



REPUBLIKA E KOSOVËS
REPUBLIKA KOSOVA | REPUBLIC OF KOSOVO
AGJENCIA PËR PARANDALIMIN E KORRUPSIONIT
AGENCIJA ZA SPREČAVANJE KORUPCIJE
AGENCY FOR PREVENTION OF CORRUPTION



ANNUAL REPORT

JANUARY – DECEMBER 2023

March 2024

AGENCY FOR THE PREVENTION OF CORRUPTION (APC)

ANNUAL REPORT

JANUARY – DECEMBER 2023

The Agency for the Prevention of Corruption (APC), as an independent and specialized body for the implementation of state policies for the prevention of corruption in Kosovo, presents the Annual Work Report for the period January 1-December 31, 2023 in the Assembly of the Republic of Kosovo, respectively in the Parliamentary Committee for Legislation, Mandates and Supervision of the Anti-Corruption Agency, as defined by Article 15 of the Law on the Agency for the Prevention of Corruption.

The Annual Report of the Agency covers the period of January 1 until December 31, 2023, and chronologically presents the implementation of the activities based on the 2023 performance plan, comparisons to previous years, and reviews of the corruption prevention activities related to the implementation of the legal framework against corruption.

| | |
|--|-----------|
| TABLE OF CONTENTS | |
| EXECUTIVE SUMMARY | 5 |
| LIST OF ACRONYMS | 6 |
| GENERAL DESCRIPTION OF THE AGENCY, LEGAL FRAMEWORK AND INTERNAL ORGANIZATION, BUDGET, PERSONNEL AND PROCUREMENT | 7 |
| LEGAL FRAMEWORK | 7 |
| INTERNAL ORGANIZATION | 8 |
| BUDGET | 9 |
| ADDRESSING THE RECOMMENDATIONS OF THE NATIONAL AUDIT OFFICE (NAO) | 11 |
| PERSONNEL | 12 |
| PROCUREMENT | 12 |
| INFORMATION TECHNOLOGY MANAGEMENT, ONLINE SERVICES AND INFORMATION TECHNOLOGY | 12 |
| STATISTICAL DATA ON THE STATE OF THE PREVENTION OF CORRUPTION RELATED TO THE COMPETENCES OF THE AGENCY | 13 |
| DECLARATION AND CONTROL OF ASSETS | 15 |
| PREVENTION OF CORRUPTION IN PUBLIC PROCUREMENT | 16 |
| ADDRESSING CASES OF WHISTLE-BLOWING | 17 |
| IMPLEMENTATION OF LEGISLATION AGAINST CORRUPTION, ITS SUPPLEMENTATION AND AMENDMENT | 18 |
| CASE REPRESENTATION IN COURTS | 22 |
| DECLARATION AND CONTROL OF ASSETS OF SENIOR PUBLIC OFFICIALS | 23 |
| DECLARATION, BY TYPE | 24 |
| CONTROL OF ASSETS DECLARATION | 26 |
| ACCEPTANCE OF GIFTS IN CONNECTION WITH PERFORMANCE OF OFFICIAL DUTIES | 27 |
| PREVENTION OF CONFLICT OF INTEREST IN THE EXERCISE OF PUBLIC FUNCTIONS | 29 |
| PREVENTION OF CORRUPTION IN PUBLIC PROCUREMENT AND MONITORING | 35 |
| RISK ASSESSMENT AND LEGAL ACTS AGAINST CORRUPTION | 36 |
| INTEGRITY PLANS | 37 |
| COOPERATION WITH LOCAL INSTITUTIONS | 37 |
| REGIONAL COOPERATION | 40 |
| MEDIA ACTIVITIES | 41 |
| PUBLIC AWARENESS-RAISING ACTIVITIES | 42 |
| REQUESTS FOR ACCESS TO PUBLIC INFORMATION | 43 |
| REPORT WITH RESPECT TO THE HANDLING OF CASES OF EXTERNAL WHISTLEBLOWING | 43 |

| | |
|---|----|
| ANNUAL REPORTS FROM PUBLIC INSTITUTIONS, PRIVATE ENTITIES, AND REGULATORS REGARDING WHISTLEBLOWING, JANUARY 1 - DECEMBER 31, 2023 | 46 |
| PUBLICATION OF THE NAME OF THE OFFICER RESPONSIBLE FOR RECEIVING AND HANDLING CASES OF WHISTLEBLOWING | 47 |
| LESSONS LEARNED AND FUTURE PRIORITIES | 47 |
| ANNEX NO. 1. OLD ORGANIGRAM OF THE AGENCY FOR PREVENTION OF CORRUPTION (APC)..... | 50 |
| ANNEX NO. 3. LIST OF PARTICIPATION IN TRAININGS, FORUMS, SEMINARS DURING 2022..... | 52 |

EXECUTIVE SUMMARY

The annual report of the Agency for the Prevention of Corruption for 2023 summarizes the efforts and achievements in the fight against corruption in all its fields of activity. The following are some of the key points of the report:

Focus on the Prevention of Corruption: The Agency has focused its work and activities on the prevention of corruption and conflict of interest. This includes the protection of whistle-blowers, organizing the asset and gift declaration process, as well as the prevention of corruption in public procurement.

Addressing Requests and Information: The Agency has continuously addressed the requests and information submitted by the public institutions, anonymous reports, as well as requests from the media and civil society.

Assistance and Expertise for Institutions: The Agency has provided professional support and expertise in the drafting of international rules on the prevention of corruption according to the requests and needs of public institutions, mainly related to integrity plans and ethical issues.

Overview of the Agency's Work: The report contains a general overview of the work performed during 2023, including training activities and programmes to raise awareness about the prevention of corruption, including the production of visual products and receiving and addressing over 11,000 asset declaration registers.

Reforms in Legislation and Implementation: The report describes the reforms in legislation and their implementation, which have led to the strengthening of internal operation procedures and the prevention of corruption and control, including the drafting and approval of sub-legal acts.

International Cooperation: Addressing international and regional cooperation, including meetings, conferences, trainings, and exchange of information with other international organizations and institutions.

Challenges and Future Priorities: The report identifies the challenges faced by the Agency in 2023, and presents future plans and priorities in the fight against corruption.

These points present a general overview of the efforts of the Agency for the Prevention of Corruption during 2023 and challenges for the future in this field.

LIST OF ACRONYMS

APC Agency for the Prevention of Corruption
KBRA Kosovo Business Registration Agency
CRA Civil Registration Agency
CC Constitutional Court
BC Basic Court
KIPA Kosovo Institute for Public Administration
KPI Kosovo Police Inspectorate
KEC Kosovo Energy Corporation
KJC Kosovo Judicial Council
KPC Kosovo Prosecutorial Council
KCPC Kosovo Criminal Procedure Code
CEC Central Election Commission
PPRC Public Procurement Regulatory Commission
LDC Leadership and Development Consultancy
MPA Ministry of Public Administration
MEST Ministry of Education, Science and Technology
MoJ Ministry of Justice
MDA Management Development Association
MFT Ministry of Finance and Transfers
MKSF Ministry of Kosovo Security Forces
MESP Ministry of Environment and Spatial Planning
MIA Ministry of Internal Affairs
MoH Ministry of Health
MTI Ministry of Trade and Industry
PEMU Policy and Public Enterprise Monitoring Unit
EO Economic Operator
OSCE Organization for Security and Co-operation in Europe
PRB Procurement Review Body
SPRK Special Procurement of the Republic of Kosovo
SPO State Prosecutor's Office BP Basic Prosecution
KCPSD Kosovo Centre for Public Safety Education and Development
RAI Regional Anti- Corruption Initiative
SAP Agency's Strategy and Action Plan against Corruption
TI - Transparency International
UNDP - United Nations Development Program
UP – University of Prishtina "Hasan Prishtina"
OPM Office of the Prime Minister

GENERAL DESCRIPTION OF THE AGENCY, LEGAL FRAMEWORK AND INTERNAL ORGANIZATION, BUDGET, PERSONNEL AND PROCUREMENT

LEGAL FRAMEWORK

The approval and entry into force of Law No. 08/L-017 on Agency for the Prevention of Corruption changed the mandate of the Agency and its competences and responsibilities are expanded at the same time, to include: the monitoring of the implementation of integrity plans, corruption risk assessment, as well as assessment of legal acts against corruption, the implementation of which entered into force six (6) months after the entry force of the law.

Law No. 08/L-017 on Agency for the Prevention of Corruption regulates the status, organization and competences of the Agency for the Prevention of Corruption as in the following:

- Implementation of the Law on Prevention of Conflict of Interest in Exercising a Public Function, Law on Declaration, Origin and Control of Assets and Gifts, and Law on Protection of Whistle-blowers, including the surveillance and prevention of cases of conflict of interest and undertaking the measures provided by the special law; monitoring asset declaration; and monitoring gifts received in relation to the performance of official duty and undertaking the measures provided by law;
- Providing opinions related to conflict of interest and monitoring gifts related to the performance of official duty;
- Monitoring and undertaking the necessary measures for the protection of whistle-blowers.
- Undertaking actions in the field of monitoring the action plan of the national strategy against corruption, assessment of legal acts against corruption, corruption risk assessment, and integrity plan assessment which includes:
 - Providing professional and technical assistance, advice and support of initiatives intended to be undertaken by the institutions for the prevention of corruption;
 - Provide recommendations to the Assembly of the Republic of Kosovo and the Government of the Republic of Kosovo on the evaluation of draft laws related to the prevention of corruption when this is required by those institutions or upon the decision of the Director of the Agency;
- Monitoring the implementation of the Strategy against Corruption and its action plan;
- Cooperating with state institutions and civil society to raise public awareness about the prevention of corruption;
- Developing and monitoring corruption risk assessment and providing opinions related to legal acts for the purpose of aligning with international standards against corruption;
- Monitoring the implementation of integrity plans of public institutions;
- Performing administrative investigations and undertaking actions in cases falling under the competences of the Agency; Referring criminal reports to the state prosecutor's office or, in the event of administrative violations, submitting the case to the competent administrative body.
- Initiate minor offence procedures from its scope in accordance with the relevant legislation in force and imposing fines and undertaking other measures in accordance with the legislation in force.

Whereas, with the approval and entry into force of Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, the amendments that have been reflected in the process of asset declaration are related to the expansion of the list of declaring entities, including new categories which the law has

obliged to perform asset declaration such as: licenced physicians exercising their activity in public institutions (secondary and tertiary level), professors of public universities, custom officials, etc., which the obliges to undergo asset declaration one (1) year after the entry into force of Law No. 08/L-108. The imposition of fines by the Agency against declaring entities, institutional contact officials, in the event of failing to fulfil their legal obligations on time in terms of asset declaration is also one of the amendments of Law No. 08/L-108, as well as asset declaration through the online system.

Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts regulates the process, methods and procedures of declaration of assets and gifts, origin and control of assets and gifts, increasing the integrity of public officials/declaring entities for the purpose of preventing corruption, conflict of interest, as well as empowering integrity in public institutions, including sanctions.

INTERNAL ORGANIZATION

The Agency's internal organization during 2023 functioned according to Regulation No. 01/2013 on internal organization and systematization of jobs in the Anti-Corruption Agency and Regulation No. 01/2019 amending and supplementing Regulation No. 01/2013 on internal organization and systematization of jobs in the Anti-Corruption Agency, regardless of the fact that with the approval of the new legal framework, the Agency's mandate and responsibilities have changed, starting from the title of the Agency itself. In 2023, the Agency for the Prevention of Corruption operated with 41 employees/officials according to the organizational structure Regulation No. 01/2013 with its supplementation/amendments, in departments, divisions and offices.

- The Department for the Fight of Corruption which, with the entry into force of Law No. 08/L-017 on Agency for the Prevention of Corruption, has acted in compliance with the new legal amendments, according to the authorization of the Director of the Agency, until the re-organization of the Agency according to its new legal mandate, has continued to process cases of preliminary investigations, and undertake other actions in analysing statistical data and other data about the state of corruption in Kosovo, drafting and monitoring the implementation of the Strategy and Action Plan against Corruption, protecting whistle-blowers according to the Law on Protection of Whistle-blowers as well as reporting on the implementation of the duties of the Agency defined by other strategic documents. Further, this Department has engaged in performing tasks related to the new mandate of the Agency in terms of: Developing Methodologies for Monitoring the implementation of integrity plans, conducting corruption risk assessment and assessing legal acts against corruption, as well as the role of the Agency in drafting integrity plans by the responsible authorities. This Department consists of: 1. Division of Investigations and Analyses, 2. Division of Investigations and Strategies, and 3. Division of Whistle-blower Protection.
- Department for Prevention of Corruption is responsible for monitoring assets, monitoring gifts and preventing corruption in public procurement and corruption in general. This Department consists of: 1. Division for the Declaration of Assets and Gifts, and 2. Division for the Prevention of Corruption in Public Procurement.
- Department for Prevention of Conflict of Interest which is responsible for the prevention of conflict interest of senior public officials while exercising public functions, cooperates with the responsible authorities, conducts analyses and addresses cases of conflict of interest, receives annual reports form the responsible authorities, provides professional assistance and advice to other institutions in the field of prevention of conflict of interest. This Department consists of: 1.

Division for Prevention of Conflict of Interest for Senior Officials and Responsible Authorities, and 2. Division for Prevention of Conflict of Interest for Responsible Authorities and Official Persons.

- Department of Finance and General Work which is responsible for the management and maintenance of material resources, providing administrative services, managing finances and the budget as well as logistics of the Agency. This Department consists of the Division for General Services, Budget and Finance.
- Office for Professional Support and Cooperation is responsible for providing professional legal support, managing and administering online data of the Agency and the IT system, providing cooperation and support in various technical-administrative issues, and archiving official documents.
- Coordinator of the Public Communications Office is responsible for organizing, coordinating, leading and coordinating activities related to public and media information pertinent to the work and activities of the Agency.
- The Personnel Manager and Procurement Manager are responsible for recruitment procedures and managing some procurement activities. This organization was changed with the entry into force of the new Regulation on internal organization and systematization of jobs in the Agency.

(Annexes 1 and 2: Organizational Chart of the Agency)

BUDGET

The agency is an independent and specialized institution for the implementation of state policies for the prevention of corruption in Kosovo, which is financed from the budget of the Republic of Kosovo. According to the Law on the Agency: APC draws up the annual budget in compliance with the Law on Public Financial Management, and independently decides on the use of the budget, in accordance with the relevant legislation in force.

