

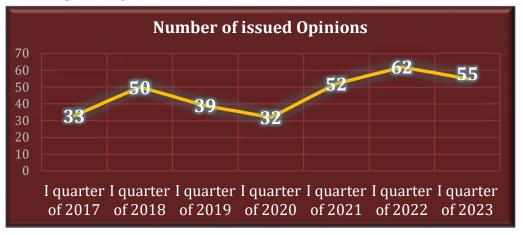
Montenegro Agency for Prevention of Corruption

SUMMARY OF THE FIRST QUARTERLY WORK REPORT IN 2023

Podgorica, May 2023

PREVENTING CONFLICTS OF INTEREST OF PUBLIC OFFICIALS AND RESTRICTIONS IN EXERCISING PUBLIC FUNCTIONS

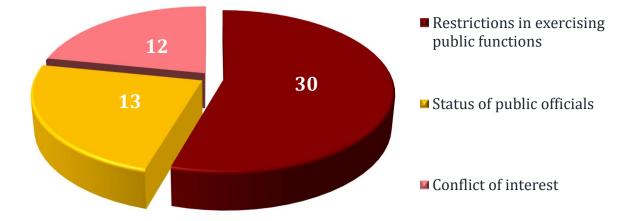
In the first quarter of 2023, acting on all received requests, the Agency for Prevention of Corruption (APC) issued **55 Opinions** on the existence of conflicts of interest and restrictions in exercising public functions, thus maintaining the continuity of a large number of requests and opinions given in this area.



- Out of the total number of opinions given, **23.6% (13) were negative**, that is, it was stated in them that **there is a limiting factor** in relation to the statements in the request for giving an opinion;
- **24 Opinions are positive** (there is no limiting factor in relation to the statements in the request);

• **5 Opinions** refer to the membership of public officials in the management bodies and supervisory bodies of a public company, public institution or other legal entity, where it was stated that a public official can be a member of the said management bodies or supervisory bodies, but that on the basis of said membership they cannot have income or other remuneration;

• **13 Opinions** refer to the status of public officials according to Article 3 of the LPC.



Number of Opinions by fields

In the first quarter of 2023, the Agency **initiated 6 administrative procedures in the field of restrictions in exercising public functions**.¹

Based on the given Opinions of the Agency, **5 resignations of public officials were submitted**, while, after the given opinions, **2 transfers of management rights in the company** were also noted, as well as **1 termination of the service contract due to a determined conflict of interest**.

Due to the violation of the provisions of the LPC relating to **restrictions in the exercise of public functions**, in the first quarter of 2023, the Agency submitted **1 request to initiate misdemeanor proceedings** to the competent misdemeanor courts.

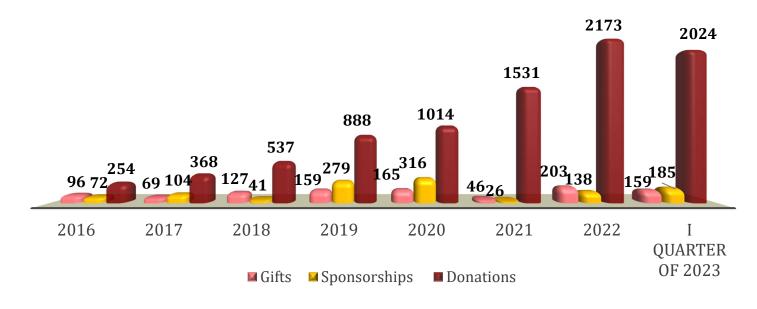
CONTROL OF RECEIVED GIFTS, DONATIONS AND CONCLUDED SPONSORSHIPS

In the first quarter of 2023:

- **25 authorities** reported to the Agency a total of **159 gifts** received during 2022, while a total of **136 authorities** at the state and local level submitted notifications that **they did not receive gifts** in 2022;
- **38 authorities** reported a total of **185 sponsorships** from 2022;
- 238 authorities reported a total of 2,024 donations;
- **116 authorities** submitted notifications that **they did not receive donations and sponsorships** in 2022.

