



Montenegro  
Agency for Prevention of Corruption

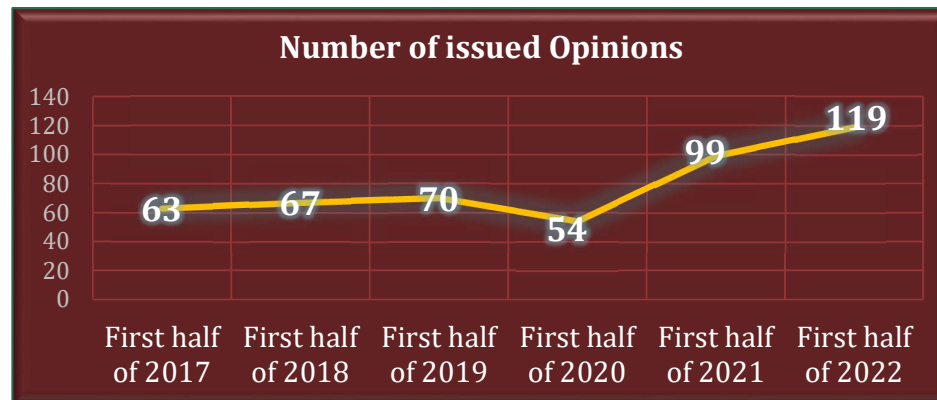
**SUMMARY OF RESULTS OF THE APC WORK  
IN THE FIRST HALF OF 2022**

APC

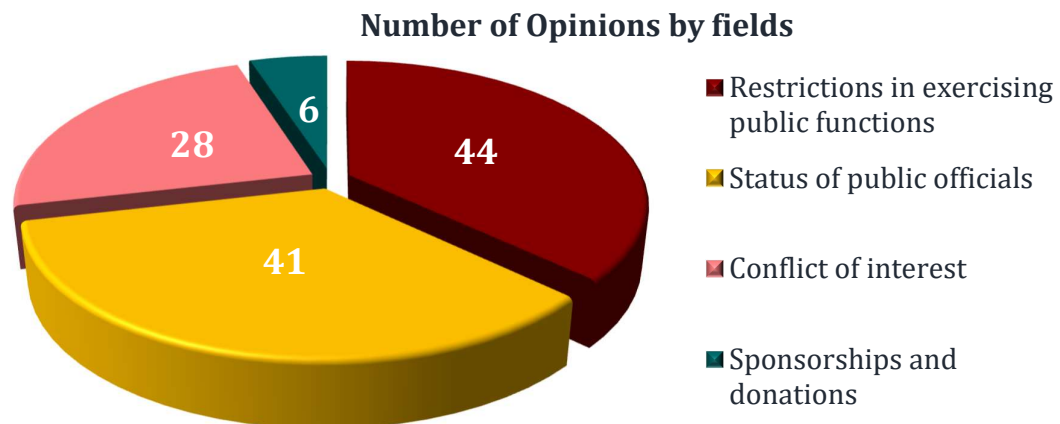
Podgorica, July 2022

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

In the first quarter of 2022, acting on all received requests, the Agency for Prevention of Corruption (APC) issued **119 Opinions on the existence of conflicts of interest and restrictions in exercising public functions, 20,2% more than in the same reporting period of the previous year and the highest on a half-yearly basis since 2017.**



This is the **result of an intensive campaign** aimed at raising the awareness of public officials regarding compliance with the obligations prescribed by the Law, but **also the growth of trust in APC, its importance and quality of work.**



In the first six months of 2022, the Agency initiated **11 administrative procedures** in this field (10 prevention of conflicts of interest and 1 restriction in exercising public functions). **16 procedures** (including cases from the previous period) **were completed and violations of the Law - 10 conflicts of interest and 4 restrictions in exercising public functions were found in 14 Decisions.**

Based on the issued Opinions and the adopted Decisions of the Agency, **8 resignations of public officials were submitted** (7 after the issued Opinions and 1 on the basis of the Decision), while **1 transfer of management rights in the company** was noted, as well as **1 decision on termination of employment in the state-owned company.**

Due to the violation of the provisions of the LPC relating to **restrictions in the exercise of public functions**, the Agency submitted **1 request to initiate misdemeanor proceedings** to the competent misdemeanor courts. **1 proceeding was completed**, based on the request from 2021, in which a **warning was issued and property benefit in the amount of €474.30 was confiscated**.

### CONTROL OF RECEIVED GIFTS, DONATIONS AND CONCLUDED SPONSORSHIPS

Within the legal deadline until the end of March:

- **203 gifts received during 2021 were reported to the Agency by 22 authorities**, while a total of **160 authorities** at the state and local level submitted **notifications that they did not receive gifts** in 2021;
- **137 sponsorships** were reported by **30 authorities**;
- **2,168 donations** from 2021 were reported by **229 authorities**;
- **131 authorities** submitted a notification **that they did not receive donations and sponsorships** in 2021.