The budget of the Agency for 2023 was in the amount of 557,843.91€, whereas after the final budget review process, it was 656,407.18€. Other funds were planned and managed according to the legal obligations set by the Law on Public Financial Management and the requests for funds according to the economic categories. The allocated funds were used to meet the actual needs of the institution. The following table presents the initial budget approved with the Law on Budget, by economic categories, final budget, and expenditures expressed in % of execution.

| | Economic categories | Approved (initial) budget | Final budget Post-review | Total expenditures | % of execution based on final budget |
|----------|--------------------------------|----------------------------------|---------------------------------|---------------------------|---|
| No. | | a | b | c | d=(c÷b) |
| 1 | Salaries and Allowances | 415,287.91 | 513,851.18 | 513,851.18 | 100% |

| | | | | | |
|---|-------------------------------------|-------------------|-------------------|-------------------|--------------|
| 2 | Goods and Services | 114,056.00 | 114,056.00 | 101,110.04 | 88.65% |
| 3 | Utilities | 8,500.00 | 8,500.00 | 2,703.01 | 31.8% |
| 4 | Non-Financial Capital Assets | 20,000.00 | 20,000.00 | 6,677.00 | 33.4% |
| 5 | Receipts - Revenues | - | - | - | |
| | Total | 557.843.91 | 656,407.18 | 624,341.23 | 95.1% |

The allocation of funds is based on planning according to the Cash Flow Plan, prepared by the Department of Finance and General Services in cooperation with the Procurement Officer and the Director of the Agency. The budget approved according to the budget law has met the planned needs of the Agency in the implementation of all financial obligations. From the final budget of €656,407.18, for all categories, a total amount of €624,341.23 was spent, or expressed in percentage, 95.1%.

Salaries and Allowances – The initial allocations in the category of Salaries and Allowances were 415,287.91 €, whereas in the final budget 513,851.18, while 513.851.18 € or 100% have been spent. The difference between the initial and the final budget was a result of the entry into force of the Law on Salaries and the financial implications of this law. The Agency made calculations and informed MFLT on time, respectively the Budget Department, about the lack of funds in the Category of Salaries and Allowances. The difference between the initial and the final budget in the category of Salaries and Allowances was 98,563.27€.

Goods and Services – The budget allocated in the category of Goods and Services was 114,056.00€. There are no differences between the final and the initial budget here, whereas 101,110.04 € have been spent, with the percentage of budget execution being 88.6%. All expenditures in the category of Goods and Services have covered the needs for supplies and different services of the Agency. The Agency responded to the request of MFLT to record the potential savings, and has reported 6,000.00€ as savings, however this was not reflected in the final budget.

Utilities – The budget allocated in the category of Utilities was 8,500.00€, whereas 2,703.01€, or 31.8%, have been spent. In this category, the Agency made the payment for landline telephone services, as the liabilities emerging from this category are covered by MIA.

APC responded to the request of MFLT to record savings in the category of Utilities, and declared an amount of 5,500.00€ as free funds, however this was not reflected in the final budget.

Capital investments – In 2023, the Agency had planned three capital projects and the allocated budget in the category of Capital Investments for 2023 was 20,000.00€, whereas the spent budget was 6,677.00€, or 33,4%.

-Purchase of information technology equipment in the server room – A project transferred from last year, while a part of it was implemented in 2023.

-Purchase of computers/laptops – the funds allocated for this project were in the amount of 4,000.00€, whereas 3,992.00€ have been spent by this project.

-Creating and designing APC website – the funds allocated for this project were in the amount of 6,000.00€, whereas 1,920.00€ have been spent by this project.

APC responded to the request of MFLT to record savings in the category of Capital Investments, and declared an amount of 9,150.00€, however this was not reflected in the final budget.

Revenues - during 2023, there were no **Receipts/Revenues**.

The following table presents the budgetary allocations by economic categories and expenditures in the last two years.

| No. | Economic categories | Final budget for 2023 | Expenditures 2023 | Final budget for 2022 | Expenditures 2022 | Final budget for 2021 | Expenditures 2021 |
|-----|-------------------------------------|-----------------------|-------------------|-----------------------|-------------------|-----------------------|-------------------|
| | | a | B | c | d | e | f |
| 1 | Salaries and Allowances | 513,851.18 | 513,851.18 | 413,222.00 | 413,201.12 | 389,901.46 | 389,901.46 |
| 2 | Goods and Services | 114,056.00 | 101,110.04 | 114,056.00 | 112,242.13 | 39,617.83 | 39,454.66 |
| 3 | Utilities | 8,500.00 | 2,703.01 | 3,500.00 | 3,196.47 | 2,320.96 | 2,320.96 |
| 4 | Non-financial/capital assets | 20,000.00 | 6,677.00 | 8,216.00 | 7,273.92 | - | - |
| | Total | 656,407.18 | 624,341.23 | 538,994.00 | 535,913.64 | 431,840.25 | 431,677.08 |

ADDRESSING THE RECOMMENDATIONS OF THE NATIONAL AUDIT OFFICE (NAO)

In the financial inspection for 2022, the general evaluation for the financial statements in all the material aspects had a fair and real presentation. The Audit Report for APC AFS did not produce any recommendations, whereas in 2023 the audit process by NAO is ongoing and we have not received the audit report yet.

PERSONNEL

The Agency has 43 officials, of which 2 are on paid leave, suspended positions according to Law No. 08/L-179 on Public Officials. Within the recruitment plan, recruitment procedures have been developed and the Senior Official for Monitoring the Declaration of Assets and Gifts (definite term) has been selected. Based on the duties and responsibilities of human resources management, the professional capacity building plan for the officials of the Agency has been implemented and monitored. The Personnel Unit has managed all systems that are directly related to the responsibilities of the HRMU, such as the Human Resources Management System <https://hrmis.rks-gov.net/>, Register system <http://smvp.rks-gov.net/>, the Archive system <https://smaed-online.rks-gov.net/>, and the Salary Management System.

Further, in accordance with Regulation No. 08/2023 on Allowances for Public Sector Employees, based on Law No. 08/L-196 on Salaries in the Public Sector, Law No. 08/L-017 on Agency for the Prevention of Corruption, the Agency has classified the positions according to Regulation No. 10/2022 on Classification of Jobs in Civil Service and, consequently, the Internal Regulation on Organization and Systematization of Jobs has also been developed.

(Annex No. 3, List of participants in trainings, for a, seminars within and outside the country during 2023)

PROCUREMENT

Based on the 2023 Procurement Plan, of 23 planned procurement activities, 18 have been implemented, while 5 were not initiated or were cancelled due to complaints, whereas within the procurement activities, requests have been filed with CPA to implement the procurement activities, purchase orders have been submitted to KFMIS and contract management has been initiated.

INFORMATION TECHNOLOGY MANAGEMENT, ONLINE SERVICES AND INFORMATION TECHNOLOGY

In the reporting period January-December 2023, there has been a rapid development in the digital transformation of the Agency. The project of transforming the method of asset declaration from manual to electronic was implemented by the end of February 2023. In early March 2023, the online platform, Data Management System of the Agency (DMSA) was launched for the first time. At that time, the application for the registration of declaring entities by the institutional contact officials "Contact Points" <https://pikatekontaktit.rks-gov.net> was launched, which enables the declaring entities in institutions to register/cancel their registration. At the same time, the online application for the declaration of assets <https://e-deklarimi.rks-gov.net> was launched, which allow the declaring entities to declare their assets online. Both of these applications have become an integral part of the DMSA system. Implementation and operationalization of these two applications has led to a completely digital and dynamic process of creating the lists of declaring entities, and has helped to transform the asset declaration process into electronic/online declaration. These two modules of the DMSA system were connected through the national inter-operability platform – GG (Government Gateway) with the database of the Civil Registration Agency, in order to use accurate personal data (first name, parent's name, last name, date of birth, gender, residence, marital status, etc.) of the declaring entities through the personal identification number. In the second half of 2023, the case management application DMSA-CMS was also launched,

which transformed selection of declaring entities for the complete asset control into a digital process, as well as the entire verification process of asset declarations.

This year, we generated over 10,000 registers of declarations in pdf format through the “e-declaration” online declaration system, which were published on the official website of the Agency <https://apk-rks.net/index.php/regjistrat/>.

The following chart shows the number of information technology projects implemented, applications as well as online services of the Agency for the years 2021, 2022 and 2023.

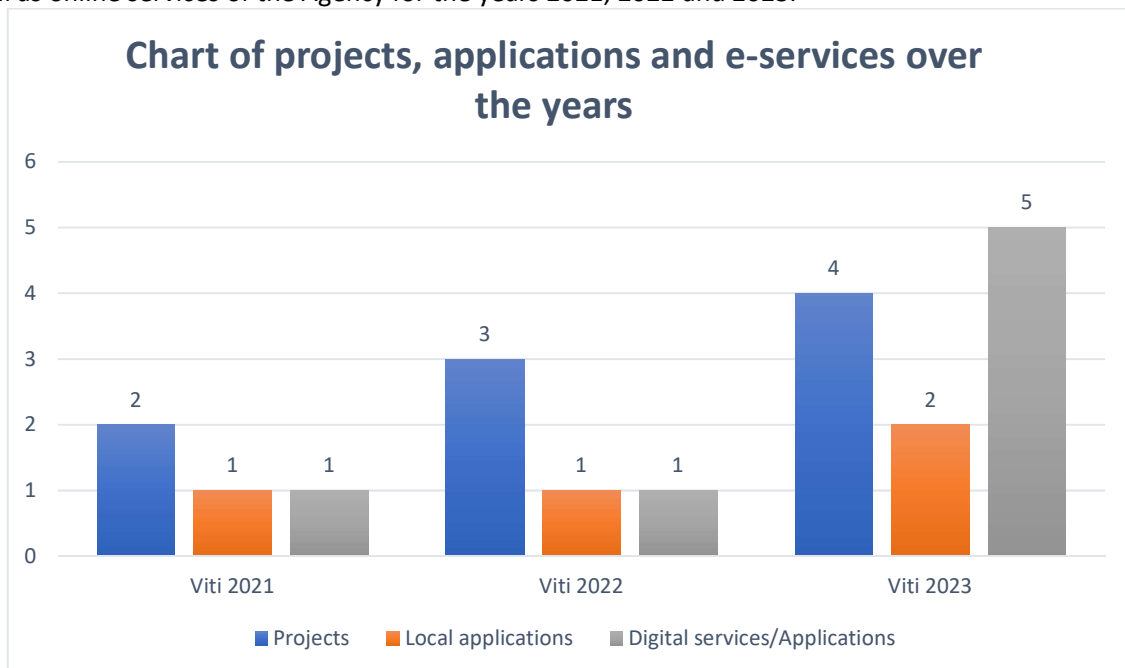


Chart 1. Graphic presentation of IT projects, applications and e-services for the period 2021-2023

In addition to the successful implementation of the new e-services of the Agency, which are part of the DMSA online system, despite the limited IT staff, the entire computer network and associated equipment was managed and administered during the reporting year, including servers, routers, switches, etc. Further, the database with the application of older declarations of the Agency, SDRP (asset declaration and registration system), where declarations spanning the period from 2011 to 2022 are registered, was maintained and was operational.

During the reporting year, several other IT projects were implemented and completed, such as the purchase of new computers for the staff of the Agency, purchase of new IT equipment, such as projector, hologram, etc., and design and branding product project according to the new title of the Agency. A few other projects were initiated or are ongoing, such as the development of the online corruption reporting platform “For Kosovo Without Corruption”, re-designing of the website of the Agency, which is now hosted and in use at <https://apk-rks.net/>, the open data project for the declaration registers, etc.

STATISTICAL DATA ON THE STATE OF THE PREVENTION OF CORRUPTION RELATED TO THE COMPETENCES OF THE AGENCY

Of the total number of cases received by the Agency, presented chronologically in the annual work report, the statistics and analyses of cases addressed by the Agency show that, compared to the previous years,

work results are obvious and there has been a continuous increase in the number of requests and cases addressed by the Agency in the field of prevention and fight against corruption, based on the competences of the Agency for the prevention of conflict of interest, accuracy of asset reporting, prevention of corruption in public procurement and whistleblowing cases.

Within the administrative procedure of the preliminary investigations, the Agency addressed a total of 66 cases, of which 59 were submitted to the Prosecutor's Office for further processing, and 7 cases have been concluded. In 2023, 65 cases were carried over from 2022, whereas in 2022, 152 cases were carried over from 2021.

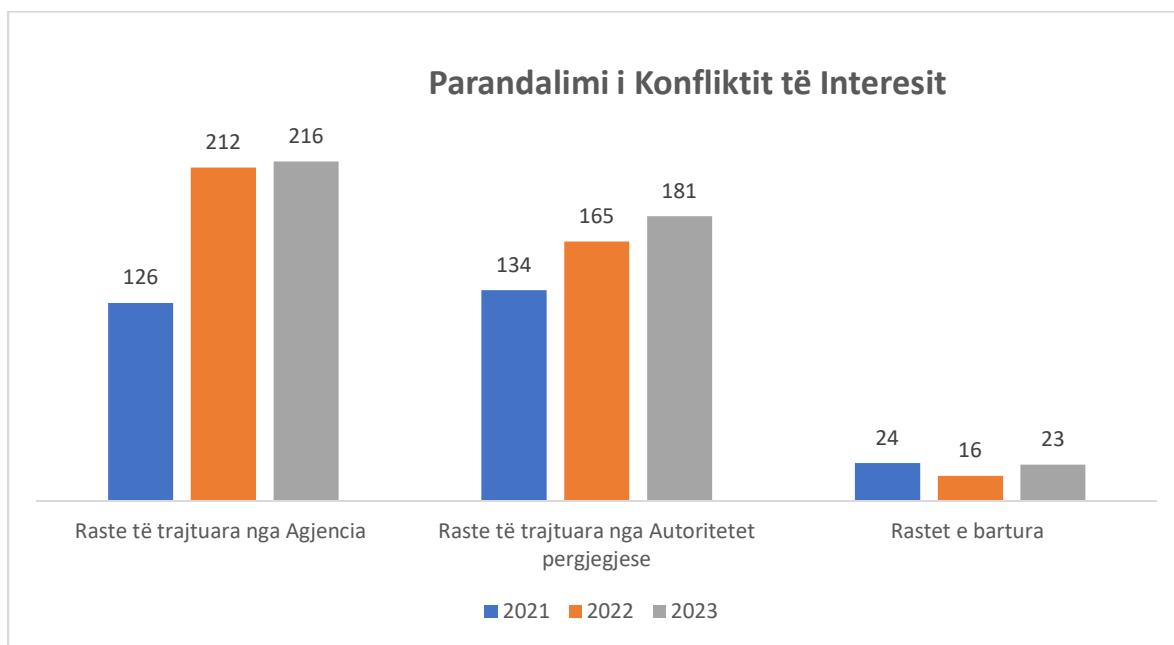
Comparison with the previous years in terms of the number of addressed cases in preliminary investigations procedure is not possible because the role of the Agency for developing the preliminary investigations procedure, where a person suspecting of corruption may report the given case to the Agency, has been terminated with the legal amendments, namely the entry into force of Law. No. 08/L-017 on Agency for the Prevention of Corruption, and the cases being addressed under this procedure are cases that were carried over from the previous year, which the APC was obliged to process according to the mandate at the time when the case was initiated.