Acting preventively, in the first quarter of 2022, the Agency **sent letters and notifications to the authorities about their legal obligation** to submit excerpts from the records of gifts and reports on received sponsorships and donations with accompanying documentation, by the end of March for the previous year.

Number of reported gifts, sponsorships and donations by years



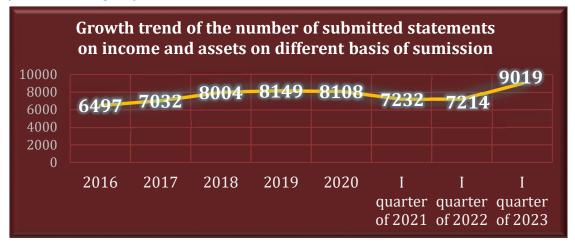
¹ They also referred to restrictions in the exercise of public functions, as well as to incorrect data in the statements

All submitted excerpts from the records of gifts and reports on received sponsorships and donations were administratively checked and published on the APC website², while the **determination of all possible irregularities in the excerpts / reports will be done during the second quarter of 2023**.

In the reporting period, due to the failure to submit reports on received donations and sponsorships with a copy of the documentation, **4 cases** from the previous year **were closed** based on requests to initiate misdemeanor proceedings, of which **sanctions (warnings) were issued in 2 cases**.

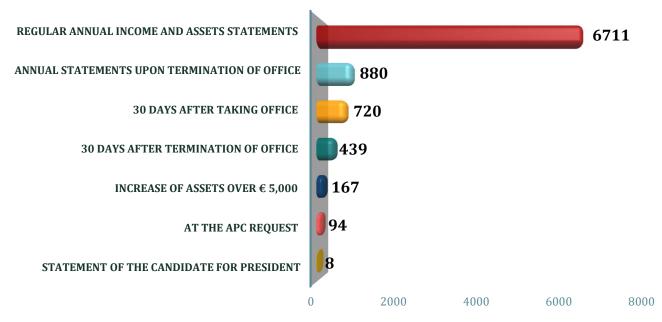
VERIFICATION OF INCOME AND ASSETS STATEMENTS

By March 31, 2023, a total of 9,019 statements on income and assets were submitted to the Agency on different basis of submission, which is 25% more compared to the same reporting period of the previous year, and more compared to the annual levels of the first five years of the Agency's work.



Also, the number of **regular annual statements** submitted in the first quarter of 2023 is **20% more compared to the same period last year**. Specifically, a total of **6,711** submitted regular annual statements on income and assets were recorded.

² <u>https://portal.antikorupcija.me:9343/acamPublic/poklonSearch.htm</u> <u>https://portal.antikorupcija.me:9343/acamPublic/donacijaSearch.htm</u>



By the end of the first quarter, all received statements were **administratively and technically processed**.

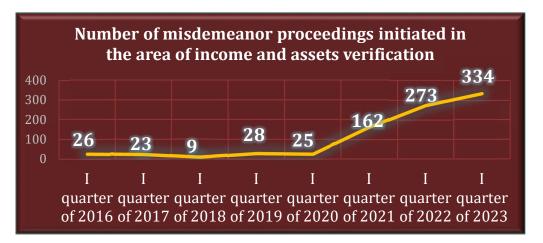
It is planned to increase the **volume of work** in this area, given that the Annual Verification Plan for 2023 envisages a **significantly higher number of verifications of the accuracy and completeness** of data in income and assets statements when compared to previous years - as many as **1,496 statements**. This type of verification will begin in the second quarter and will last until the end of the year. **The number of verified statements in terms of accuracy and completeness will be even higher**, bearing in mind that the competent Section checks statements **ex officio** as well as **upon request**. In this regard, the competent Section already in the 1st quarter, **started verification of 12 statements on income and assets** ex officio.

