategy for the fight against corruption 2024-2028.*

<b>Deadlines</b>	<b>No. activities</b>
II quarter of 2024.	2
III quarter of 2024.	1
IV quarter of 2024.	6
Continuously from the 1st quarter of 2025.	3
First quarter of 2025.	3
II quarter of 2025.	2
III Quarter 2025.	1
IV quarter of 2025.	2
First quarter of 2026.	2
II Quarter 2026.	1
IV quarter of 2026.	2
First quarter of 2027.	2
III Quarter 2027.	1
IV quarter of 2027.	3
Continuously	34
IV quarter 2028/Continued	3
IV quarter of 2028.	3
<b>TOTAL</b>	<b>71</b>

*Schematic representation of the role of the body/enforcer in the process of monitoring the implementation of anti-corruption documents*



In accordance with its competences, the Agency will carry out regular supervision over the implementation of the Strategy and the Action Plan and prepare annual reports on the monitoring of implementation. All activities that are an integral part of the Action Plan, the Agency will analyze through the following indicators for assessing progress: availability, progress within the time limit, progress in the scope of implementation, quantitative indicators, quality of implementation and relevance. When it comes to evaluation, it is necessary to ensure an independent external evaluation in order to ensure the necessary objectivity in the analysis of the effects and success of the strategic document. The action plan envisages that the external evaluation is carried out twice, during the implementation period (mid-term evaluation) and after the implementation period (ex post evaluation).

The monitoring and evaluation system of the Strategy and Action Plan is of key importance because it provides timely information on the degree and effects of implementation, enables early identification of possible weaknesses in implementation, and serves as a basis for the Agency's competent action in the context of giving opinions and instructions on implementation<sup>16</sup>. Also, the mentioned system provides a high-quality basis for revising the Action Plan, which ensures the continuous improvement of the effectiveness of the implementation of the Strategy and the Action Plan. In this regard, the quality of the information that will be collected through monitoring and evaluation is very important in order to ensure reliable and objective reports.

Given that the Agency has developed an application solution for proactive monitoring of the implementation of strategic anti-corruption documents in BiH, we believe that, with the support of strategic partners in the fight against corruption, this application will soon be put into operation. It is planned to be available to all bodies for the prevention of corruption and implementers, while ensuring adequate education for its effective use.

<sup>16</sup>Article 10, item b) of the Law on the Agency for Prevention of Corruption and Coordination of the Fight Against Corruption ("Official Gazette of BiH", number: 103/09,58/13)

Given the decentralized nature of the corruption prevention system in BiH, the existence of a large number of implementers at different levels of government, and the absence of an accountability system, there will be several key risks/challenges before monitoring the implementation of the State Strategy:

- **Lack of coordination and alignment:** Different levels of government may have different priorities, resources and capacities, which may lead to uneven implementation of anti-corruption measures. Therefore, it is important to establish a clear system of coordination and communication, with defined guidelines and standardized procedures. The agency should regularly organize work-consultative meetings and trainings so that all implementers have a unique understanding of goals and obligations.
- **Incomplete or inaccurate reporting:** Implementers at different levels may submit imprecise, incomplete or late reports, which makes timely monitoring and adoption of corrective measures difficult. That is why the Agency will try to put into operation the "Proactive Monitoring" application, which will enable uniformity and easier monitoring of results in real time, provided that the implementers update the data regularly and in a timely manner.
- **Political and institutional resistance to change:** Certain levels of government may resist the implementation of anti-corruption measures due to political or other interests, which may weaken the overall anti-corruption effort. Therefore, it is necessary to work on strengthening political will through constant dialogues, raising awareness and involving international partners who can put pressure on the authorities to consistently implement measures. Introducing transparency into the work of the implementer and publicizing the results can reduce resistance and increase accountability.
- **Insufficient capacities:** Some enforcers may have limited resources, capacities or expertise to implement anti-corruption measures. In this regard, it is necessary to provide targeted support through training, technical assistance and resources in order to strengthen the capacities of these institutions.

For the realization of strategic goals and activities, institutions/bodies for the prevention of corruption in BiH will use financial resources planned within their regular annual budgets, as well as international project and bilateral support and the help of external partners in the implementation of specific activities.

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