ADDRESSING CASES FOR THE PREVENTION OF CONFLICT OF INTEREST

Special focus in the mission of the Agency is the prevention of conflict of interest in exercising a public function. This is done after addressing cases, by issuing decisions, opinions, recommendations, advice to institutions, public officials, when potential situations of conflict of interest arise. In the reporting period January-December 2023, the Agency addressed a total of 216 cases.

Of the total number, 98 cases were addressed with requests filed by natural or legal persons, 54 of them ex officio, 8 were addressed after media reports, 2 from non-governmental organizations, and 54 cases were addressed with the information received in the form of external reports.

Compared to the previous years, respectively the last three years, we can see that in 2021 there were 105 cases, in 2022 there were 233 cases, whereas in 2023 there was a total of 214 cases reported.

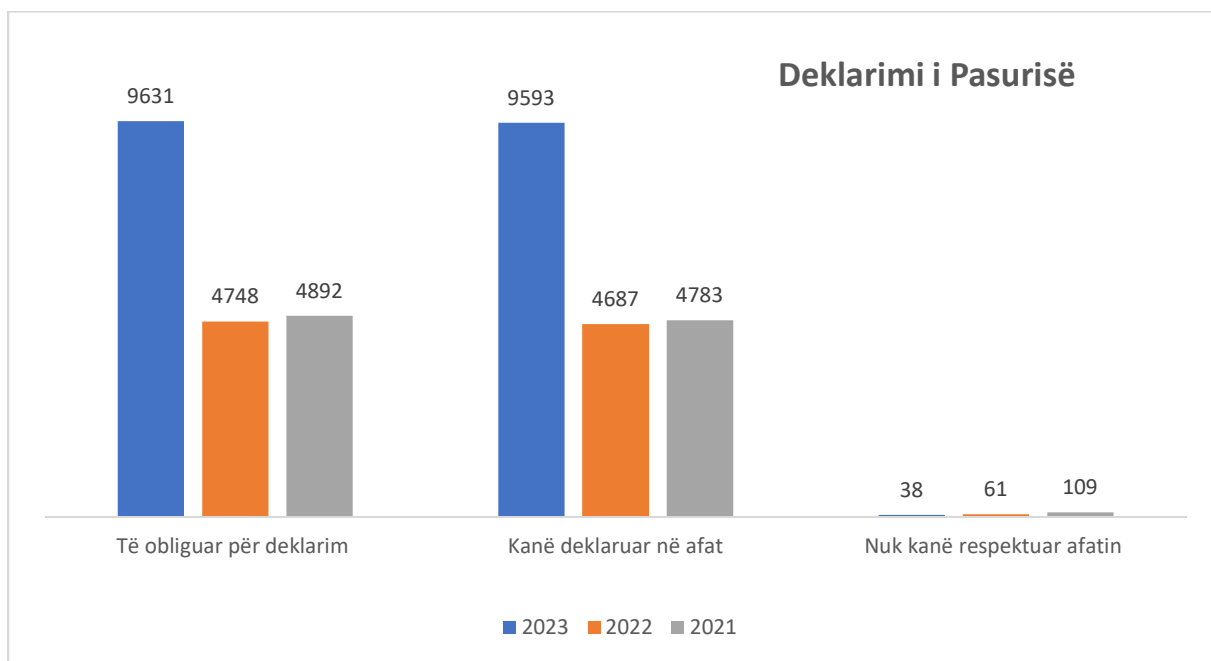


DECLARATION AND CONTROL OF ASSETS

A characteristic of the process of the regular annual declaration of assets during the comparison of three years is the increase in the responsibility of high public officials for the declaration of assets within the legal deadlines.

In 2021, out of 4892 declaring entities, 4783 or (97.77%) declared assets within the deadline, while 109 or 2.03% of officials did not respect the legal deadline for declaring assets. The year 2022 marked an increase in the accountability and responsibility of senior public officials to declare assets within the deadlines set by the legislation in force: out of a total of 4748 declaring entities, 4687 or (98.72%) declared assets within the deadline, while 61 or (1.28 %) of the officials did not respect the legal deadline for declaring assets.

Whereas in 2023, according to the regular annual declaration, **4,709** had the obligation to declare their assets: out of the total number, only 11 declaring entities did not respect the deadline. There were **3,791** declaring entities that had the obligation to declare assets for the first time. Out of this total number, 27 declaring entities did not respect the deadline.



| | Obliged with declaration | Declared on time | Did not respect the deadline |
|-------------|--------------------------|------------------|------------------------------|
| 2023 | 9631 | 9593 | 38 |
| 2022 | 4748 | 4687 (98.72%) | 61 (1.28%) |
| 2021 | 4892 | 4783 (97.77%) | 109 (2.23%) |

The commitment to respect the deadline for addressing the cases handled in the Agency, taking into account also the technical issues of the control development through the DSMA electronic system, the full control started late and during 2023 it started with the collection of information from the relevant institutions to verify the assets declared in the Agency by the declaring entities. In 2023, 1708 cases were carried over to 2024 according to the checklist, as well as 8 cases that we received according to the information.

(TABLE)

| Carried over cases | Years |
|--------------------|------------|
| 1716 | 2023-2024 |
| 22 | 2022- 2023 |
| 225 | 2021-2022 |

PREVENTION OF CORRUPTION IN PUBLIC PROCUREMENT

In order to prevent potential corrupt violations in public procurement, the Agency monitored public procurement activities from requests received by public institutions, monitoring the publication of procurement activities on the official website of the KPPC by the contracting authorities, activities of small,

large and medium value. In the reporting period January-December 2023, the Agency addressed 218 cases related to public procurement activities, which were initiated by decision under the reasonable suspicion of legal violations with corrupt elements in procurement activities that resulted in issuing 211 opinions, of which 162 opinions were respected by the institutions, 49 opinions were not respected, 33 cases were sent for preliminary investigation, while 7 cases were closed.

(CHART)

Number of cases addressed in the field of prevention of corruption in public procurement – 2023

| Number of cases | Opinions | Closed cases with reports | (Respected) opinions | (Not respected) opinions | UNDER INVESTIGATION |
|------------------------|-----------------|----------------------------------|-----------------------------|---------------------------------|----------------------------|
| 195 | 109 | 5 | 87 | 22 | 1 |

The number of cases addressed for the prevention of corruption in public procurement also significantly exceeded the number of cases addressed for the last three years, with 80 cases being addressed in 2020 and 108 cases in 2021. In the reporting period January-December 2022 the number of handling cases increased by 100% with the handling of a total of 218 cases. In parallel with the increase in the number of cases addressed during 2022, after handling cases for the prevention and fight against corruption in public procurement, 211 opinions were issued, which also exceeded the number of opinions in 2021 (only 18 opinions) and 2020 (54 opinions).

| Cases addressed in the field of prevention of corruption in public procurement 2023-2022- 2021 |
|--|
| 2023 - 195 addressed cases |
| 2022- 218 addressed cases |
| 2021- 108 addressed cases |

ADDRESSING THE WHISTLEBLOWING CASES

The trend of increased number of addressed informative and reporting cases in the Agency was also associated with an increase in the presentation of whistleblowing cases. During 2023, 20 cases were received, compared to 14 cases that were reported during 2022, showing an increasing trend in the number of reports. They were addressed as follows:

| Number of whistleblowing cases in 2022-2023 |
|---|
| 2023- 18 addressed cases |
| 2022 – 17 addressed cases |

IMPLEMENTATION OF LEGISLATION AGAINST CORRUPTION, ITS SUPPLEMENTATION AND AMENDMENT

Pursuant to legal obligations, according to the existing legal framework as well as its new amendments, Law No. 08/L-017 on Agency for the Prevention of Corruption as well as Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, the Agency has continued its mission towards the implementation of the legislation as well as the exercise of its duties and responsibilities regarding the fulfilment of legal obligations in implementing, improving and completing the legal framework, by approving sub-legal acts as well as important strategic documents such as: regulations, methodologies, practical guidelines, with the entry into force of which the Agency fulfilled its legal obligations according to the new legislative framework in the implementation of tasks and the functionalization of new powers according to legislation in force.

Law No. 08/L-017 on Agency for the Prevention of Corruption;
Law No. 04-L-050 on Declaration, Origin and Control of Assets of Senior Public Officials and Declaration, Origin and Control of Gifts of all Official Persons, amended and supplemented by the new Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts;
Law No. 06/L-011 on Prevention of Conflict of Interest in Exercising a Public Function; and
Law No. 06/L-085 on Protection of Whistle-blowers and the sub-legal acts.

The approval of sub-legal acts and strategic documents followed the approval of the above, such as:

Regulation No. 01/2023 on Prevention of Conflict of Interest in the Agency for the Prevention of Corruption;
Regulation No. 02/2023 on Internal Organization and Systematization of Jobs in the Agency for the Prevention of Corruption;
Regulation No. 03/2023 on Procedure of Administrative Investigations;
Methodology for Integrity Plans;
Methodology for Corruption Assessment in legislation;
Methodology for Corruption Risk Assessment;
Manual for the Asset Declaration Procedure through the Electronic System.

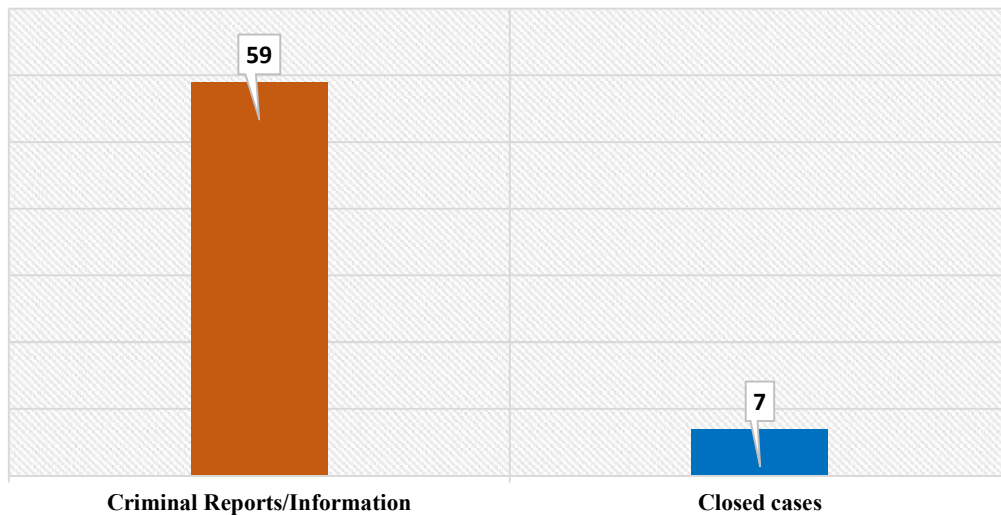
Depending on the various legal needs and requirements, numerous legal submissions (decisions, requests, responses, contracts, memorandums of understanding) have been compiled, as well as responses, opinions or various professional advice have been offered to all organizational units within the institution, in the analysis of a number of issues within the institution's mandate and other activities that fall within the competences and responsibilities of the Agency.

ADMINISTRATIVE INVESTIGATIONS

During the reporting January-December 2023, a total of 66 information was subject to the procedure of preliminary investigations by the Agency, with 59 cases being submitted to the Prosecutor's Office for further processing, while 7 cases were concluded. Comparison with the previous years, in terms of the number of cases addressed with a preliminary investigations procedure, is not possible because the role of the Agency for developing the preliminary investigations procedure, where a person suspecting of corruption may report the given case to the Agency, has been terminated with the legal amendments, namely the entry into force of Law. No. 08/L-017 on Agency for the Prevention of Corruption, and the

cases being addressed under this procedure are cases that were carried over from the previous year, which the APC was obliged to process according to the mandate at the time when the case was initiated.

During 2023, an anonymous information was addressed, 62 cases were initiated ex officio, and 3 others. The chart below presents the processing of 66 cases addressed during 2023.



Graphic presentation of cases addressed during 2023

CASES REFERRED TO LAW ENFORCEMENT AND JUDICIAL AUTHORITIES

During the reporting period, 59 criminal reports and information was submitted to the competent institutions (State Prosecutor's Office and Chief State Prosecutor's Office) for further processing, which the State Prosecutor's Office informed were delegated to the competence of the respective prosecution offices. The largest number of cases submitted in the Prosecutor's Office is comprised of actions sanctioned by Article 430 of the Criminal Code of the Republic of Kosovo No. 06/L-074 "Failure to report or falsely reporting property, revenue/income, gifts, other material benefits or financial obligations." Conversely, 2 cases submitted in the Chief State Prosecutor's Office for suspicious actions were not identified for the criminal offence they represent, as they exceed the investigational possibility and competence of the Agency.

The persons involved in these cases belong to different positions, such as member of parliament, member of an independent constitutional body, deputy minister, mayor, special prosecutor, judge, political and external adviser of the government cabinet, speakers and former speakers of municipal assemblies, advisors to municipal assemblies, dean, member of steering council of an independent institution, general director and acting director of executive agencies within ministries, members of steering council of subordinate institutions within ministries, department directors in independent institutions, ministries, executive agencies or public central enterprises, department directors in municipalities, board director in central and local public enterprises, chief executive officers of public enterprises at the local level, internal

auditors at the central and local level, audit officers in central public enterprises, chiefs of finance and financial officers in municipalities.

STATISTICAL INFORMATION ON WORK, INVESTIGATIONS, INDICTMENTS AND DECISIONS RELATED TO CASES REFERRED BY THE AGENCY

After conducting the preliminary investigation procedure, during the reporting period January-December 2023, the Agency issued another

- Request for evaluation of the alleged violations if the engagement of their employees in other institutions without compensation may affect their performance.

INDICTMENTS AND DECISIONS RELATED TO CASES REFERRED BY THE AGENCY

From the information received during 2023 from the respective Courts related to the cases of suspected corruption according to the indictments brought by the competent Prosecutor's Offices on the basis of the criminal reports of the Agency, 38 judgments of conviction, 2 judgments of acquittal and 7 judgments of rejection (dismissal of indictments) were issued. In table form, these data according to the courts are presented in the following table.