Additional verification of statements, in accordance with the Annual Verification Plan for 2023, will start in the II quarter and will last until the end of the year. Regarding the additional verification that began in the 3rd quarter of 2022, in the 1st quarter of 2023, control was initiated for 20 public officials. In all 20 cases in the control procedure, possible violations of the provisions of the LPC were determined.

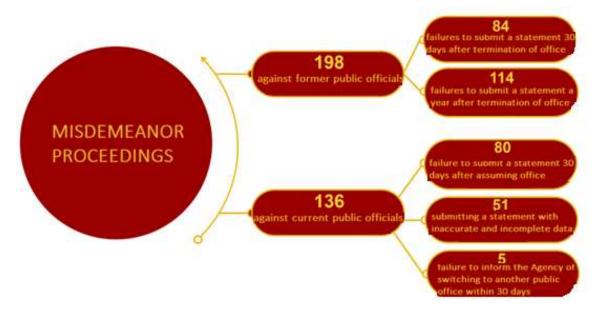
In the first quarter of 2023, the Agency **initiated 28 administrative procedures in the area of income and assets declaration**. ³

The number of misdemeanor proceedings initiated in the first quarter of 2023 in this area is significantly higher compared to the same reporting periods of all previous years of the Agency's work, which was primarily generated by the intensive work and proactive approach of the APC.

³ Out of these, 6 related to incorrect data and restrictions on the exercise of public functions



With a **non-selective approach**, the Agency **initiated misdemeanor proceedings against both former and newly appointed public officials**.



During the first quarter of 2023, a total of 267 misdemeanor proceedings (including those from previous years) were completed, of which sanctions were imposed in 86.14%. The total amount of fines is &21,945.

CONTROL OF FINANCING OF POLITICAL ENTITIES AND ELECTION CAMPAIGNS

In the area of **financing political entities and election campaigns**, the Agency continued to implement activities in a planned and systematic manner in order to consistently monitor the implementation of the Law on Financing of Political Entities and Election Campaigns (LFPEEC) and control the implementation and compliance with all prescribed prohibitions and restrictions during the election campaigns:

- By the decision of the President of Montenegro from December 28, 2022, **elections for councilors in the Tuzi Municipality Assembly** were announced, which were held on March 5, 2023;
- By the decision of the President of the Parliament of Montenegro from January 16, elections for the President of Montenegro were announced, which were held on March 19, 2023;
- By the decision of the President of Montenegro from March 17, 2023, **early elections for members of the Parliament of Montenegro** were announced, which will be held on June 11, 2023.

The fact that the obligations, prohibitions and restrictions prescribed by the Law were applied on the territory of the whole of Montenegro, once again caused **a significant part of the personnel capacities of APC to be directed to the monitoring and control of the campaign**.

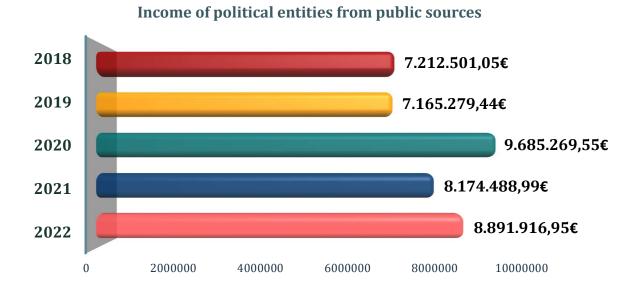
According to all bases of the Agency's work in this area, in the 1st quarter of 2023, the APC conducted control of 19,002 reports submitted by subjects to the LFPEEC on regular work and during election campaigns.