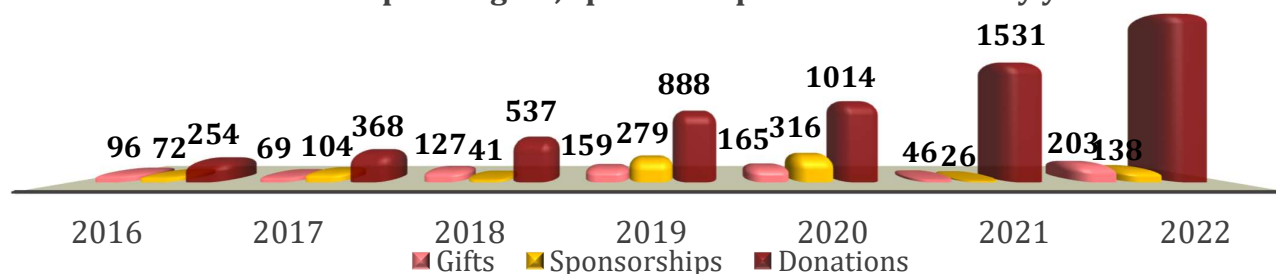
In the second quarter of 2022:

- ✓ a total of **1 sponsorship and 5 donations** were reported to the Agency **by 1 authority**;
- ✓ **9 authorities** submitted a notification that they **did not receive donations and sponsorships** in 2021

In 2022, the **trend of growth of reported donations continued (42% more than in the previous year)**, and the **growth of reported gifts was recorded (four and a half times more than in the previous year and the most since the establishment of the APC)**, and the **number of reported sponsorships is higher (five times more than in the previous year)**.

Acting preventively, in the first quarter of 2022, the Agency **sent official 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 2173



All submitted excerpts from the records of gifts and reports on received sponsorships and donations were **administratively checked and published on the APC website**<sup>1</sup>, while based on the verification of the reports received in the second quarter of 2022, **a total of**

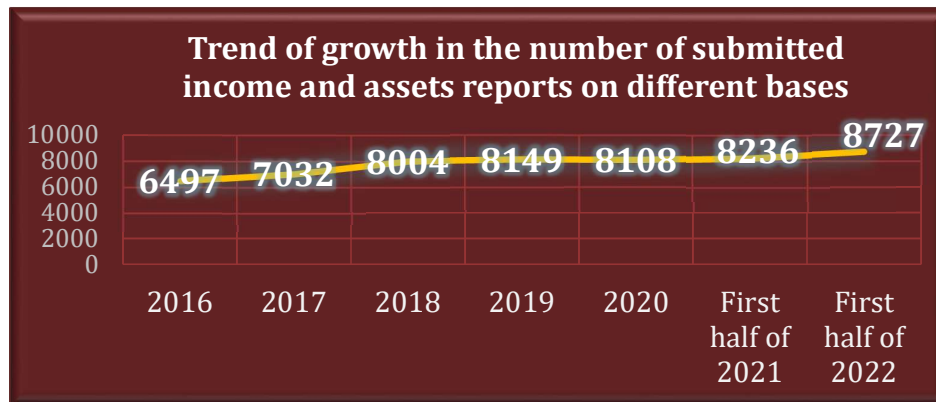
<sup>1</sup> <https://portal.antikorupcija.me:9343/acamPublic/poklonSearch.htm>  
<https://portal.antikorupcija.me:9343/acamPublic/donacijaSearch.htm>

**27 irregularities were determined, on the basis of which misdemeanor proceedings were initiated:**

- ✓ **26 requests** for initiation of misdemeanor proceedings **due to violation of the provisions of the LPC, which prescribes the obligation of authorities to submit a report on received donations with a copy of the documentation to the Agency by the end of March of the current year for the previous year;**
- ✓ **1 request** due to violation of the provisions of the LPC, which stipulates the obligation to refuse gifts in cases provided for by law.
- ✓

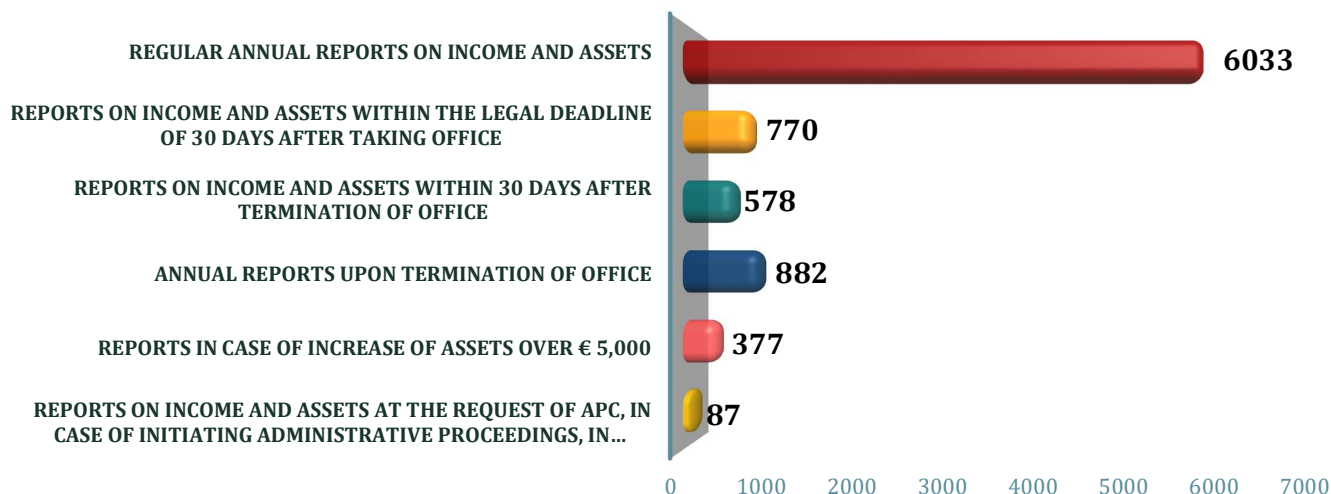
**VERIFICATION OF REPORTS ON INCOME AND ASSETS OF THE PUBLIC OFFICIALS**

**In the first half of 2022, a total of 8,727 reports on income and assets were submitted to the Agency on different basis of submission, which is 6% 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.**



The growth in the number of submitted reports is a consequence of **the increase in the number of newly appointed public officials**, as well as a larger **number of reports submitted by public officials upon termination of office**. This further increased the **scope of work** of the competent Department, especially in the part of administrative and technical verification of reports.