Court decisions related to Article 437 of the Criminal Code of the Republic of Kosovo No. 04/L-082, respectively Article 430 of the Criminal Code of Kosovo No. 06/L-074

| No. | Court | Judgement of conviction | Judgement of acquittal | Rulings |
|--------------|--------------------------|-------------------------|------------------------|----------|
| 1 | Basic Court of Prishtina | 22 | 2 | 3 |
| 2 | Basic Court of Prizren | 1 | - | - |
| 3 | Basic Court of Gjilan | 11 | - | 1 |
| 4 | Basic Court of Gjakova | 2 | - | - |
| 5 | Basic Court of Mitrovica | 1 | - | 1 |
| 7 | Basic Court of Peja | - | - | 2 |
| 8 | Basic Court of Ferizaj | 1 | - | - |
| TOTAL | | 38 | 2 | 7 |

With sentencing judgments, the Courts have mainly imposed fines, there are cases where probation sentences have been imposed (fines and incarceration), as well as effective imprisonment.

Fines were imposed in the amount of 150 EUR to 1000 EUR. These penalties were set to be paid mainly after the judgments become final, and in some cases in instalments, with the possibility of revoking the prison sentence, where 20 EUR will be calculated with one day of imprisonment in case the accused does not pay it and the fine cannot be enforced.

Probation sentences were mainly imposed with prison terms from 3 months to 1 year with a probationary period of up to 2 years.

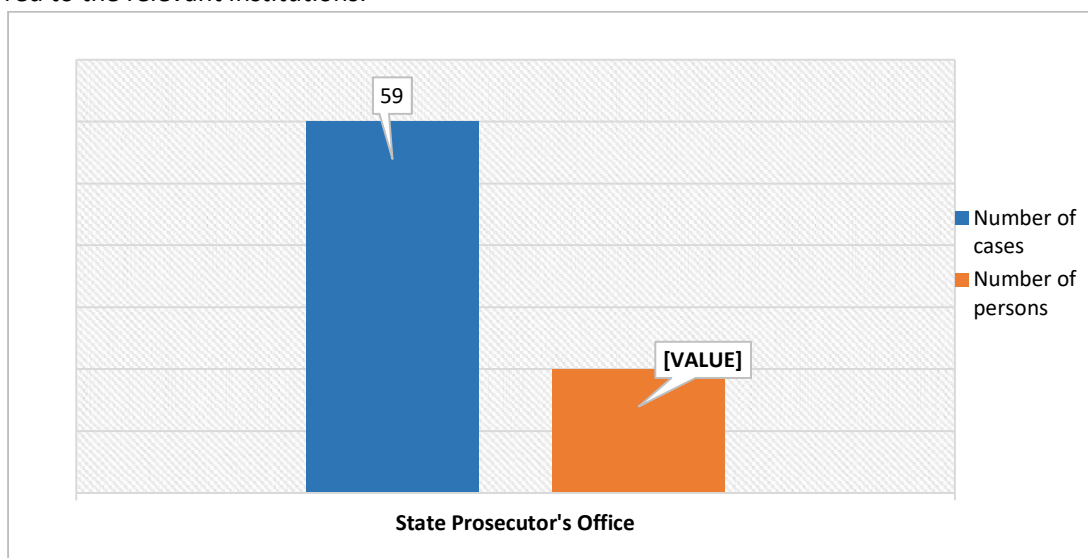
There are cases when the Court has imposed an effective prison sentence, which, by agreement between the Courts and the convicts, have been replaced by fines.

Judgments of conviction refer to the criminal offence from Article 437 of the Criminal Code of Kosovo No. 04/L-082, respectively Article 430 of the Criminal Code of Kosovo No. 06/L-074, where 27 cases of non-declaration of assets according to paragraph 1 of this Article, respectively 14 cases are related to regular annual non-declaration of assets, 5 cases related to non-declaration upon termination/dismissal from the public function, 8 cases related to non-declaration upon taking office, as well as 11 cases related to fake declaration of assets or non-declaration of the required data in the declaration according to paragraph 2 of this article, respectively 2 are related to non-declaration of accurate annual income, 2 are related to non-declaration of business (ownership of shares in a commercial organization), 2 are related to non-declaration of accurate immovable property (vehicle), and 4 are related to non-declaration of accurate real estate, whereas 1 case is related to non-declaration of personal income from the salary or participation in boards, commissions or other activities generating personal income and immovable assets.

With judgements of acquittal, the Court has acquitted the accused in 2 cases for non-declaration of assets according to paragraph 1 (failure to provide regular annual declaration of assets and upon taking office). In terms of dismissals, the Courts decided as follows: 3 cases of failure to provide regular annual declaration of assets, 1 case of failure to declare assets upon taking office, as well as 3 cases of failure to provide accurate declaration of immovable assets.

In 59 cases submitted to the Prosecutor's Office for further criminal processing after finding sufficient data and/or reasonable ground for involvement in corruptive actions, 57 persons were denounced.

Figure 2 graphically shows the number of criminal reports and information about persons involved in cases referred to the relevant institutions.



Presentation of the number of cases and number of persons submitted to the relevant institutions

Characteristic of the investigated cases related to the criminal offence of Failure to report or falsely reporting property, revenue/income, gifts, other material benefits or financial obligations (Article 430 of the Criminal Code of Kosovo No. 06/L-074) is failure to declare within the defined deadlines according to

the law in force (declaration upon taking office, declaration upon termination or dismissal from function) and failure to present the required data such as real estate, movable assets in value over three thousand (3,000) EUR, ownership of shares in a commercial organization or annual income.

In the reporting period, the cases for which the Agency's investigations found evidence for the verification of suspicions of corruptive actions which were submitted for further criminal proceedings in the competent institutions, belong to different years, starting from 2017 to 2022.

The Agency has continued to cooperate closely with the law enforcement institutions. The State Prosecutor's Office, based on its mandate, has continued to ask for additional evidence to prove the elements of the criminal offence beyond grounded reasonable doubt.

The legal provisions in force provide for the cases when investigations cease and initiated cases at the stage of investigations are dismissed. Cases were dismissed by the Prosecutor's Office based on several reasons, mainly due to the absence of proven reasonable doubt for the commission of the criminal offence:

1. There are other circumstances which exclude prosecution – it is an offence of an insignificant nature;
2. The judgment of acquittal of the Supreme Court is used as reference;
5. There are no essential elements of the criminal offence in the actions of the defendant;
6. There is a lack of intent as an essential element of the criminal offence;
7. The offence committed is not a criminal offence which is prosecuted ex officio or upon proposal, thus instructing the Agency to initiate an administrative/minor offence procedure;
8. The case may be resolved with an Alternative Procedure;
11. As a result of the defendant passing;

During this reporting period, after developing the preliminary investigation procedures, the Agency concluded 7 cases as it was found, after developing the preliminary investigations procedure, that there were no sufficient data and/or reasonable ground that the case may comprise a criminal offence or an administrative violation.

Through the Basic Prosecution, the Agency filed a total of 25 appeals in the Appeals Prosecutor's Office against their Rulings.

The role of the Agency for developing the preliminary investigations procedure, where a person suspecting of corruption may report the given case to the Agency, has been terminated with the legal amendments, namely the entry into force of Law. No. 08/L-017 on Agency for the Prevention of Corruption. As a result, the Agency has rejected 81 cases due to the lack of competence, by informing and instructing the reporters for other actions.

CASE REPRESENTATION IN COURTS

During 2023, the Agency represented a total of 33 cases initiated by the justice institutions. Of twenty-nine (29) criminal cases, twenty (20) were represented in Courts, and nine (9) in Prosecutor's Offices. The criminal cases represented by the Agency in Courts and Prosecutor's Offices were for the criminal offence of Failure to report or falsely reporting property, revenue/income, gifts, other material benefits or financial obligations, according to the Criminal Code of Kosovo.

In four (4) other cases, the Agency was represented as a sued party with the competent Court of Administrative Matters, which were built on the grounds of conflict of interest.

As noted above, representation was done in the competent Courts and Prosecutor's Offices, depending on the stage of the proceedings of the cases at hand.

DECLARATION AND CONTROL OF ASSETS OF SENIOR PUBLIC OFFICIALS

A characteristic of the process of the regular annual declaration of property emerging from the comparison of three years is the increase in the responsibility of high public officials for property declaration within the legal deadlines. In 2021, out of 4892 declaring entities, 4783 (or 97.77%) declared their assets within the deadline, while 109 or (2.03%) of the officials did not respect the legal deadline for declaring assets. In 2022, out of 4748 declaring subjects, 4687 or (98.72%) declared their assets according to the deadline, while 61 officials (or 1.28%) did not comply with the legal deadline for declaring their assets. On the other hand, in 2023, based on the new law on asset declaration, which came into force on February 11, the number of entities obligated to declare assets doubled. This law determined that the declaration of assets shall only be submitted electronically. The Agency, in cooperation with UNDP, has launched the system of electronic declaration of assets and during the transitional phase, only 624 forms were accepted in physical form (forms accepted in physical form were registered in the system by Agency officials), while other declarations were accepted electronically, which shows an extraordinary success in the implementation of the law on declaration of assets. In terms of regular annual declarations, **4,709** officials were obligated to declare their assets and only 11 declaring subjects did not comply with the deadline. There were **3,791** declaring entities that had the obligation to declare assets for the first time. Of this total number, 27 declaring entities did not abide by the deadline.

Likewise, the Agency has allowed access to the amendment or correction of possible errors in the asset declarations submitted through the electronic system when requested by the declaring entities within the time limit of 30 days as defined by law.

From the total number of high public officials who are obliged to declare their assets, a total of 1708 declaring entities and 27 declaring entities have been subjected to full control of their assets according to information reported by citizens through various forms.

GRAPH

| | Obligated to declare | Declared on time | Did not comply with the deadline |
|-------------|----------------------|------------------|----------------------------------|
| 2023 | 9631 | 9593 | 38 (0.39%) |
| 2022 | 4748 | 4687 (98.72%) | 61 (1.28%) |
| 2021 | 4892 | 4783 (97.77%) | 109 (2.23%) |

The Agency showed commitment to abide by the time limit in handling cases addressed to it despite the technical issues pertaining to implementation of controls through the DSMA electronic system. We started the full control late and during 2023 we started collecting information from relevant institutions to verify the asset declarations to the Agency by the declaring entities. In 2023, 1708 cases were carried over to 2024 according to the checklist, as well as 8 cases that were received according to information.

(TABLE)

| Cases carried over | Years |
|--------------------|-----------|
| 1716 | 2023-2024 |
| 22 | 2022-2023 |
| 225 | 2021-2022 |
| 600 | 2020-2021 |

DECLARATION BY TYPE

Based on the legal obligations defined by Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, the Agency has continued to supervise the assets of the declaring entities declared in the regular annual declaration, declaration when taking office and the declaration after termination or dismissal from office.

Regular annual declaration - Senior public officials are obliged to make a regular annual declaration of assets during the entire period of work in the public service, within the deadlines established by law, and are obliged to declare the state of their assets to the APC, from March 1 to 31 of each year for the previous year from January 1 to December 31. A total of **4709** senior public officials were obliged to make the regular annual declaration for 2023. Of this number, **4698** have declared their assets, while 11 declaring entities have not declared their assets within the time limit.

List of the regular annual declaration by institutions

| Institution | Officials obliged to declare their assets | Declared | Not declared |
|----------------------|---|----------|--------------|
| Presidency | 20 | 20 | 0 |
| Assembly | 148 | 147 | 1 |
| Government | 1480 | 1475 | 5 |
| Courts | 430 | 430 | 0 |
| Prosecutor's offices | 189 | 189 | 0 |

| | | | |
|--------------------------|-------------|-------------|-----------|
| Independent institutions | 493 | 493 | 0 |
| Municipalities of Kosovo | 1536 | 1531 | 5 |
| Public enterprises | 413 | 413 | 0 |
| TOTAL | 4709 | 4698 | 11 |

For the reporting period January-December 2023, the overview of regular annual declarations of assets is presented in the table below, including comparisons with 2021 and 2022.

| Years | Obligated to declare | Declared on time | Not complied with the deadline |
|-------|----------------------|------------------|--------------------------------|
| 2021 | 4892 | 4783 (97.77%) | 109 (2.23%) |
| 2022 | 4748 | 4687 (98.72%) | 61 (1.28%) |
| 2023 | 4709 | 4698 | 11 |

Declaration when taking office by senior public officials - Senior public officials who begin work in the public service in a full-time manner declare their assets within the legal term of 30 days from the day of taking office.

During the reporting year, new declaring entities categorized as such for the first time were also obliged to declare their assets. Thus, of the **3791** officials obliged to declare their assets, **3764** did so within the time limit, while **27** officials did not declare their assets within the legal deadline (i.e. three months). Thus, during the year, **586** declaring entities have declared their assets when taking office.

For the reporting period January-December 2023, the overview of asset declarations when taking office is presented in the table below, including comparisons with 2021 and 2022.

| Years | Obligated to declare | They declared on time | They did not respect the deadline |
|-------|----------------------|-----------------------|-----------------------------------|
| 2021 | 980 | 938 (95.71%) | 42(4.29%) |
| 2022 | 270 | 229 (84.82%) | 41 (15.18%) |
| 2023 | 4377 | 4350 | 27 |

Declaration of assets after termination or dismissal from office - Upon termination of engagement in a high public position, high public officials are obliged to declare assets within thirty (30) days.

During the reporting year, the Agency has received information from the contact officials that **545** declaring entities obliged to declare their assets after leaving public office have completed the exercise of public office.

For the reporting period January-December 2023, the overview of declarations after termination of the public function is presented in the following table for 2021, 2022 and 2023.

| Years | Obliged to declare | Declared on time | Did not comply with the deadline |
|-------|--------------------|------------------|----------------------------------|
| 2021 | 1072 | 1046 (97.57%) | 26 (2.43%) |
| 2022 | 107 | 89 (83.18%) | 18 (16.82%) |
| 2023 | 545 | 545 | 0% |

To ensure enforcement of the law and within actions against non-compliance with the legal obligations concerning regular declaration of assets, declaration when taking office and declaration after termination of the public function, in 2023 the Agency continued with further investigations in administrative procedures for 1716 cases.

Based on the data reported during the year 2023 for all types of asset declarations, **9631** senior public officials were obliged to submit their declarations, as shown in the following table.

| Type of declaration | Obliged |
|--|---------|
| Regular annual declaration | 4709 |
| When taking office | 4377 |
| After termination or dismissal from office | 545 |
| Total number | 9631 |

Based on Decision No. 01/1961/23 of the Director of the Agency, issued on 03/11/2023, in accordance with Law No. 08/L-017 on the Agency for Prevention of Corruption and Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, pursuant to Law No. 05/L-087 on Minor Offences, the commission composed of 5 members, after reviewing the documentation and communications carried out during 2023 for the reporting entities/contacting officials and relevant institutions, has recommended that 25 reporting subjects be fined in the amount total of **EUR 5,032.79**, the imposition of public reprimand against 8 declaring entities and the imposition of non-public reprimand against 5 declaring entities.