When it comes to the regular work of subjects to the LFPEEC, a total of 146 reports/documents were submitted, of which 94 were reports/notifications of political entities.⁴

Categories of submitted reports/notifications	Number of submitted reports	Number of registered subjects to the Law
Consolidated Annual Report for 2022	48	67
Decisions on the amount of the membership fee for 2023	46	67

⁴ The Agency, in accordance with its legal powers, supervises the implementation of the obligation of the Ministry of Finance and 25 local administrations bodies responsible for financial affairs to make a Decision on the amount of budget funds for financing the regular work of political entities by January 31 at the latest, and then publish it on to their website within seven days of adoption. In this regard, a total of 26 decisions on financing regular work and 26 decisions on financing the work of women's organizations were made in the first quarter.

Preliminary analyzes of the data from the submitted reports of political entities show a further **increase in the income that entities receive from public sources**, which make up **94% of the total income that political entities** have achieved in 2022.



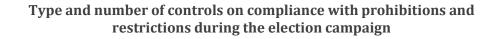
In the context of election campaigns, **the Agency controlled a total of 18,856 reports** and other supporting documentation:

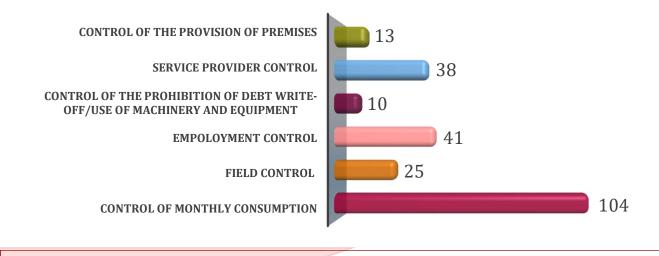
- ✓ 60 by political entities/electoral lists;
- ✓ 18,593 by authorities;
- ✓ 203 by media advertising service providers.

Proactively, the Agency sent a total of **596 warnings** (570 to authorities and 26 to political entities) in order to submit reports within the deadline, as well as in the case of observed technical irregularities, to which all responded positively.

While performing substantial and in-depth control of activities, collected and spent funds of political entities in the campaign, the Agency monitors the activities of political entities from the beginning of the campaign, obtains documentation related to those activities, controls the given conditions and possibly given discounts, etc. Part of the service providers also submitted price lists and regularly submit documentation, while for the election campaign for the election of the President of Montenegro, 42 of them were requested documentation on the services provided to political entities in the campaign. A total of **172 activities were recorded by 86 service providers**. The total value of the controlled funds spent in the campaign based on recorded activities, until the end of the first quarter, amounts to €1,135,146 for all subjects-candidates for the President of Montenegro.

In the 1st quarter, a total of 231 controls on compliance with prohibitions and restrictions during election campaigns were carried out as well.





The agency imposed ten measures on political entities, specifically:

- ✓ 1 measure of loss of the right to transfer funds for financing regular work;
- ✓ 1 measure of loss of the right to transfer funds for financing the election campaign;
- ✓ 2 measures of partial loss of budget funds for the costs of financing the election campaign;
- ✓ 6 measures to suspend the transfer of budget funds for financing election campaign costs.

Due to **violation of the provisions of the LFPEEC**, in the first quarter of 2023, the Agency submitted **69 requests for initiation of misdemeanor proceedings to the competent misdemeanor courts**.

During the reporting period, a total of **86 procedures were completed** (including those from previous years), of which **sanctions were imposed in 94.2%**. The total amount of fines is \in **5**,**725**.

In the reporting period, a total of **80 complaints** were filed due to suspected violations of the LFPEEC (six related to the local elections held in 2022). The agency acted on all complaints:

- ✓ in 31 cases, a decision was made not to proceed;
- ✓ in 23 cases, a decision was made that there was no violation of the law;
- ✓ other procedures are **ongoing**.

ADOPTION AND IMPLEMENTATION OF INTEGRITY PLANS

In the first quarter of 2023, **1 authority adopted a decision on the appointment of an integrity manager for the first time**, and **25 authorities** informed the Agency about changing integrity manager, that is, about the appointment of a new person as an integrity

manager. **The total number of authorities that appointed an integrity manager as of January 1, 2016 is 730** (98.8% of the total number of authorities).