## Summary of results of the APC work in the first half of 2022



**All received reports were administratively and technically processed.** On that occasion, **25 reports of public officials were recorded, indicating irregularities in the domain of restrictions on the exercise of public functions.** The Agency initiated an ex officio control procedure against them.

From January 1 to June 30, 2022, a total of **6,033 regular annual reports on income and assets were submitted.** **In the legally prescribed deadline until March 31, 2022, public officials and civil servants submitted 5,659 reports,** which means that **95% of them fulfilled their legal obligation.** **The percentage of fulfillment of this legal obligation in 2022 is about 5% higher than in 2021 (90.12%).**

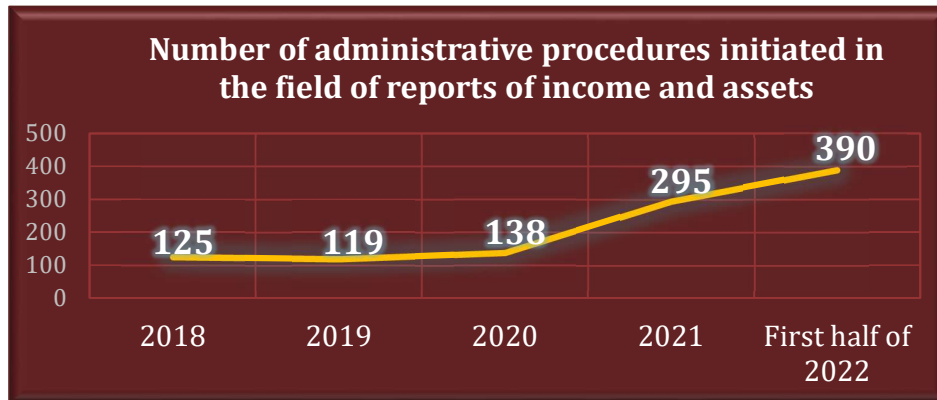
In the second quarter, in accordance with the Annual Verification Plan, **a verification of the accuracy and completeness of the data in the reports on income and assets started.** In this regard, **749 reports on income and assets were verified,** which means that **56.3% of the 1,330 reports have already been verified.** In addition, the competent Department, **acting ex officio,** in the first half of 2022 **started the verification of the accuracy and completeness of additional 38 reports on income and assets.** In 16 reports, possible violations of the law were determined and the cases were submitted to the competent Department for initiating administrative and misdemeanor proceedings.

**Additional verification of reports,** as the most complex form of control of income and assets of public officials, in accordance with the Annual Verification Plan for 2022, **began in the II quarter and will last until the end of the year.**

In connection with the additional verification that began in the third quarter of 2021, by the end of March 2022, **proceedings were initiated against 20 public officials** who were the subject of that verification, and all of them are ongoing.

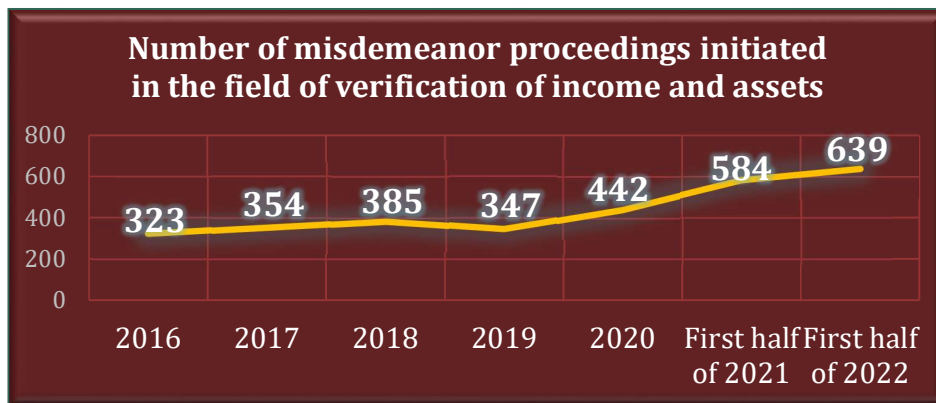
**In the first half of 2022 alone, the Agency initiated 390 administrative procedures in the area of reports on income and assets, significantly more compared to the annual level of the previous four years of operation, which was primarily**

generated by a larger number of initiated administrative procedures related to inaccurate and incomplete data in the reports.