CONTROL OF ASSETS DECLARATION

Based on its mandate, the APC has performed the complete control of the assets declaration forms submitted by the declaring entities.

Complete control - Based on legal obligations, the Agency has performed the complete control of assets to verify the accuracy and authenticity of the data declared in the asset declaration forms for senior public officials who declare assets. The asset control was done for the declaring entities according to the law on

declaration of assets as follows: all the declaring entities according to Article 4 paragraph 1.1 to paragraph 1.18 were subjected to controls; 1/3 of the declaring entities from paragraph 1.19 to paragraph 1.38 were subjected to controls, selected through drawing of lots; and 50 declaring entities from those who declared their assets for the first time as required by Article 5, also selected through drawing of lots.

The process of complete asset control began by comparing the data declared over the years, received from other institutions such as Kosovo Business Registration Agency, Kosovo Cadastral Agency, Ministry of Finance - Department of Property Tax, Treasury, public enterprises, Civil Registration Agency, Tax Administration of Kosovo, public/private universities and other entities.

Out of the total number of high public officials who are obliged to declare their assets, 1708 declaring entities were subjected to complete control of assets in accordance with legal obligations. In addition to the initial list of officials subjected to complete control of assets, the Agency also initiated the *ex-officio* treatment of 27 cases involving senior public officials based on information reported by citizens through different forms.

The following table provides an overview of the complete control process.

Findings of the complete control of assets declaration

| According to the legal obligation | ex-officio (anonymous) | Still in control | Completed | In procedure | Forwarded for investigation in Administrative Procedures (APC)/Prosecutor's office/Police | |
|-----------------------------------|------------------------|------------------|-----------|--------------|---|---------------------------------|
| | | | | | Non-declaration of assets | Suspicious of false declaration |
| 1708 | 27 | 1735 | 19 | 1716 | 38 | 4 |

Complete control procedure of assets for the last three years:

| Years | Complete control | Cases closed | Cases forwarded for proceeding in administrative procedure | Cases carried over to 2024 | Cases handled (ex-officio) according to anonymous information or from NGOs |
|-------|------------------|----------------|--|----------------------------|--|
| 2021 | 966 | 916 (94.82%) | 50 (5.18%) | 225 (23.29%) | 12 |
| 2022 | 973 | 916 % (94.14%) | 57% (5.86%) | 13 (1.34%) | 41 |
| 2023 | 1735 | 19 (1.09%) | 0 | 1716(98.90%) | 27 |

ACCEPTANCE OF GIFTS IN CONNECTION WITH PERFORMANCE OF OFFICIAL DUTIES

Based on Law No. 08/L-108, public institutions are obliged to appoint the responsible official for keeping a gift registry. All gifts received and their respective value, as well as names of persons giving the gift, needs to be registered in the gift registry by the official person who is assigned by the Agency and are held by the institution in which the official person is exercising official duty. Copies of the catalogues shall be sent to the ACA no later than 31 March of the following year.

Submission of gift catalogues

During March 2023, the Agency received notifications from 179 institutions, of which 14 institutions have declared that they have received gifts, while 165 have declared that they have not received gifts during the previous year.

The institutions that submitted copies of their gift catalogues for the previous year are: Presidency of the Republic of Kosovo; Assembly of Kosovo; Office of the Prime Minister; Ministry of Education, Science and Technology; University of Prizren; Ministry of Economy; Ministry of Foreign Affairs and Diaspora; Ministry of Internal Affairs; Ministry of Industry, Entrepreneurship and Trade; National Audit Office; Constitutional Court of Kosovo; Agency for Prevention of Corruption; and the Academy of Justice.

The specified data related to the gift catalogues according to the institutions that submitted copies of their catalogues to the APC are presented in the following table:

| No. | Institution | Protocol gifts | Casual gifts | Overall number |
|-----|--|----------------|--------------|----------------|
| 1. | Presidency of the Republic of Kosovo | 67 | - | 67 |
| 2. | Assembly of Kosovo | 15 | 2 | 17 |
| 3. | Office of the Prime Minister | 67 | 92 | 159 |
| 4. | Ministry of Education, Science and Technology | 1 | - | 1 |
| 5. | University of Prizren | 5 | 2 | 7 |
| 6. | Ministry of Justice | - | 2 | 2 |
| 7. | Ministry of Economy | 1 | 1 | 2 |
| 8. | Ministry of Foreign Affairs and Diaspora | - | 2 | 2 |
| 9. | Ministry of Internal Affairs | 1 | - | 1 |
| 10. | Ministry of Industry, Entrepreneurship and Trade | 1 | - | 1 |
| 11. | National Audit Office | 2 | 3 | 5 |
| 12. | Constitutional Court of Kosovo | 14 | - | 14 |
| 13. | Agency for Prevention of Corruption | 7 | - | 7 |

| | | | | |
|-----|--------------------|------------|------------|------------|
| 14. | Academy of Justice | 0 | 1 | 1 |
| | Total | 181 | 105 | 286 |

List of gift catalogues declared over the last three years:

| Years | Protocol gifts | Casual gifts | Total |
|-------------|----------------|--------------|-------|
| 2021 | 6 | 22 | 28 |
| 2022 | 114 | 73 | 187 |
| 2023 | 181 | 105 | 286 |

During the reporting year, During September 4 to 8, 2023, the Division for Supervision of Assets and Gifts visited and inspected 13 institutions related to the keeping and registration of gifts declared by the official persons of these institutions. They were also notified of the legal obligation to store and record gifts and display them in a special corner in their respective institution.

The list of institutions that were inspected during 2023 includes the following entities:

1. Energy Corporation of Kosovo J.S.C.;
2. Posta e Kosoves J.S.C.;
3. KOSTT J.S.C.;
4. Hidromarava J.S.C.;
5. Hidroregioni Jugor J.S.C.;
6. Ambienti J.S.C.- Peja;
7. KRU Mitrovica J.S.C., Mitrovica;
8. Bifurkation-Ferizaj Regional Water Company;
9. Local Public Enterprise Ambienti J.S.C., Ferizaj;
10. North Mitrovica Municipality;
11. Peja Municipality;
12. University of Prizren – "Ukshin Hoti", Prizren;
13. "Kadri Zeka" University, Gjilan.

PREVENTION OF CONFLICT OF INTEREST IN THE EXERCISE OF PUBLIC FUNCTIONS

The Agency has undertaken appropriate administrative investigative actions to handle cases of conflict of interest by issuing decisions, opinions, advice and recommendations, in accordance with the provisions of Law No. 06/L-011 on Prevention of Conflict of Interest in the Exercise of Public Function.

The Agency has achieved its primary goal - prevention of conflict of interest during the exercise of public functions in public institutions of the country together with the responsible authorities of public institutions. To this end, it has continuously provided professional support to them, to prepare them as

best as possible for identifying, handling and resolving cases involving potential conflict of interest within their respective institutions.

The actions of the Agency during the reporting year were undertaken in an objective, impartial and professional manner and in accordance with the relevant legislation in force. This is usually done through the initiation of cases according to official duty, information received from natural or legal persons, information received anonymously and information from the public, with the aim of preventing conflicts of interest in public institutions and in the service of strengthening the integrity and institutional transparency in the Republic of Kosovo.

| Institution | Cases presented involving conflict of interest | Cases where conflict of interest was avoided | Cases without conflict of interest | Cases for Court | Cases for the Prosecutor's Office | Cases in progress (carried over to 2024) | Opinions - Answers |
|---|--|--|------------------------------------|-----------------|-----------------------------------|--|--------------------|
| Government, agencies, public universities | 87 | 5 | 20 | 1 | 2 | 5 | 54 |
| Courts | 5 | | 1 | | | | 3 |
| Prosecutor's offices | 3 | | | | | | 3 |
| Independent institutions | 29 | 1 | 7 | | | 3 | 23 |
| Public enterprises | 15 | 2 | 4 | | | | 6 |

| | | | | | | | |
|------------------|-----|----|----|---|---|----|-----|
| Local government | 75 | 38 | 8 | 2 | | 15 | 13 |
| Total: | 216 | 46 | 40 | 3 | 2 | 23 | 102 |

During the reporting period January-December 2023, in order to prevent alleged conflict of interest, a total of 216 cases were presented. Out of the total number of cases, 98 cases were handled upon submission of requests by natural or legal persons, 54 of them were handled based on official duty, 8 cases were handled based on media reports, 2 cases were raised by non-governmental organizations, and 54 cases were handled after information received in the form of reports from outside.

Compared to previous years, namely to the last three years, in the reporting period January - December 2023, the number of cases involving prevention of conflict of interest handled in the Agency has increased, especially in terms of providing answers concerning certain situations related to suspicions of incompatibility or exercising the function under conditions of conflict of interest.

In terms of the number of cases as compared to previous years, in 2021 there were 105 cases, in 2022 there were 233 cases, and now in 2023, there are a total of 214 cases presented.

It is worth noting that in addition to the above-mentioned reports and requests for the handling of conflict of interest claims, several cases for final assessment of the conflict of interest have been addressed to the Agency by law-enforcement institutions, such as the State Prosecutor's Office and the Kosovo Police.

The table below presents in graphical forms the cases handled 2023

Unlike the previous year, when a total of 233 cases were submitted, the number of cases in this reporting year is 216, i.e. 19 cases less than the previous year. This is partially as a result of strengthening the responsible authorities in the institutions, which is actually a priority goal of the Agency; to this end, the responsible authorities handled 181 cases in 2023, i.e. 16 more cases than in the previous year.

All this points to the efficiency, good organization and teamwork within the two divisions responsible for handling cases within the Department, despite the marked lack of necessary staff in the Department for Prevention of Conflict of Interest.

The total number of cases handled by the Agency during 2023 is as follows: 102 advices and opinions were offered, in 46 cases treated subjects avoided conflict of interest, 40 cases resulted without conflict of interest, 2 cases were sent to the Prosecutor's Office, while 3 other cases were transferred to the competent court for minor offences.

Out of the 193 cases treated, 54 were initiated *ex-officio*, eight cases were treated after reports addressed by the media, and two other cases were reported by Non-Governmental Organizations.

The Law on Prevention of Conflict of Interest has defined the Agency for Prevention of Corruption the central authority for the treatment and prevention of conflict of interest.

In addition, Article 20 of the LPCoI stipulates that the conflict of interest must be dealt with by the responsible authorities of public institutions, including the direct leaders of officials according to the hierarchy within an institution, as well as obliging the institutions to foresee within their internal acts and implement special rules for the prevention of conflict of interest, depending on the scope of public institutions.

Year 2023 was characterized by an increase in the number of cases handled by the Authority responsible for the prevention of conflict of interest. In contrast to 2020, where only 46 cases were handled by the responsible authorities, 101 cases were handled in 2021, 121 cases were handled by the responsible authorities in 2022, while the responsible authorities handled a total of 181 cases in the reporting year (2023).

The table below provides specific information on cases handled by responsible authorities during 2023.

| Institution | All cases involving conflict of interest submitted to the APC | Cases where conflict of interest was avoided | Cases without conflict of interest | Cases with conflict of interest/ Forwarded to disciplinary procedure | Opinion / Recommendation | Cases still in process | Cases Sent to APC |
|---|---|--|------------------------------------|--|--------------------------|------------------------|-------------------|
| Government, Ministries, Executive Agencies and Subordinate Institutions | 86 | 21 | 16 | 7 | 25 | 3 | 14 |
| Presidency | 1 | 1 | - | - | - | - | - |
| Assembly of Kosovo | 3 | 3 | - | - | - | - | - |
| Court / Prosecutor's Office | 2 | - | 2 | - | - | - | - |
| Independent institutions | 32 | 17 | 11 | - | 2 | - | 2 |
| Public enterprises | 41 | 8 | 4 | 29 | - | - | - |
| Local government | 16 | 14 | 1 | - | - | 1 | - |
| Total: | 181 | 64 | 34 | 36 | 27 | 4 | 16 |

In order to prevent conflict of interest, during 2023, the Agency provided 77 answers (advice, recommendations and clarifications) through electronic communication (official email) to public officials and public institutions upon their requests.

Activities aimed at strengthening and empowering the responsible authorities

The Department for Prevention of Conflict of Interest, as part of its activities for strengthening and empowering the responsible authorities, during 2023 held five training sessions with representatives of the country's public institutions, as authorities appointed for the prevention and resolution of conflicts of interest.

Trainings were held on the topic: "Importance of preventing conflict of interest and role of responsible authorities according to Kosovo legislation, regional and international practices".

Three of these trainings were supported by the PECK III Project of the Council of Europe, in which, in addition to Agency officials, regional and international experts also delivered lectures. The trainings were held on September 20, 21 and 22, 2023.



Two other training sessions on this topic were later supported by the OSCE, where the Director of the Department for PCoI and the Head of the Division for Cooperation with Responsible Authorities presented to representatives of the country's public institutions. They were held on November 22 and 23, 2023.



ANALYSIS:

The number of requests for dealing with conflict of interest, namely incompatibilities in the exercise of public functions, increased significantly due to the fact that during the reporting year there were

numerous elections and appointments to leadership positions in public institutions and enterprises of the country.

The increase in the number of cases for the prevention of conflict of interest, on the one hand, shows the continuous increase in the trust and readiness of citizens and public officials to address the issues of conflict of interest to the Agency as a specialized institution for dealing with this problem. On the other hand, it also shows the reluctance of public officials or their direct leaders to evaluate themselves as they are legally required in order to resolve these situations within their institutions, despite the constant training and counselling provided by the Agency to the responsible authorities.

It should be emphasized that a significant number of requests to the Agency are also forwarded through the Kosovo Police for handling conflict of interest for cases that have been reported and initiated directly by the prosecutor's offices and by the Police.

Whereas, as regards the nature and characteristics of the decisions that the Agency issued during 2023, it should be emphasized that there are decisions of different natures, but always with the aim of avoiding decision-making with conflict of interest or incompatibilities in the exercise of public functions.

Examples:

- By decision of the Agency, the contract for special services of a former Deputy Minister was cancelled for violation of the restrictions (*ex-post*) of Article 18 of the LPCoI;
- A contract concluded under conditions of conflict of interest between a Minister of a Ministry and a Private College was cancelled;
- By decision of the Agency, conflict of interest was found regarding a municipal mayor, whereupon the decision revealing the conflict of interest was annulled, return of funds was requested, and the case was reported to the competent prosecutor's office.
- Following a decision of the Agency ascertaining conflict of interest, the service contract of a director of a municipal directorate was canceled and he was forced to return the funds obtained through the procurement contract concluded under conditions of conflict of interest. The case was also addressed to the court of minor offences;
- Following a decision of the Agency ascertaining conflict of interest, an administrative act related to employment concluded under circumstances involving conflict of interest in a regional hospital was canceled and the case was also addressed to the court of minor offences;
- Following a decision of the Agency ascertaining incompatibility in the exercise of public function by a director of a municipal directorate, who was also the head of a non-governmental organization, the Agency initiated a request to start the dismissal procedure and the case was also processed to the court of minor offences.