During the reporting period, 1 authority adopted and submitted an integrity plan to the Agency for the first time. A total of **729 authorities submitted an integrity plan** to the Agency as of January 1, 2016 (98.6% of the total number of authorities). A total of **3 revised integrity plans** were also submitted to the Agency.

In the reporting period, a total of **167 reports on the implementation of the integrity plan in 2022 were submitted to the Agency**.

In the first quarter, the APC Council adopted the **Report on the Adoption and Implementation of Integrity Plans in 2022**, which contains a **detailed analysis** of integrity plans and reports on their implementation, as well as **recommendations for improving integrity plans**, given within the ten systems in which authorities are classified. The report includes all integrity plans that were submitted to the Agency from 2016 to the end of 2022, as well as an **analysis of information from 704 reports on the implementation of the integrity plan** that were submitted to the Agency during 2022.

In November 2022, the Agency developed the Methodology for assessing the application of anti-corruption measures in the justice system, in cooperation with the United Nations Development Program (UNDP) in Montenegro, within the project of "Zero tolerance to corruption: Strengthening integrity, transparency and accountability in public administration in Montenegro". The project aims to improve the content and effects of integrity plans of judicial bodies. The methodology includes the development of criteria and indicators based on integrity plans, on the basis of which the scoring and ranking of authorities in the aforementioned system will be performed.

In December 2022, a special IT application was developed for the implementation of the Methodology, and during December, all judicial authorities submitted to the Agency documentation proving the fulfillment of the indicators provided for in the Methodology, so **during the first quarter of 2023**, an **assessment of the application of anti-corruption measures was carried out in the judiciary and the prosecution**. The results of the application of the Methodology will be presented in the II quarter.

APC originally developed the Methodology for assessing the application of anti-corruption measures in 2021, and applied that version of the Methodology to two systems: state administration and social and child protection.

In the coming period, it is planned to apply the Methodology to authorities from the other seven sectors: local self-government, education, health care, state-owned enterprises, enterprises owned by local self-government units, independent and regulatory bodies and culture, with the Methodology being adapted to the specifics of selected sectors.

In the reporting period, **three cases** upon requests to initiate misdemeanor proceedings from the previous year **were completed** and **sanctions were imposed in all of them - two warnings and one fine** in the amount of **€150**.

CONTROL OF LOBBYING ACTIVITIES

In the 1st quarter of 2023, one invitation was published for candidates to take the lobbying exam and one exam was organized. Two certificates of passing the lobbying exam were issued.

Currently, nine natural persons and one legal entity are registered in the register of lobbyists, and all of them have submitted their work report for 2022 to the Agency, within the deadline defined by law.

The Ministry of Justice, Human and Minority Rights formed a **Working Group for the drafting of the Draft Law on Lobbying** in September 2021, whose members are APC officials. The Agency and the law proposer were provided with expert assistance in finalizing the solutions for amending the regulatory framework in this area, within the Horizontal Facility for the Western Balkans and Turkey II. During the drafting of the draft, findings from the Peer Review mission on the functioning of APC held in April 2021 were taken into special consideration. A public debate on the Draft Law on Lobbying was conducted in 2021.

The Ministry of Justice submitted the Draft Law on Lobbying to the European Commission for an opinion in June 2022. In January 2023, the European Commission provided comments on the Draft Law and recommendations. **Representatives of the Agency participated in three working group meetings in January 2023 to align the Draft Law with the recommendations of the European Commission**. The working group considered almost all recommendations, following which the Ministry of Justice submitted a new version of the Draft to the European Commission.