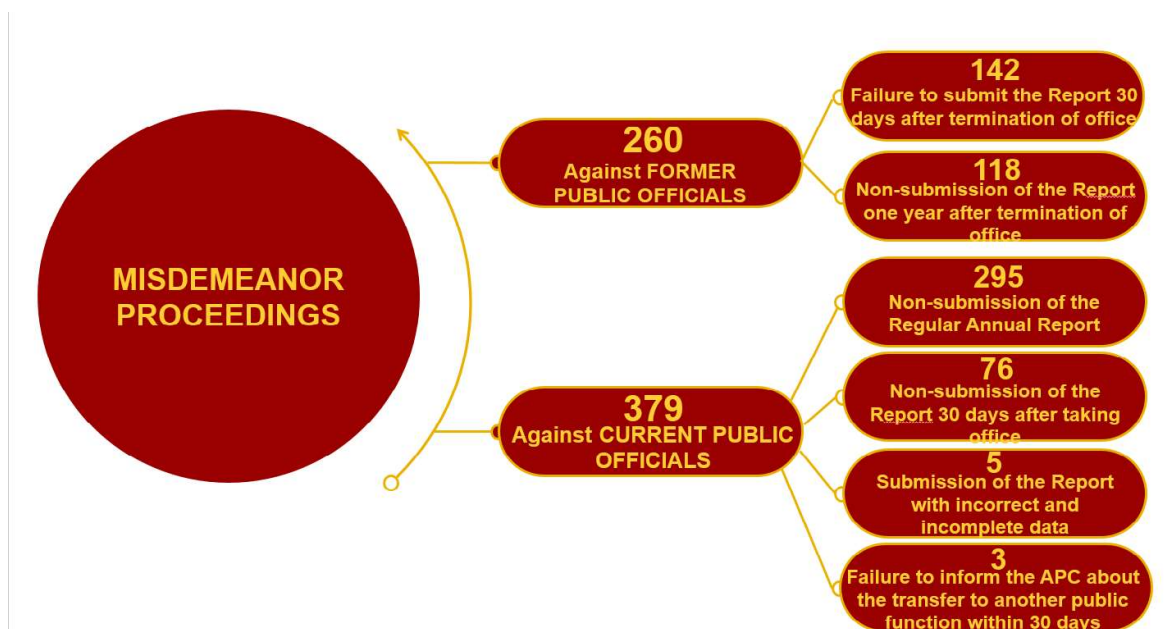


216 proceedings were completed (including cases from the previous period) and **in 95% of the Decisions (205) violations of the Law were found, which is significantly more compared to the same reporting periods of the previous three years of work of the APC.**

**The number of misdemeanor proceedings initiated in the first half of 2022 in this area is about 10% higher compared to the same reporting period in 2021, and significantly higher than the annual level of the previous years of APC work. This is due to the intensive work and proactive approach of the APC.**



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



**At the end of 2020, monitoring of the so-called lifestyle of public officials** was started, with the aim of checking the increase in the assets of public officials, using publicly available data, as well as information from the media, and comparing them with databases to which the APC has access, while adhering to the legal framework prescribed in Articles 23 and 30 of the LPC.

In this regard, the Agency submitted **one case to the Special State Prosecutor's Office in the second quarter of 2022.**

In order to effectively implement the legal provisions related to income and assets reports, the Agency has intensified its activities in the field of providing support to those obliged to submit reports, in order to become more familiar with legal obligations and remove potential ambiguities, especially in the context of the reporting process itself. In this sense, **the Agency informed the newly appointed public officials in the Capital of Cetinje, and the municipalities of Mojkovac, Petnjica, Berane and Ulcinj, as well as the officials of the 43rd Government of Montenegro and the General Secretariat of the Government about the obligations under the LPC. Also, APC created a manual for filling in reports on income and assets, while, in cooperation with UNDP, video training for filling out reports was created and published on the APC website.**

**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.

In the first quarter of 2022, local elections were held in Berane and Ulcinj, and the election campaign for local elections in Tivat began, while in the second quarter, previously announced local elections in a total of 10 municipalities were postponed to October 23, 2022 (Budva, Plužine, Žabljak, Bijelo Polje, Šavnik, Podgorica, Bar, Kolašin, Danilovgrad and Pljevlja). The fact that the obligations, prohibitions and restrictions prescribed by the LFPEEC were thus extended until the day of the election, as well as a month after the election, and that they are applied on the territory of the whole of Montenegro, meant that a **significant part of the personnel capacity of the APC was directed to the monitoring and control of the campaign.**

According to all the bases of the Agency's work in this area, in the first half of 2022, APC **carried out control of 20,491 reports submitted by entities subject to the LFPEEC on regular work and during election campaigns for already held local elections<sup>2</sup>, as well as for the elections scheduled for October 23**

**When it comes to the regular work of entities subject to the LFPEEC, a total of 151 reports / documents were submitted, of which 95 reports / notifications of political entities.<sup>3</sup>**

Categories of submitted reports/notifications	Number of submitted reports	Number of registered entities	Percentage of compliance with the obligation
Consolidated Annual Report for 2021	51	68	75%
Decisions on the amount of membership fee for 2022	50 <sup>4</sup>	63	88,9%

In the context of election campaigns, the Agency controlled a total of 20,340 reports and other supporting documentation:

- ✓ **121 by political entities**/electoral lists;
- ✓ **20,108** by authorities;

<sup>2</sup> In the first quarter of 2022, reports were submitted to the Agency during the election campaigns for the local elections held in Berane and Ulcinj, as well as for the elections that were then announced for the Municipality of Tivat. Also, in January, a part of the reports related to the election campaign for the December 2021 elections held in Mojkovac, Petnjica and Prijestonica Cetinje was submitted.

<sup>3</sup> The Agency, in accordance with its legal powers, supervises the implementation of the obligation of the Ministry of Finance and Social Welfare and the bodies of 25 local governments responsible for finance to, by January 31 at the latest, make a Decision on the amount of budget funds for financing the regular work of political entities and then publish it on its website within seven days of its adoption. In this regard, a total of 23 decisions on financing regular work, 23 decisions on financing the work of women's organizations, as well as 2 notifications were made.

<sup>4</sup> In 2021, six political entities submitted the Decision on the amount of membership fees for 2022.

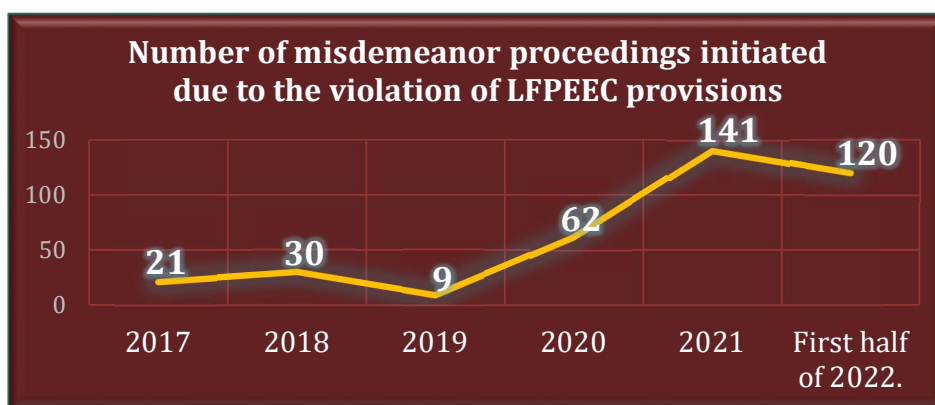


✓ **111** by media advertising service providers.