Below is a summary of the actions of high public officials to avoid conflict of interest in the exercise of public functions

- 29 resignation from the managerial/leading function and/or authorized person in private businesses,
- 12 resignations from Non-Governmental Organizations,
- 2 resignation from public functions to keep management functions in private businesses,
- 1 resignation from a public function due to incompatibility with another public function,
- 1 case was initiated with a criminal complaint.

PREVENTION OF CORRUPTION IN PUBLIC PROCUREMENT AND MONITORING

In order to prevent possible conflict of interest and other possible irregularities in public procurement activities with corrupt elements, the Agency has monitored procurement activities of minor, major and medium amounts published on the official website of the PPRB by the contracting authorities. In the reporting period January-December 2023, the Agency handled 195 cases related to public procurement activities, which were initiated by decision under the reasonable suspicion of legal violations with corrupt elements in procurement activities that resulted in issuing 109 opinions, of which 87 opinions were respected by the institutions, 22 opinions were not respected, 1 case was sent to the competent bodies for investigation, 2 answers related to the handling of the conflict of interest in public procurement, 1 decision related to the handling of the conflict of interest, while 5 cases have been closed, as well as 78 telephone advices.

Number of cases handled in the field of prevention of corruption in public procurement - 2023

| Number of cases | Opinions | Cases closed with report | Opinions (complied with) | Opinions (not complied with) | Advice provided via telephone | Answers on Col | Decision on Col | Ongoing investigation |
|-----------------|----------|--------------------------|--------------------------|------------------------------|-------------------------------|----------------|-----------------|-----------------------|
| 195 | 109 | 5 | 87 | 22 | 78 | 1 | 1 | 1 |

Number of cases handled in the field of prevention of corruption in public procurement - 2022

| Number of cases | Opinions | Cases closed with report | Opinions (complied with) | Opinions (not complied with) | Ongoing investigation |
|-----------------|----------|--------------------------|--------------------------|------------------------------|-----------------------|
| 218 | 211 | 7 | 162 | 49 | 33 |

Number of cases handled in the field of prevention of corruption in public procurement - 2021

| Number of cases | Opinions | Cases closed with report | Cases closed with report | Opinions (complied with) | Advice provided via telephone (complied with) | Advice provided via telephone (not complied with) |
|-----------------|----------|--------------------------|--------------------------|--------------------------|---|---|
| | | | | | | |

| | | | | | | |
|-----|----|---|----|---|----|----|
| 108 | 18 | 7 | 18 | 0 | 64 | 19 |
|-----|----|---|----|---|----|----|

Number of cases handled in the field of prevention of corruption in public procurement - 2020

| Number of cases | Opinions | Cases closed with report | Opinions (complied with) | Opinions (not complied with) | In procedure | Ongoing investigation |
|-----------------|----------|--------------------------|--------------------------|------------------------------|--------------|-----------------------|
| 80 | 54 | 21 | 51 | 3 | 4 | 1 |

RISK ASSESSMENT AND LEGAL ACTS AGAINST CORRUPTION

In accordance with the legal obligations defined by the Law on the Agency for Prevention of Corruption, as regards the new additional powers, assessment of the risk of corruption and assessment of legal acts against corruption, the Agency has undertaken preparatory actions for the implementation of legal responsibilities in relation to the assessment of risk as well as anti-corruption assessment of legal acts.

Within its responsibilities, the Agency has continued to make a comparative analysis of the current legislation and sub-legal acts on the need to introduce an assessment of the risk of corruption, and the creation of preconditions for the elimination of further risks. Implementing this action, the Agency has planned to ensure that this legal responsibility is implemented by a specialized unit of the Agency in the new organizational structure of the Agency, which is expected to be operational in 2024.

The preparation of the corruption assessment methodology, in addition to local legislation, also took into consideration the recommendations of the European Commission's Report on Kosovo and of the legislative and executive authorities at the state and local level, as well as the legal obligations in order to raise the level of awareness regarding the fulfillment of obligations defined for the prevention and fight against corruption. This methodology was approved by the Director's decision and endorsed through a sub-legal act approved by the Director of the Agency.

In 2023, the Agency, in cooperation with the Council of Europe through the PECK 3 project, commenced preparations for the exercise of mapping the risk of corruption in public sector institutions and public enterprises according to the methodology prepared by the Division for Cooperation against Economic Crime of the Council of Europe. Mapping the risks of corruption is a necessary step to prevent corruption and strengthen institutional integrity and transparency in Kosovo. It consists in the identification of sectors, activities and functions with the highest possible risk of corruption, which will be used to identify the areas of risk to be able to set priorities for a more efficient use of efforts and resources for prevention of corruption in the public service in Kosovo. Within this exercise, the institutions involved in the process have been identified and a request/questionnaire has been prepared for the collection of information and documentation. The process will continue in 2024.

The methodology for assessing the potential of corruption in legislation has been introduced through a sub-legal act approved by the Director of the Agency and is oriented towards the elimination of the risk of corruption and the degree of compatibility of domestic legislation with international standards. It also includes the analysis of legal and sub-legal acts of public institutions for the elimination of areas of risk and legal loopholes that can be used for possible misuse of official duties.

According to this methodology, the Agency has prepared a draft opinion on certain provisions of a law, which has been carried over to 2024 for further review.

INTEGRITY PLANS

The obligation to approve integrity plans by public institutions was strengthened through the approval of Law No. 08/L-017 on the Agency for Prevention of Corruption (Official Gazette, 21 July 2022).

Article 25 of Law No. 08/L-017 on the Agency for Prevention of Corruption obliges the institutions of the central administration, independent agencies, and municipal authorities to draft and approve integrity plans, no later than six months after approval of the uniform methodology for the drafting of these plans.

On 26 July 2023, the methodology for integrity plans was approved by the Agency for Prevention of Corruption (available at this link: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=78702>), which serves as a guide for all the stages that must be followed by the institutions during the drafting of their integrity plans.

The aforementioned institutions were obliged to have the Integrity Plans approved within a period of six (6) months.

During this period, the APC initially listed all the institutions responsible for drafting integrity plans.

After that, the APC communicated through email with all the leaders of these institutions, informing them the legal obligations to follow the procedures regarding the drafting of integrity plans and the appointment of responsible officials.

After receiving the data about the responsible officials, the APC with the support of the OSCE Mission in Kosovo, during the month of October 2023, organized five (5) informative training sessions on how to draw up integrity plans, inviting all the responsible officials designated by public institutions. The trainings were held on October 11, 12, 17, 19 and 24, 2023.

Relevant materials related to the drafting of integrity plans were shared with all the responsible officials appointed by the public institutions, as well as constant communication was made with them about any ambiguity that appeared during this journey.

In addition to continuous communications, recommendations for draft integrity plans were provided to every public institution that requested this and moreover many institutions that had difficulties with the drafting of the integrity plan were visited in order for this procedure to go well and within the legal deadlines. They were also reminded of the last legal deadline for the approval of integrity plans.

COOPERATION WITH LOCAL INSTITUTIONS

When fulfilling its legal obligations within the framework of cooperation with local institutions, during the reporting period, the Agency has cooperated with all relevant institutions in the implementation of its

field of activity. A series of meetings have been held, including participation in the supplementation and drafting of primary and secondary legislation and other actions with respect to the demands and needs of the Agency.

The following activities and representations within the initiatives of cooperation and coordination of activities with local high-level institutions have been carried out by the Director of the Agency:

- Meeting with the Kosovo Law Institute officers / 11 January 2023;
- Meeting with the Ministry of Culture, Youth and Sports officials / 18 January 2023;
- Meeting with the Minister of the Ministry of Local Government Administration - Mr. Elbert Krasniqi / 25 January 2023;
- Attended the PAR Progress Kosovo 2023 annual conference / February 21, 2023
- Attended the Annual Conference 'Enhancing Public Oversight and Institutional Accountability in Kosovo' / 22 February 2023;
- The Director of the Agency participated in the Meeting of the Law Enforcement Strategy Steering Committee / 4 April 2023;
- The Director of the Agency attended the conference "E-Governance Strategy for Improving Public Service Delivery" / 6 April 2023;
- The Director of the Agency participated in the first meeting of the Working Group responsible for drafting the State Anti-Corruption Strategy / 23 May 2023;
- The Director of the Agency received in a meeting Mr. Constantine Palicarsky from UNODC / 23 May 2023;
- The Director of the Agency participated in the discussion table organized by the United Nations Office on Drugs and Crime UNODC / 26 May 2023;
- The Director of the Agency met with the Mayor of Shtime, Mr. Qemajl Aliu / 21 June 2023;
- The Director of the Agency participated in the Fifth Ministerial Council Meeting for European Integration / 12 July 2023;
- The Director of the Agency participated in a panel discussion table organized by the International Republican Institute (IRI) in Kosovo to discuss Kosovo's potential weaknesses to foreign malign influence and kleptocracy / 18 July 2023;
- The Director of the Agency participated in the joint meeting for the signing of the Administrative Investigation Guide / 18 July 2023;
- The Director of the Agency participated in the Regional Workshop on the Anti-Corruption Strategy / 1 September 2023;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, met with the Director of the Agency for Prevention of Corruption of Montenegro, Mrs. Jelena Perović / 4 September 2023;
- The Director of the Agency met Mr. Nuno Queiros, the UNDP Permanent Representative to Kosovo / 25 September 2023;
- The Director of the Agency participated in the Conference on Local Governance Transparency organized by the NGO AKTIV / 27 September 2023;
- The Director of the Agency participated in the Conference organized by the Information and Privacy Agency on "Public Document Access Week" / 28 September 2023;
- The Director of the Agency participated in the meeting of the Working Group for the oversight of law enforcement in the Assembly / 29 November 2023;
- The Director of the Agency participated in the Conference organized by KDI, "Is it the right time for the Law on Lobbying?" / 5 December 2023;

- The Director of the Agency participated in the Conference “From Transparency to Trust: Solutions for combating corruption and organized crime at the institutional level” CorrWatch / 11 December 2023;
- Director Yll Buleshkaj met with Ambassador Tomáš Szunyog, Head of the EU Office in Kosovo, Kushtrim Hodaj on 04 October 2022;
- As part of the commitments to provide a professional contribution to the drafting of primary legislation in Kosovo, the Director of the Agency, as a member, participated in the Working Group on Confiscation of Assets, as well as in the Council for Democracy and Human Rights, established by the President of the Republic of Kosovo / 23.09.2022;
- The Director of the Agency participated in the Public Hearing for Draft Law No. 08/L-121 on State Bureau / 23 September 2022;
- The Director of the Agency participated in the meeting of the Democracy and Human Rights Council / 02 December 2022;
- The Director of the Agency participated in the meeting on the Draft Law on Salaries and the Draft Law on Public Officials / 06 October 2022;
- The Director of the Agency participated in the meeting of the Rule of Law Strategy Steering Committee / 27 July 2022;
- The Director of the Agency participated in the meeting of the Public Procurement Regulatory Commission in cooperation with USAID through the project ‘Kosovo Municipal Integrity Activity’ / 22 December 2022;
- Meeting with EU Special Representative / 21 December 2023.

COOPERATION WITH INTERNATIONAL ORGANIZATIONS AND FOREIGN INSTITUTIONS

International cooperation has also been carried out through the representation and participation of the Agency's director and staff in activities inside the country and abroad, including participation in international and regional visits, representations at regional conferences, and other activities with the aim of representing the Agency and exchanging positive experiences in preventing and combating corruption:

- A delegation from the Agency for Prevention of Corruption, led by Director Yll Buleshkaj, participated in the third regional meeting organized by RAI in Sarajevo, focusing on improving public policies in whistleblower protection / 31 January 2023
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated in the Regional Forum “Anti-Corruption Policies as Guarantees for National Security, Stability and Sovereignty” in Sofia, Bulgaria / 22 March 2023;
- As part of international exchange of experiences on whistleblower protection mechanisms, Kosovo’s delegation, led by the Director of the APC, Yll Buleshkaj, conducted a study visit to Ireland, where they were received by heads of specialized institutions in whistleblower protection and mechanisms for preventing and combating corruption / 27 April 2023;
- The Agency for Prevention of Corruption of Kosovo is exchanging experiences regarding the institutional integrity plans process with the Montenegro Anti-Corruption Agency.
- A delegation from the Agency for Prevention of Corruption of Kosovo, led by the Director, Yll Buleshkaj, accompanied by representatives of the NGO Levizja FOL and UNDP in Kosovo,

conducted a one-day visit to the Agency for Prevention of Corruption of Montenegro. / June 7, 2023

- The Agency for Prevention of Corruption of Kosovo participated in the Regional Event organized by the Secretariat of the Regional Anti-Corruption Initiative (RAI) for Monitoring and Assessing Legislative Mechanisms against Corruption Acts / 23 June 2023;
- On 12-13 September 2023, a delegation of the Agency for Prevention of Corruption (APC), led by the Director, Yll Buleshkaj, conducted a two-day study visit to Austria to exchange international experiences on mechanisms for preventing and combating corruption, public awareness and education, as well as whistleblower protection. The delegation was received by the Office of the Coordinator of Economic and Environmental Activities of the OSCE (OCEEA) and the Federal Anti-Corruption Bureau of Austria (BAK). This activity was conducted with the organization and support of the OSCE / 12-13 September 2023;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated in a conference organized by the International Republican Institute on the topic "Empowering Democracy's Response to Transnational Kleptocracy" in Rome, Italy, on 18-20 September, 2023. Director Buleshkaj was part of the panel discussion where efforts by the EU and national level to advance transparency on beneficial ownership were discussed, including necessary policy reforms, improvement of existing databases and access, as well as addressing the challenge of ensuring privacy rights / 18-20 September 2023;
- The Agency for Prevention of Corruption of Kosovo participated in the regional roundtable on "Promoting Anti-Corruption Education" organized by the United Nations Office on Drugs and Crime (UNODC) and funded by the Federal Republic of Germany (German Cooperation). The roundtable was held in Becic, Montenegro / 22 September 2023;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated in the 22nd Monitoring Meeting and the 28th Steering Group Meeting of the Anti-Corruption Network for Eastern Europe and Central Asia (ACN) of the Organization for Economic Cooperation and Development (OECD) / 3-5 October 2023;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated in the Regional Workshop on Developing Effective Investment Control Mechanisms in the Western Balkans, held in Prague, Czech Republic. This workshop is organized by the Commercial Law Development Program (CLDP) of the U.S. Department of Commerce in coordination with the U.S. Department of Commerce, U.S. Department of State, U.S. Department of the Treasury, U.S. Embassy in Prague, and the Ministry of Industry and Trade of the Czech Republic / 10 October 2023;
- The representative of the Agency for Prevention of Corruption, Mr. Esad Ejupi, Department Director, participated in the executive-level Symposium focused on strategic leadership and international cooperation in effective detection, investigation, and prosecution of corruption. The Symposium is organized by the International Law Enforcement Academy (ILEA Roswell) at the International Law Enforcement Academy in Budapest (ILEA Budapest) / 01 February 2023.