ACTING ON WHISTLEBLOWERS REPORTS AND WHISTLEBLOWERS PROTECTION



2019

2020

2021

2022

2023

2018

2016

2017

In the first quarter of 2023, there were **57 whistleblower reports, the most since the beginning of the work of the APC at the level of the first three months of the year**.

Of the total number of whistleblower reports in the first quarter of 2023, **28 were submitted anonymously.**

In the first quarter of 2023, there were **249 whistleblower reports** in the work before the Agency (including 192 reports from the previous period).

A total of 12 whistleblower reports have been completed, out of which 1 has been determined to involve a threat to the public interest, specifically within the judicial system. The Agency has provided a total of **3 recommendations** to the subject to the law to improve transparency and address corruption risks, with the deadline for implementation falling within the upcoming period.

Additionally, during the reporting period, the Agency concluded **one ex officio procedure initiated from the previous period, which determined the existence of a threat to the public interest**. In relation to this procedure, the Agency provided **1 recommendation** to the subject to the law to improve transparency and address corruption risks, with the deadline for implementation falling within the upcoming period. Two recommendations from the previous period have been implemented.

During the reporting period, no procedures were forwarded to the **competent prosecution authorities**. The Agency has forwarded **three reports to other competent institutions**, while there are currently 32 ongoing procedures before other competent bodies related to whistleblower reports from the previous period.

During the first quarter of 2023, **two requests for whistleblower protection** were submitted, which are ongoing. Work continued on the procedures for whistleblower protection requests from 2022.

In the first quarter of 2023, the Agency submitted **6 requests to the competent misdemeanor courts to initiate misdemeanor proceedings** in this area. **Two proceedings from the 2022 requests have been concluded, with one resulting in a sanction (warning) being imposed.**

Montenegro, through the Agency as the national coordinator, **became a full member of the Network of European Integrity and Whistleblowing Authorities (NEIWA)** during the 8th plenary session held in Rome in March. Previously, Montenegro had observer status within the Network.

Established in May 2019, the Network of European Integrity and Whistleblowing Authorities brings together 36 institutions from European Union countries and candidate countries. Its purpose is to exchange knowledge and experiences in the field of integrity and whistleblowing.



MONITORING LEGISLATION AND GIVING OPINIONS ON REGULATIONS IN THE FIELD OF ANTI-CORRUPTION

In the first quarter of 2023, the Section for Monitoring of Legislation and Giving Opinions on Anti-Corruption Regulations prepared:

- Opinion on the Draft Law on the Public Broadcasting Service of Montenegro;
- Opinion on the Conclusion of the Parliament on the formation of the Working Group for the preparation of the Draft Law on Amendments to the Law on Prevention of Corruption;
- and Opinion on the Draft Law on Health Care.

Also, the following are in the final phase:

- Opinion on the Law on Wages of Public Sector Employees;
- **Opinion on the Law on Public Procurement**, with special reference to the latest amendments; and
- An initiative to the Parliament of Montenegro on the need to harmonize the Law on the Financing of Political Entities and Election Campaigns with the Law on Misdemeanors, the Law on Labor and the Law on the Election of Councilors and Members of Parliament.

During the reporting period, work has commenced on four additional opinions:

- **Opinion on the Law on Minority Rights and Freedom**s, specifically regarding the functioning of the Fund for the Protection and Exercising of Minority Rights, as well as the Statute that further elaborates on the Fund's operational procedures.
- **Opinion on the Law on Pension and Disability Insurance** and the Statute of the Montenegrin Pension and Disability Insurance Fund, focusing on the criteria and authorities of the Fund's bodies (Management Board and Director).
- **Opinion on the Law on Mandatory Health Insurance** and the Statute of the Health Insurance Fund of Montenegro, with regard to the criteria and competences of the bodies of the Health Insurance Fund (Management Board and Director).
- **Opinion on the Law on the Labor Fund and the Statute of the Labor Fund**, specifically addressing provisions that carry corruptive risks, with a particular emphasis on the Management Board and the Director.