**Proactively, the Agency sent a total of 2.133 warnings** (2.101 to authorities and 32 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.**

**Also, 539 controls of compliance with prohibitions and restrictions during election campaigns were carried out.** In addition, **the control of 14 prescribed prohibitions was carried out, i.e. the verification and control of 2,199 persons who gave contributions to political entities.**

Despite the legal restrictions due to which it could not initiate misdemeanor proceedings in all cases of established irregularities, the Agency initiated **a total of 120 misdemeanor proceedings in the first half of 2022** due to violations of the LFPEEC, **significantly more compared to the annual levels from 2017 to 2020**, and slightly less than the total number of misdemeanor proceedings initiated during the whole of 2021.



In the reporting period, **3 complaints** were filed due to suspected violations of the Law and **3 proceedings were initiated**, which are ongoing.

#### **ADOPTION AND IMPLEMENTATION OF INTEGRITY PLANS**

In the first half of 2022, a total of **17 authorities issued a decision on the appointment of integrity managers for the first time.** Since the beginning of the year, **111 authorities have appointed a new person as integrity manager.** **The total number of authorities that appointed an integrity manager as of January 1, 2016 is 727 - 99.3%.**

Since the beginning of the year, **a total of 16 authorities have adopted their first integrity plan.** Since the beginning of the year, the integrity plan has been revised by 14 authorities. **A total of 723 authorities submitted an integrity plan to the Agency as of January 1, 2016 - 98.8%.**

Since the beginning of the year, **a total of 698 reports on the implementation of the integrity plan for the previous year have been submitted to the Agency.**

Due to the violation of the provisions of the LPC related to the obligation to submit the Report on the implementation of the integrity plan by April 15 of the current year for the previous year, the Agency submitted a total of **25 requests** to the competent misdemeanor courts in the second quarter of 2022 **for the initiation of misdemeanor proceedings**.

In the reporting period, six cases were completed according to requests (5 from 2021, 1 from 2022), of which sanctions were imposed in five - four fines in the total amount of €4,500 and one warning.

#### **METHODOLOGY FOR ASSESSING THE IMPLEMENTATION OF ANTI-CORRUPTION MEASURES**

Applying the **Methodology for assessing the implementation of anti-corruption measures**, which was prepared at the end of 2021 in cooperation with UNDP in Montenegro, in the first half of 2022, **individual reports on the assessment of the implementation of anti-corruption measures in the bodies that previously submitted documentation were prepared. Two sectoral reports were also prepared**, which also contain ranking lists of authorities in relation to their performance in the implementation of anti-corruption measures. Also, **the authorities are already working on fulfilling the recommendations contained in the aforementioned reports**.

The assessment indicated that it is necessary to strengthen internal controls, mechanisms for detecting and reporting corruption, ethical and professional behavior, i.e. raising employees' awareness of ethics and integrity, as well as human resources management. It is planned that the Methodology will also be implemented in authorities from the other eight sectors.

**The key findings of the project were presented at the "Integrity in Action" event.**

#### **CONTROL OF LOBBYING ACTIVITIES**

After the APC formed the **Commission for taking the exam for performing lobbying activities** in the 1st quarter, **two calls** for candidates to take the exam for performing lobbying activities were published and **two exams were organized**.

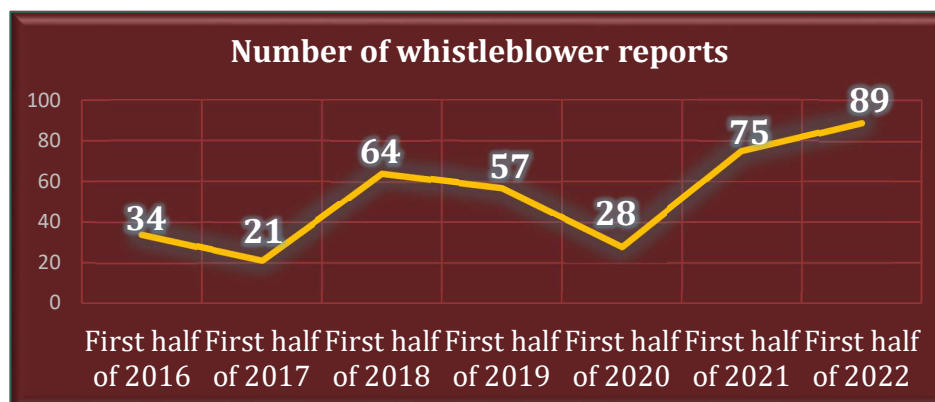
In the second quarter of 2022, **four certificates of passing the exam for performing lobbying activities were issued, while one natural person, after submitting a request, was entered in the register of lobbyists**.

**Six natural persons and one legal entity are currently registered in the register of lobbyists.**

The Ministry of Justice **continued to work on the Draft Law on Lobbying**, harmonizing it with the comments of the Secretariat for Legislation, the proposals of the APC Council and the Opinion on the Draft Law prepared by a Council of Europe expert. Also, a meeting of the **Working Group for the drafting of by-laws on lobbying** was held, which prepared drafts on the basis of which the proposals for the necessary by-laws will be further developed.