REGIONAL COOPERATION

- The Agency for Privation of Corruption of Kosovo participated in the Regional Conference on “Transposition of the EU Directive on Whistleblowing in the Western Balkans: Experiences and Lessons Learned from EU Member States in Southeast Europe”, organized in Tirana by the Southeast Europe Coalition for Whistleblower Protection, a regional network of NGOs, involving representatives from Albania, Montenegro, North Macedonia, Croatia, Bulgaria, Greece, Romania and the EU Delegation in Albania / 13 June 2023
- A delegation from the Agency for Privation of Corruption, led by Director, Mr. Yll Buleshkaj, visited the High Inspectorate for the Declaration and Control of Assets and Conflict of Interest (HIDCACI). The Kosovo delegation was received by the General Inspector, Ms. Evgjëni Bashari, and her colleagues / 8 November 2023;
- The Director of the Agency is participating in the Regional Conference “Closing the Gap: Effective Asset Declaration in Southeast Europe” organized in Skopje, North Macedonia / 20 December 2023.

MEDIA ACTIVITIES

As a result of fulfilling its goal of carrying out its mandate with transparency and accountability, the Agency has maximally increased the number of concrete actions by cooperating with all relevant actors to prevent corruption in Kosovo, and in the reporting period January-December 2023, it has carried out a considerable number of media activities to raise the awareness of the general public.

The Agency’s media activities during 2023 focused on communication with the media, the organization of conferences, interviews for the media, and cooperation with the media in initiating the addressing of cases for the prevention of conflict of interest, administrative investigation procedures, and suspicions of inaccurate declaration of assets, as well as the pro-active publication of information on the APC website. In 2023, the Agency organized three media conferences:

- Media conference - Award for the Most Successful Officer in Handling Whistleblowing Cases
- Commencement of the monitoring process by the Council of Europe
- Information campaign on the APC mandate - Including 2 informative videos broadcasted on public television and social media networks

As part of public information and accountability and responding to journalists’ requests during 2023, a total of 42 interviews or statements were conducted.

Compared to 54 responses provided to the media in 2021, and 165 responses in 2022, during the reporting period January-December 2023, the Agency provided responses to about 145 questions received from the media.

(CHART)

| |
|---|
| Difference of communication with media between the years 2022,2021 and 2020 |
| 2022- 165 responses to media |
| 2021- 54 responses |
| 2020- 75 responses |

The requests from the media were aimed at obtaining information with respect to the prevention and fight against corruption, the process of preliminary investigations, the declaration of assets, the issues of preventing conflict of interest, as well as interests for information related to the prevention and fight against corruption in public procurement.

Cooperation with the media was also achieved from another dimension that directly influenced the undertaking of the Agency's initiatives for the prevention of corruption by addressing the media reports regarding the possible abuse of official duties, the possible conflict of interest, the declaration of non-compliance property, and other illegal acts with priority.

What is characteristic for the reporting period January-December 2022, as a result of communication and cooperation with the media and Non-Governmental Organizations, is that the Agency handled a total of 48 cases, reported by the media and Non-Governmental Organizations related to the prevention of conflict of interest, the declaration of assets and the possible abuse of official duties, of which 12 reports were received from Non-Governmental Organizations while 36 reports were received from the media.

The Agency handled 48 cases reported by the media and non-governmental organizations that pertained to the agency's areas of competence; 12 reports were received from non-governmental organizations, while 36 reports were received from the media.

(CHART)

- *The Agency's commitment to strengthen public communication with regard to the compliance with the legislation on the use of official languages in Kosovo, resulted in the fact that on December 12, 2022, for the first time since its establishment, the Agency received as a recognition from the Office of the Language Commissioner (OLC), in cooperation with the Organization for Security and Cooperation in Europe, Mission in Kosovo (OSCE), the award "For the best practices in the implementation of the Law on the Use of Languages" and was declared as the institution with the best performance in the implementation and promotion of two official languages in Kosovo.*

In the framework of increasing the opportunities for publishing information about the Agency, on February 14, 2022, the Agency launched the use of the communication platform through the Facebook social network, while the publication of information and public communication continued to be carried out through the provision of information published on the Agency's website. Over 5,000 registers of declaration of assets were published on the APC website <http://www.akk-ks.org> within the framework of the transparency of the publication of information on the declaration of assets by public officials. During the January–December 2022 period, the Agency published a total of 134 pieces of information on electronic communication platforms, 73 pieces of information on the Agency's website, and 81 pieces of information on the Facebook social network . (CHART).

The public image of the Agency in the media was positive, regardless of the fact that in 4 cases of the questions directed by the media, due to legal restrictions, the Agency could not provide the requested information. Reports in the media and non-governmental organizations were neutral and balanced in terms of cooperation and presentation of the Agency's scope of activity.

PUBLIC AWARENESS-RAISING ACTIVITIES

In order to inform public officials regarding compliance with the obligations set for the declaration of assets, the Agency prepared 3 TV spots: 1) Call for asset declaration, 2) Call for reporting corruption and institutional cooperation; 3) APC mandate. These have been broadcasted on the Public Radio Television of Kosovo (RTK).

As a result of cooperation with Non-Governmental Organizations, the Director of the Agency, supported by the American Embassy in Pristina on December 23, 2022, has signed a Cooperation Agreement in the

name of the Agency with Non-Governmental Organization AKTIV, which aims to raise public awareness about reporting corruption and launched a special mobile application for reporting corruption by non-majority community implemented within the project of the Bureau of International Narcotics and Law Enforcement Affairs (INL) "Enhancing Transparency and Rule of Law in Kosovo-Serb Majority Communities in Kosovo".

The extension of communication activities aimed at increasing the trust of citizens in the Agency has also resulted in four meetings being held with students as well as the participation of the Director of the Agency in four activities organized by Non-Governmental Organizations with the aim of involving youngsters in initiatives for the prevention and combating of corruption.

- The Director of the Agency hosted a meeting with the students of the IKD Legal Clinic and informed the latter about the process of declaration of assets by public officials and the actions of the Agency pending the completion of the verification of the information and the publication of the records of the annual declaration of assets.

REQUESTS FOR ACCESS TO PUBLIC INFORMATION

During the reporting period, the Agency received 25 requests for access to public documents, which were handled in accordance with the Law. No. 06/L-081 on Access to Public Documents.

Out of a total of 25 requests, in 23 cases, full access to information based on requests was granted, while in 2 cases, based on the legal provisions of the legislation in force, only partial access to information was granted.

| |
|---|
| Handling of requests for access to public documents during the period January-December 2023 |
| 25 requests received |
| 23 were granted full access to information, |
| 2 of them were granted partial access to information |

Profile of entities that requested access to public documents: 12 requests were received from the media, 10 requests were received from Non-Governmental Organizations, 2 requests were from private persons, and 1 request was received from another entity.

The nature of the requests for access was as follows:

1. Administrative documents- 13
2. Legal and sub-legal documents- 1
3. Statistics - 5
4. Other-6

REPORT WITH RESPECT TO THE HANDLING OF CASES OF EXTERNAL WHISTLEBLOWING

During the year 2023, a total of 20 cases were received and recorded.

As regards these cases, two cases are in the investigation procedure, while in 18 cases the administrative investigation procedure has been completed and their epilogue is as follows:

- 1 case, after having been handled in the framework of external whistleblowing, was forwarded as Information to the State Prosecutor's Office; it concerns an allegation or piece of information;

As regards the other allegation related to the received information, the case has been closed because it has been ascertained that there is not enough evidence to argue the reasonable suspicion for corroborating legal violations according to the law.

- 1 case was forwarded to the State Prosecutor's Office as information that concerns an allegation;

Whereas, as regards the other allegation related to the received information, the case is closed, because it turns out that the action or suspected practice reported through whistleblowing does not constitute a violation according to the law.

- 2 cases were forwarded to the competent body as requests for further proceedings;
- 1 case was rejected because the Agency considers that the reported information in relation to an allegation does not constitute a threat or violation of the public interest, which is protected in the sense of the provision of Article 5 of Law No. 06/L-085 on Protection of Whistleblowers, in conjunction with the provision of Article 3 paragraph 1, points 1.1 and 1.2. of this law.

Whereas, as regards the other allegation related to the received information, which concerns a conflict of interest, the case was handled by the Department for the Prevention of Conflict of Interest.

- 1 case was rejected, because it had initially to be handled within the institution through internal whistleblowing.

The Agency, through a letter, has addressed the employer of a certain public institution, whereby it has notified him of the obligation to carry out an administrative investigation of internal whistleblowing, based on Article 16 of Law No. 06/L-085 on Protection of Whistleblowers, in conjunction with Article 17 paragraph 4 of this law.

- 1 case was rejected to be handled as external whistleblowing because the allegation related to the information can be handled by the relevant departments in the Agency according to special laws and special procedures relevant to their handling.

The information has been forwarded to the competence of the Department for Prevention of Corruption, within the Agency, to be dealt with according to Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts.

- 7 cases have been rejected because not all the information or data that are foreseen to be filled in by the person reporting the information, according to Article 15, in conjunction with Article 3 paragraph 1, points 1.1 and 1.5 of Law No. 06/L-085 on Protection of Whistleblowers, based on which cases should be treated as external whistleblowing, have been confirmed.
- 3 cases have been closed, because it turns out that the action or suspected practice reported does not constitute a violation according to the law.
- 1 case has been rejected because the allegations raised exceed the legal competences and the real possibilities for their administrative investigation by the agency, and it has been confirmed that the same case is already being handled by the Basic Prosecution Office in Prishtina.

The Agency has provided written responses/notifications in 7 cases, related to information received from officials of various institutions who have requested information about whistleblowing, or from anonymous officials or persons who have tried to report information about any threat or violation of the public interest, but during the initial assessment and treatment of the report, it was ascertained that they do not meet the conditions to be treated according to Law No. 06/L-085 on Protection of Whistleblowers.

Information and capacity building for the Officer Responsible for Whistleblowing

In order to increase the capacities and practical knowledge of the officers responsible for the implementation of the local legal framework for the protection of whistleblowers, the Agency, with the support of the Project against Economic Crime (PECK III), the Council of Europe, and the OSCE Mission in Kosovo, has conducted five workshops related to “Whistleblowing, Administrative Investigation, the Role of Responsible Officers, and the Role of the Agency for Prevention of Corruption”, three of which were held during the month of October and two during the month of November. A total of 119 officers responsible for whistleblowing participated in these workshops, including officials from central institutions, local institutions, independent agencies, central public enterprises, and local public enterprises.

Also, in the course of the year 2023, the Agency has held meetings and contacts with the Officers responsible for whistleblowing within public institutions, with the aim of cooperation and coordination of practices and experiences, in function of the implementation of Law No. 06/L-085 on Protection of Whistleblowers.

Six-month whistleblowing report, 01 January - 30 June 2022

In order to monitor the dynamics of the implementation of Law No. 06/L-085 on Protection of Whistleblowers, through the email dated June 1, 2023, we have requested from the officers of public institutions responsible for whistleblowing to prepare a six-month report (January 1, 2023–June 30, 2023) related to whistleblowing and forward the same to the agency.

This report has been forwarded to the Agency by 149 public institutions, respectively 169 responsible officers (some public institutions that extend throughout the territory of the Republic of Kosovo have also appointed responsible officers in their regional units), while 33 public institutions, respectively 39 responsible officers, have not forwarded this report.

According to the received reports, it results that 36 cases were handled within the framework of internal whistleblowing. As regards the gender of the person reporting the information, 10 of them are female whistleblowers, while 21 are male.

ANNUAL REPORTS FROM PUBLIC INSTITUTIONS, PRIVATE ENTITIES, AND REGULATORS REGARDING WHISTLEBLOWING, JANUARY 1 - DECEMBER 31, 2023

Based on Article 29, paragraph 2 of Law No. 06/L-085 on Protection of Whistleblowers, the Agency receives from public institutions, private entities, as well as regulators the annual reports related to whistleblowing for the previous year until December 31.

In this respect, the Agency has reminded the officers of public institutions responsible for whistleblowing of their legal obligation in the sense of Article 29 of Law No. 06/L-085 on Protection of Whistleblowers, as well as Article 17 of Regulation No. 03/2021 on Determining the Procedures for Receiving and Handling the Cases of Whistleblowing, that as a public institution, they prepare the annual report related to the whistleblowing for the previous year by December 31 and present the same to the Agency by January 31 of the following year at the latest.

Therefore, pursuant to Article 29 paragraph 3 of Law No. 06/L-085 on Protection of Whistleblowers, the Agency publishes a general Annual Report on whistleblowing for the year 2023, according to which this report has been forwarded to the Agency by 156 public institutions, respectively, 183 responsible officers (some public institutions that extend throughout the territory of the Republic of Kosovo have appointed responsible officers in their regional units as well), and 2 private entities, while 23 public institutions have not submitted the report.

According to the received reports, it results that 84 cases were handled within the framework of internal whistleblowing. As regards the gender of the person reporting the information, 22 of them are female whistleblowers, 51 are male and 11 are anonymous reporters.

PUBLICATION OF THE NAME OF THE OFFICER RESPONSIBLE FOR RECEIVING AND HANDLING CASES OF WHISTLEBLOWING

Through an electronic letter, the Agency has addressed the Officers of Public Institutions responsible for whistleblowing, from whom it has requested that, in the sense of the implementation of the legislation on the protection of whistleblowers in Kosovo, in coordination with the leader of the institution, they make public the identity of the officer responsible for whistleblowing on the website of their institution, while institutions that do not have an official website, pending the creation of such a page, make the name of the official responsible for whistleblowing public at the premises of their institution, respectively on the notice board.

It is also requested that the Agency be notified of the publication of the name of the responsible officer on the website, and be promptly notified about any change of the name of the officer responsible for whistleblowing.

The number of Public Institutions that have informed the Agency regarding the publication of the identity of the officer responsible for whistleblowing on the institution's website and their institution's premises, respectively, on the notice board, is 144 in total.

The publication of the name of the officer responsible for receiving and handling cases of whistleblowing, by public institutions, has been carried out as follows;

- 121 on the institution's website;
- 4 of them have published the decision on the appointment of the officer responsible for whistleblowing, on the website of the institution;
- 16 on the notice board;
- 3 have of them notified the staff via email .