The Agency was involved in the work of working groups for the development of:

- **The Draft Law on Lobbying** (in the part of providing comments on the Draft Law on Lobbying in accordance with EC recommendations, and comments for amendments to the Law on Lobbying to the Ministry of Justice in the part of violations of the law), and

- **Draft Law on international restrictive measures** (in the sense of preparing a review of the latest version of the proposal for a new law on international restrictive measures).

In this way, the Agency had significantly more space to review the essence of legal acts and to act in a timely manner and contribute to the elimination of corruption risks from the regulation itself in the draft phase.

MANAGEMENT OF ADMINISTRATIVE PROCEDURES UNDER THE COMPETENCE OF APC

In the area of conducting administrative proceedings, in the first quarter of 2023, **28** administrative proceedings were initiated against public officials in the area of declaration of income and assets and restrictions on the exercise of public functions. Also, the Agency initiated **80 procedures for all the complaints it received due to suspected violations of the LFPEEC**.

INITIATION OF MISDEMEANOR PROCEEDINGS AND ISSUANCE OF MISDEMEANOR WARRANTS

In the first quarter of 2023, due to violations of anti-corruption laws, the Agency submitted a total of **410 requests for initiation of misdemeanor proceedings** to the competent misdemeanor courts:

- ✓ **341** due to violation of LPC;
- ✓ **69** due to violation of LFPEEC.

In that period, a total of **362 procedures were completed** (including procedures based on requests from previous years), of which **sanctions were imposed in 87.6%**. The total amount of fines is **€27,820**.

Due to violations of anti-corruption laws under its jurisdiction, the Agency initiated **37.6% more misdemeanor proceedings in the first quarter of 2023 compared to the same reporting period last year and significantly more compared to the same reporting periods of previous years of APC work**. This was primarily generated by a greater number of initiated procedures in the area of income and assets verification and control of the financing of political subjects and election campaigns.



ANTI-CORRUPTION CAMPAIGNS, PUBLIC RELATIONS, RESEARCH AND EDUCATION

Through the implementation of campaigns, educational activities, and cooperation with the media, the Agency contributes to strengthening the knowledge of the general public and the subjects to anti-corruption laws regarding the competencies and results of this institution, as well as fostering citizens' trust in its work.

In the first quarter, on the Agency's website, as well as on its YouTube channel and social media accounts on Facebook, Twitter, and LinkedIn, a **video spot-animation was posted with the aim of promoting reporting of corruption** and informing the public about whistleblower protection. This video spot-animation was prepared in 2022 as part of a project funded and implemented by the United Nations Development Program (UNDP) in Montenegro.

In the first quarter, the **Training Plan for those subject to the law under the jurisdiction of the APC for 2023** was prepared and adopted. The officials of the Section for Integrity and Lobbying held **two online trainings** (on March 29 and 31, 2023) on the topic of creating and implementing integrity plans, for integrity managers and other employees who participate in this process.

The Training Plan for APC employees in 2023 was prepared and adopted. In cooperation with institutions in Montenegro, as well as international partners, **employees of the Agency attended 12 trainings in the first quarter.**

Transparency has been strengthened through greater openness towards the media, as evidenced by the fact that the **trend of a favorable media image of the Agency has continued** - this is evidenced by the ratio of positively (553) and negatively intoned media announcements (216), which is crucial for creating an image.

The share of planned placements (734) was higher than unplanned placements (580), which testifies to the fact that the **Agency achieved good control over its media presence**.

In the presence of the diplomatic corps representatives, international partners and the media, the Agency organized a traditional working breakfast on February 27, during which the Director and the President of the Council presented the key results of the work of this institution in 2022, as well as the contribution of the Agency, as a key institution in this area and the bearer of the implementation of important temporary benchmarks in the negotiation chapter 23 - Judiciary and fundamental rights, in the efficient and effective fight against corruption and the affirmation of the environment of the rule of law in Montenegro.