## PROCEDURE FOR WHISTLEBLOWER REPORTS AND PROTECTION OF WHISTLEBLOWERS

**In the first half of 2022**, the agency received **89 whistleblower reports - the most since the beginning of the work of the APC** at the level of the first six months of the year, which continues the trend of increasing the number of reports.



Of the total number of whistleblower reports, 43 were submitted anonymously.

In the first half of 2022, the Agency completed **19 procedures based on whistleblower reports**, in **4 of which the existence of threats to the public interest was determined** and the Agency gave **6 recommendations** to legal entities for improving transparency and eliminating corruption risks (1 was implemented, the deadline for implementation of 5 is due in the following period).

The Agency handed over **3 whistleblower reports** (proceedings in progress) to the **competent prosecutor's offices** for further processing, and **1 to another competent authority**.

Also, the APC initiated **7 ex officio proceedings** due to suspicion of endangering the public interest, which indicates the existence of corruption, and **continued work on 4 ex officio proceedings** from 2021. **4 procedures have been completed and in all of them it has been determined that the public interest is endangered**. On that occasion, the Agency made **6 recommendations** to the legal entity for improving transparency and eliminating corruption risks (two were not implemented, and in that sense the Agency acted in accordance with the powers arising from the provisions of Article 53 of the LPC).

In the first half of 2022, **3 requests for protection of whistleblowers were submitted to the Agency, and work continued on one procedure based on the request for protection from 2021.** One procedure was suspended due to the withdrawal of the request, in one the merits of the request were not determined, while the other two procedures are ongoing.

The agency is committed to harmonizing national legislation within its jurisdiction with international standards.

In this regard, the acting assistant director attended **the seventh meeting of the European Commission's expert group related to the implementation of Directive (EU) 2019/1937**, with the aim of further improving the legal framework for the purpose of more adequate protection of whistleblowers and creating preconditions for a more effective fight against corruption..

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

In the first half of 2022, the Agency has prepared:

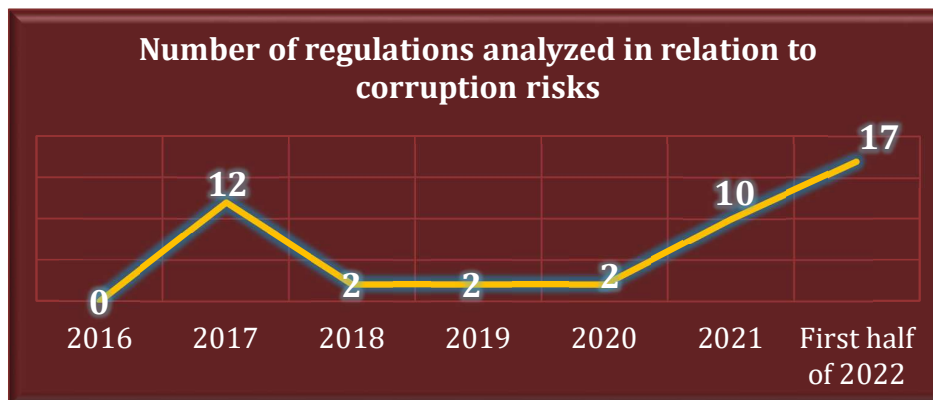
- ✓ **Analysis of regulations at the state administration level<sup>5</sup>** with the aim of improving solutions to prevent conflicts of interest, as a commitment from the Dynamic Plan of activities that lead to the fulfillment of temporary benchmarks in Chapter 23 - judiciary and fundamental rights. The analysis includes **9 laws and 5 other regulations<sup>6</sup>**, and resulted in guidelines, that is, recommendations for upgrading the legal framework that governs the policy of preventing conflicts of interest at the level of state administration;
- ✓ **Opinion on the Law on Health Care;**
- ✓ **Opinion on the Law on Montenegrin Citizenship;**
- ✓ **Opinion on the Rulebook on the professional exam for the bankruptcy administrator.**

Thus, **in the first six months of 2022, the Agency analyzed a total of 17 regulations, which is an increase of 70% compared to the whole of 2021 and more than in the previous four years combined.**

---

<sup>5</sup>[https://www.antikorupcija.me/media/documents/Analiza\\_propisa\\_na\\_nivou\\_dr%C5%BEavne\\_uprave\\_u\\_cilju\\_unapre%C4%91enja\\_rje%C5%A1enja\\_spr.pdf](https://www.antikorupcija.me/media/documents/Analiza_propisa_na_nivou_dr%C5%BEavne_uprave_u_cilju_unapre%C4%91enja_rje%C5%A1enja_spr.pdf)

<sup>6</sup> Labor Law, Law on Civil Servants and State Employees, Law on Public Procurement, Law on Internal Affairs, Law on Defense, Law on the Army of Montenegro, Customs Law, Law on Tax Administration, Law on Inspection Supervision, Code of Ethics of Civil Servants and State Employees, Rulebook on Records and Methodology of Risk Analysis in Performing Control over Public Procurement Procedures, Rulebook on Method of Conducting Simple Procurement, Code of Police Ethics, Decree on the List of Military Equipment and Products, Procedure and Manner of Conducting Public Procurement in the Field of Defense and Security



### **METHODOLOGY FOR CORRUPTION PROOFING OF LEGISLATION**

In cooperation with the United Nations Development Program (UNDP) in Montenegro, intensive work was done on the improvement of the **Methodology for the corruption proofing of legislation** with the aim of determining areas of risk for corruption, especially the part of the Methodology that refers to the list of risks, all with the aim of easier and more objective identification of future regulations that would be the subject of the Agency's analysis. **This resulted in the creation of an Analysis** that contains:

- **Comparative analysis** that includes the practice of 11 countries;
- **Analysis of the situation in Montenegro**, with recommendations for improving the situation in this area;
- Proposal of the **Preliminary Checklist on the risks of corruption**.

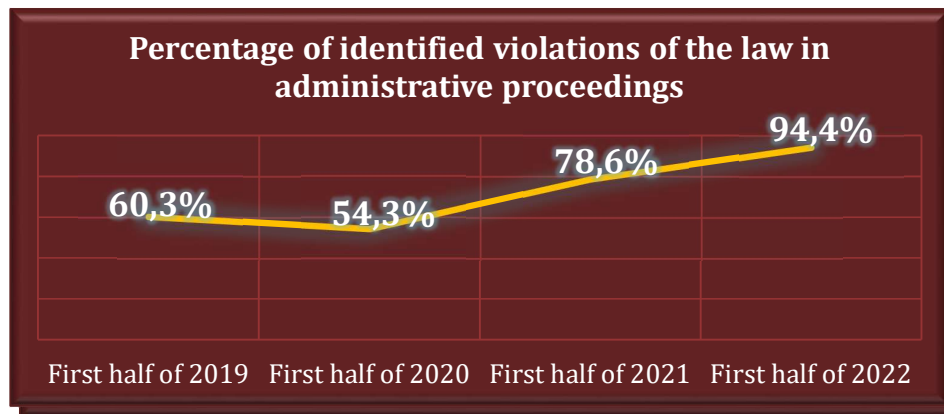
The methodology will be improved in accordance with the recommendations of UNDP experts.

Through **participation in the working groups**, the APC made a full contribution to the drafting of the Draft Law on Amendments to the Law on Lobbying, international restrictive measures, as well as on confiscation of proceeds of crime and property of illegal origin, and a set of media laws.

### **MANAGEMENT OF ADMINISTRATIVE PROCEDURES UNDER THE COMPETENCE OF APC**

The Agency continued its intensive work in the field of conducting administrative proceedings, so in the first half of 2022 it initiated 401 administrative proceedings against public officials (11 in the area of preventing conflicts of interest and respecting restrictions on the exercise of public functions and 390 in the area of income and assets verification).

Thus, in the first six months of 2022 alone, the APC initiated 16.2% more proceedings compared to the whole of 2021, and significantly more compared to the annual level of 2018, 2019 and 2020.



This is primarily due to the **greater number of initiated administrative proceedings in the area of income and assets verification**, which refer to **incorrect and incomplete data in the reports**.

A total of **232 proceedings were completed** (including cases from the previous period) and **violations of the Law were found in 219 proceedings** (94.4%).

**The percentage of identified violations of the law is significantly higher in the first half of 2022 compared to the same reporting periods of the previous three years of APC work.**

After the completion of the administrative procedures, the authorities submitted **7 responses** in the first half of 2022 in the area of prevention of conflicts of interest and restrictions on the performance of public functions, as well as in the area of income and assets verification:

- ✓ the term of office of 2 public officials has ended;
- ✓ in 4 cases, a disciplinary measure was issued - warning;
- ✓ in 1 it was stated that the public official resigned.

In the first half of 2022, the Administrative Court issued **41 judgments in proceedings for lawsuits against the Agency's acts**, by which

- ✓ 36 decisions were confirmed and rejected as unfounded;
- ✓ 3 Decisions were annulled and the case was returned for retrial;
- ✓ in 2 cases, the proceedings were suspended.

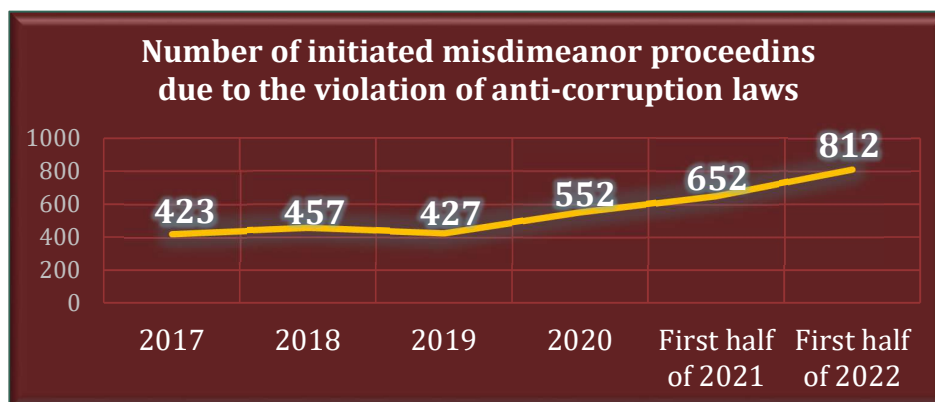
### INITIATION OF MISDEMEANOR PROCEEDINGS AND ISSUANCE OF MISDEMEANOR WARRANTS

In the first six months of 2022, due to violations of anti-corruption laws, the Agency submitted a total of **812 requests to the competent misdemeanor courts to initiate misdemeanor proceedings**:

- ✓ 692 for violating the LPC;
- ✓ 120 for violating the LFPEEC.

In that period, a total of **499 proceedings were completed** (including proceedings based on requests from previous years and executed misdemeanor warrants), of which **93% were sanctioned**. The total amount of fines is **€57,890**.

**The number of initiated misdemeanor proceedings in the first half of 2022 is higher by 24.5% compared to the same reporting period in 2021, and significantly higher compared to the annual levels of previous years of APC work.** This was primarily **generated by a greater number of misdemeanor proceedings initiated in the area of income and assets verification**, due to the more intensive work and proactive approach of the APC.