COOPERATION WITH CIVIL SOCIETY

Demonstrating institutional commitment to cooperation with the NGO sector, the Agency continued the practice of holding meetings with representatives of non-governmental organizations during election campaigns. Two such meetings were held in the first quarter. The first meeting was attended by representatives of the Center for Civic Liberties (CEGAS), the Center for Development of Non-Governmental Organizations (CRNVO), the Center for Civic Education (CGO), and the Center for Monitoring and Research (CeMI), while the second meeting included representatives from CeMI as well as the Civic Alliance (GA). Both meetings focused on the activities undertaken by the Agency in monitoring and supervising the presidential election campaign.

Recognizing the civil sector as a partner in promoting the rule of law, the Agency for Prevention of Corruption will continue to organize consultative meetings with nongovernmental organizations.





INTERNATIONAL COOPERATION

During the reporting period, the Agency's delegation was on a study visit to the Republic of Croatia, during which they met in Zagreb with the Minister of Justice and Administration, **Ivan Malenica**, the President at Commission for the Resolution of Conflicts of interest, **Nataša Novaković**, the Secretary of the Commission, **Ivan Matić**, the State Secretary **Juro Martinović** and Head of Anti-Corruption Sector, **Mladen Bručić-Matic**. The discussions during the meetings revolved around the anti-corruption system in Croatia, legislative activities in the fight against corruption, implementation of the Anti-Corruption Strategy, as well as projects and initiatives undertaken by the Government of the Republic of Croatia in the field of anti-corruption. The delegations exchanged experiences and expressed readiness for further collaboration in the area of anti-corruption policy development.



In the first quarter, as part of Phase III of the "Horizontal Facility for the Western Balkans and Turkey," the Agency, in collaboration with experts from the Council of Europe, continued its **comprehensive analysis of the Law on Prevention of Corruption**, which began last year, and is being conducted in three phases.

The first two phases were completed in 2022, while the third phase focuses on **analyzing the provisions of the Law relating to whistleblowers, integrity, misdemeanor and administrative procedures**. Upon completion of the analysis, **the need for drafting a new law or preparing amendments to the existing law will be considered**, and there will be an assessment of the **need to develop a separate law on whistleblower protection**, in accordance with EU Directive 1937/2019.

Showing commitment to international cooperation and institutional development, the Director of the Agency participated in the panel discussion "Implementation and assessment of anticorruption policies", on March 21, in Sofia, within the regional forum "Anticorruption policy as a guarantee for national security. stability and sovereignty", as part of the "Summit for Democracy" platform. The event, which was opened by the President of the



Republic of Bulgaria **Rumen Radev**, was organized by the Ministry of Justice of the Republic of Bulgaria, the Center for the Study of Democracy (CSD) and the Basel Institute for Governance. The forum brought together anti-corruption leaders from Southeast Europe and the Black Sea region in order to exchange experiences and practices.



At the invitation of the Deputy Prime Minister of North Macedonia in charge of good governance policies, **Slavica Grkovska**, the Director of the Agency participated in the **founding meeting of the Southeast Europe Women Leaders' Good Governance and Anti-Corruption Forum (SEE WGGALF**), held in Skopje.

The event, to which the hosts devoted considerable importance, was supported by the United Nations Entity for Gender

Equality and the Empowerment of Women (UN Women), the Regional Anti-Corruption Initiative (RAI) and the United Nations Office on Drugs and Crime (UNODC).

In the reporting period, the Agency for Prevention of Corruption organized a ceremony on the occasion of the **introduction of ISO 9001:2015**, which was attended by representatives of donors - the US Embassy in Podgorica, representatives of the Center for Certification and Supervision from Belgrade and the company "Nacor" from Budva.

By introducing the ISO quality management standard, the Agency confirms its commitment to strengthening responsibility in the work, professionalism and quality of work of all employees.