## EDUCATION AND PUBLIC RELATIONS

In the first half of 2022, the Agency **intensively implemented educational activities**, and in accordance with the adopted Annual Training Plan for entities subject to the law under the jurisdiction of the APC, **it organized as many as 21 trainings (more compared to the entire previous year), which were attended by 217 participants:**

- ✓ in five municipalities, trainings were held for newly appointed public officials who took office after local elections, on "Reporting of Income and Assets and Prevention of Conflicts of Interest";
- ✓ **one training** on "Reporting of income and assets " was held for public officials in the Administration for the Protection of Property and Legal Interests of the Capital City;
- ✓ **in six municipalities where local elections are planned**, trainings were held on "Control of funding of political entities and integrity of authorities in the election campaign";
- ✓ **two trainings on "Integrity in public administration and implementation of the integrity plan"** were organized in cooperation with the Human Resources Management Authority;
- ✓ **seven trainings were** held as part of the third cycle of the Education Program for the acquisition of key skills for performing the duties of an integrity manager, in cooperation with the Human Resources Management Authority.

Transparency has been strengthened through greater openness to the media, as evidenced by the fact that the **media image of the APC has been extremely favorable**. This is evidenced by the ratio of positively and negatively intoned media publications,

which is key to creating an image - **there were 2,5 times more positively intoned publications in the first half of the year.** The fact that the number of positively intoned announcements in the first half of 2022 is higher than in the entire year of 2018 and 2019 also testifies to the significant improvement of the media image of the Agency.

## COOPERATION WITH STATE INSTITUTIONS AND THE CIVIL SECTOR

In the spirit of deepening inter-institutional cooperation and strengthening the systemic response to corruption, the Agency achieved **intensive cooperation with state institutions**, and in this sense **several meetings were held with the highest representatives of the executive and legislative authorities** - Minister without Portfolio **Zoran Miljanić**, Minister of Justice **Marko Kovac**, Minister of Public Administration **Maraš Dukaj**, Minister of Foreign Affairs **Ranko Krivokapić**, President of the Parliament of Montenegro **Danijela Đurović** and State Secretary in the Ministry of Capital Investments **Admir Šahmanović**.

In order to **further develop cooperation with the civil sector**, representatives of the Agency met with representatives of NGOs Center for Civil Liberties (CEGAS) and Center for Monitoring and Research (CeMI). On that occasion, the interlocutors were informed about the activities that the APC undertakes and will undertake in the



**control and supervision of election campaigns for the upcoming local elections.** Also, in accordance with the conclusion of the Council of the Agency from the 66th session, consultations were started with the NGO sector on the topic of **improving the APC reporting form.**

## INTERNATIONAL COOPERATION

The presented results of the work are also a consequence of the implementation of all methodologies, projects and expert knowledge that the Agency has continuously received from international partners.



Within the framework of international cooperation, the Agency continued with the **continuous strengthening of institutional capacities and improvement of work.**

With the support of the Council of Europe, **the first of the planned three phases of the LPC analysis** was carried out, which resulted in the creation of a **Technical Document**, in which the analysis, conclusions and recommendations related to the parts of the LPC governing the establishment and operation of the Agency were presented. The document states that the Law includes numerous progressive provisions that protect the position of the APC, **but still leaves some room for inappropriate external pressure and political interference in the work of the Agency.** In that part, it is emphasized that the legal provisions prevented attempts to reduce the legally defined budget of the Agency, but that the LPC could not ensure the full realization of the right to independent disposal of the budget. In addition, the Agency's independence and effectiveness could be limited due to the absence of clear and specific legal provisions regarding its competences, personnel management, appointment and dismissal of senior managers, appeals procedures and punishment policy. Due to all of the above, the document describes a series of recommendations for improving the legal framework that would prevent inappropriate pressures and interference, but also enable more effective, independent and efficient work of the Agency.

**The remaining two phases of the analysis of the Law will be completed by the end of the year, after which it will be decided whether to proceed with the drafting of a new law or amendments to the existing one.**

As part of the II phase of the Horizontal Facility Program (Council of Europe and the EU), active work was also done on the creation of **the APC Communication Strategy**, with the aim of improving communication and cooperation with the domestic and international public.

- ✓ Within the support of UNDP in Montenegro:
- ✓ The **APC Strategic Plan (2022-2024)** was adopted;
- ✓ Implementation of the **Methodology for evaluating anti-corruption instruments in government bodies continued;**
- ✓ work was done on improving the **Methodology for corruption proofing of legislation.**

**With the support of the US Embassy in Montenegro,** activities continued in terms of harmonizing the Agency's internal procedures with **ISO 9001 standards.**

In the reporting period, the Agency, as the national coordinator of the obligations arising from the signing of the United Nations Convention against Corruption (UNCAC) by Montenegro, coordinated and organized the **visit of representatives of the Secretariat of the Office on Drugs and Crime (UNODC) and competent evaluators (representatives of Iraq and Estonia) in combined format.** The working visit was one of a series of steps in the evaluation of Montenegro in the application of UNCAC, the only legally binding universal anti-corruption instrument. In this second cycle of evaluation, the application of chapters II - Preventive measures, and V – Asset Recovery was under scrutiny. The next step will be the preparation of the final Report for Montenegro, which will show whether and to what extent our country fulfills the articles of the Convention in the mentioned chapters with its legislation and practice.

During the second quarter, **representatives of the Agency** (which has the role of national coordinator for fulfilling all obligations arising from Montenegro's membership in the Group of States against Corruption of the Council of Europe - GRECO) participated in the **91st plenary meeting of GRECO in Strasbourg**, where the **evaluation report for Montenegro** "Prevention of corruption in relation to the highest levels of executive power and the police" was discussed. On that occasion, recommendations were listed that our country should fulfill in the next 18 months in order to improve the institutional and legislative framework and practice in these areas.