LESSONS LEARNED AND FUTURE PRIORITIES

The Management of the Agency during 2023 has also focused on improving transparency and institutional accountability by guaranteeing impartiality and equal treatment during the exercise of its field of activity. This has influenced the continued growth of trust in the agency through the increase in the number of reports on incorrect declaration of assets, reports from citizens, various interest groups, institutions, and the highest state officials on possible conflicts of interest, and possible corrupt actions in public procurement.

The sensitization of public officials in the field of prevention of conflict of interest has been the focus during 2023, where specialized training programs have been conducted for authorities responsible for conflict of interest. Strengthening awareness and increasing the integrity of public officials have influenced the number of cases reported for potential conflicts of interest to decrease in 2023. It remains the Agency's goal to raise the standard of responsibility and accountability of public officials so that they themselves address conflicts of interest during the decision-making process and the exercise of the official function and thereby avoid possible situations of conflict of interest on their own initiatives.

The profiling of the Agency in accordance with the new responsibilities and powers defined by the Law on the Agency for Prevention of Corruption and the Law on the Declaration of Assets has paved the way for the organization and systematization of job positions by enabling the distribution of human resources in full implementation of its legal mandate. The approval of new additional positions for the Agency will make possible the increase and strengthening of its professional expertise during recruitment.

The application of the electronic declaration system has simplified the process of declaration of assets and submission by increasing transparency and accuracy in monitoring and verifying declared assets. The installation of the online asset declaration system as a priority for the year 2023 has facilitated and brought advantages in the publication of the assets of high public officials by raising the accuracy of data and information related to the asset declaration to a higher level, thus avoiding the possible omissions that were made in the past. The publication of the asset declaration registers was done in an expedited manner and within the time limit, which obviously contributed to the increase of transparency in the declaration of assets by public officials.

The Agency has intensively improved its work in strengthening transparency, accountability, and information campaigns in order to inform the general as well as the professional public about the scope of the APC.

In the absence of the provision of services by the contracting company to respond to the agency's requests, as well as in the absence of professional information technology capacities within the agency for the publication of information and documents on the agency's website, during 2023 as well, there have been recorded deficiencies in the publication of information that were managed to be addressed in a timely manner.

Increasing professional capacity to raise the whistleblowing process to the desired public level, which would contribute to creating a climate in which whistleblowers will feel protected and motivated to report possible suspicions of corrupt affairs, is addressed through the process of organization and systematization of jobs in the Agency. It is of particular importance to understand that whistleblowing and whistleblower protection are mechanisms for preventing corruption that contribute to the overall strengthening of integrity in public and private sector institutions.

The Agency aims to strongly contribute to the prevention of corruption in Kosovo by strengthening its professional expertise and increasing its capacities, through assessing the risk of corruption in sensitive sectors, avoiding loopholes in legislation that enable corruption and monitoring integrity plans.

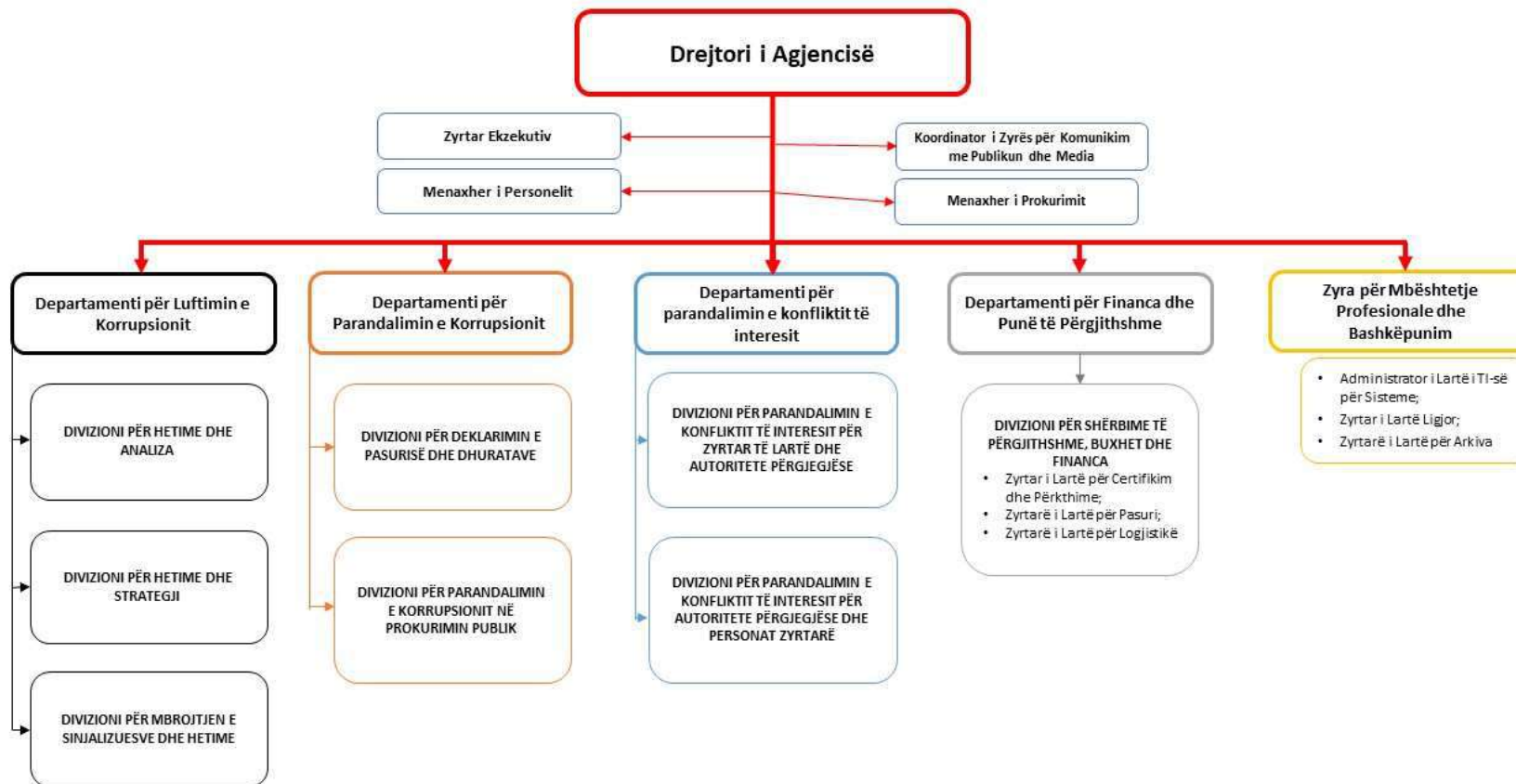
The demands and needs identified by the agency during the realization of the Agency's annual performance plan for 2023 have been supported by various partners through projects. The Agency intends to continue the strengthening of cooperation with those who support the work of the Agency.

In the future, increased attention will be paid to the digitalization of various processes carried out by the Agency during the exercise of its functions through the development of various platforms for easier communication and access. The training and professionalization of the Agency's staff, either the existing one or the one that will be recruited in the future, but also of all the Agency's contact officers in other

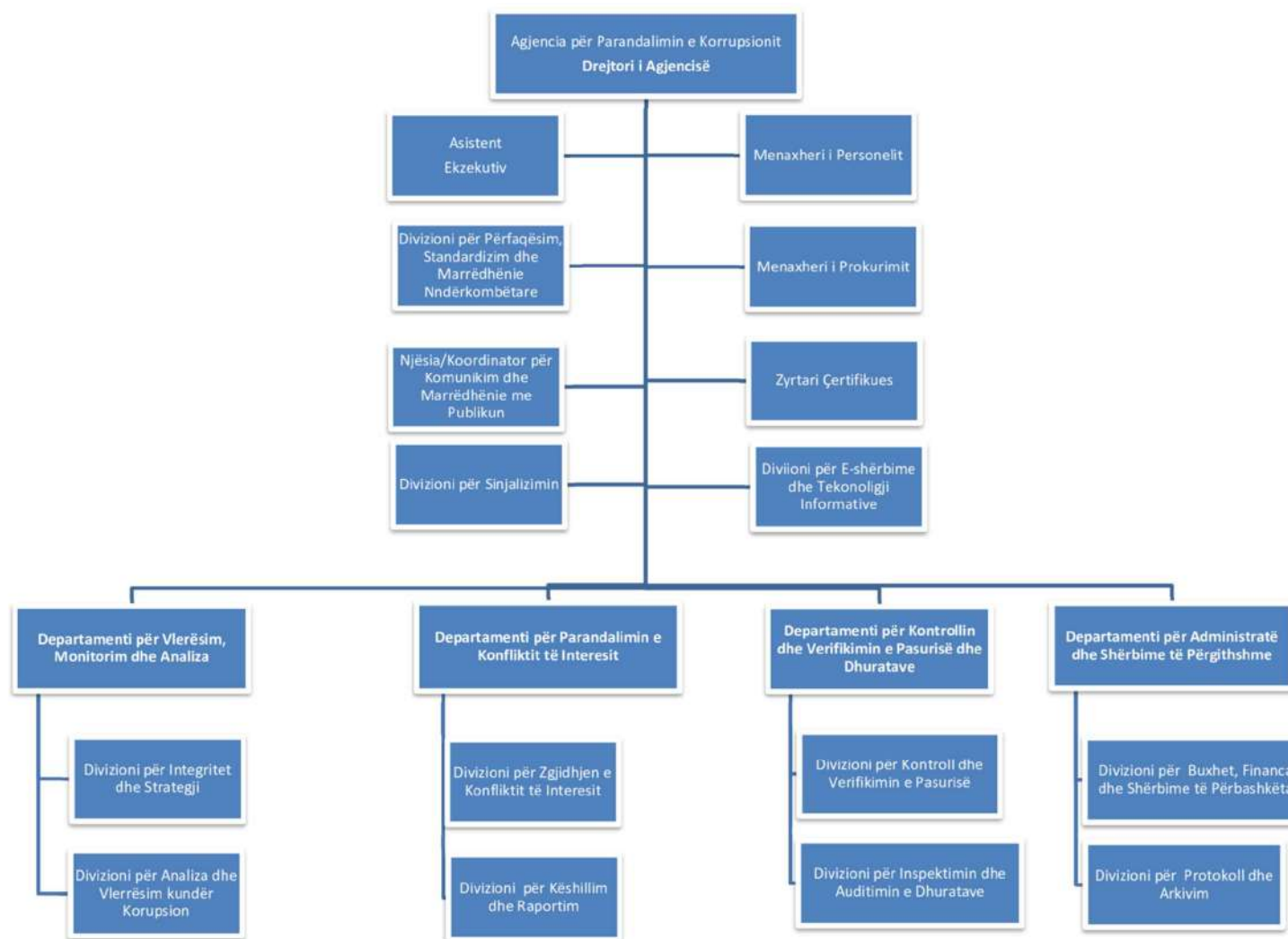
institutions that have certain legal responsibilities in relation to the Agency and not only of them, is of special importance.

Special emphasis from all the responsible institutions should start to be put on the strengthening of the authorities responsible for the prevention of conflict of interest and the officials responsible for the protection of whistleblowers through the creation of adequate working conditions for them, as well as for other contact officers of the agency in other institutions that have certain legal responsibilities in relation to the agency.

ANNEX NO. 1. OLD ORGANIGRAM OF THE AGENCY FOR PREVENTION OF CORRUPTION (APC)



ANNEX NO. 2. NEW ORGANIGRAM OF THE AGENCY FOR PREVENTION OF CORRUPTION (APC)



ANNEX NO. 3. LIST OF PARTICIPATION IN TRAININGS, FORUMS, SEMINARS DURING 2022

| No. | Type of Training | Organized by | Country | Date | Number of Participating Officers |
|------------|--|----------------------------------|----------------|------------------|---|
| 1. | Corruption Investigations in the Public Sector | US Embassy | Budapest | 23.01-04.02.2023 | 1 |
| 2. | Providing robust protection for employees who report violations | RAI | SARAJEVO | 31.01-02.02.2023 | 2 |
| 3. | Regulation on Internal Organization and Systematization of Jobs | APC | Tirana | 10-13.02.2023 | 10 |
| 4. | Contract Management through e-Procurement | KIPA | Prishtina | 13-14.02.2023 | 6 |
| 5. | Job Classification Process for Public Officials | MIA | Prishtina | 01.03.2023 | 1 |
| 6. | Processing and Protection of Personal Data | KIPA | Pristina | 14-15.03.2023 | 1 |
| 7. | Regional Forum Anti-Corruption Policies as a Guarantee for National Security, Stability and Sovereignty | SELDI and CSD | Bulgaria | 20-22.03.2023 | 1 |
| 8. | Fighting fraud with EU funds: Cooperation between OLAF and the authorities in the Western Balkans | European Anti-Fraud Office(OLAF) | Belgrade | 21-22.03.2023 | 1 |
| 9. | Contract Management | KIPA | Prishtina | 23-24.03.2023 | 6 |
| 10. | Training on TAX evasion and the informal economy | OSCE | Pristina | 28-29.03.2023 | 1 |
| 11. | Regional Event for Validation of Anti-Corruption Legislation for Higher Education Sectors and Public Enterprises | RAI | Belgrade | 04/05/2023 | 2 |
| 12. | The rights and duties of public officials and the Code of Conduct | KIPA | Prishtina | 04/07/2023 | 1 |
| 13. | Drafting of documents related to the declaration of gifts and review of new declaration positions according to the new law | APK SAEK III UNDP | Istog | 06-07.04.2023 | 9 |
| 14. | Budget execution and procedures in 2023 | KIPA | Prishtina | 19-20.04.2023 | 2 |

| | | | | | |
|-----|--|--|------------------------|----------------------|----|
| 15. | Investigations and Sanctions in the official supervision of political finances | IFES | Czech Republic | 18-21.04.2023 | 1 |
| | The functioning of the whistleblowing mechanism and its procedures | PECK III | Ireland | 25-28.04.2023 | 2 |
| 16. | The independent method of integrated investigation and the new method of operation for money laundering | OSCE | Prishtina | 08-10.05.2023 | 4 |
| 17. | Public Investment Program (PIP) and Budget Development Management System (BDMS), | KIPA | Prishtina | 05-09.06.2023 | 3 |
| 18. | Transposition of the EU Directive on Whistleblowing; Western Balkans Experience and Lessons Learned from the EU Member States of the South East Europe | Southeast European Coalition on Whistleblower Protection | Tirana | 12-13.06.2023 | 2 |
| 19. | Accounting and analytical skills in the integrated investigation of financial crimes | OSCE | Prishtina | 14-16.06.2023 | 2 |
| 20. | Recruitment project for senior positions | British Embassy | Prishtina | 17.06.2023 | 1 |
| 21. | Advanced training in public procurement and institutional integrity | OSCE | Prishtina | 19-20.06.2023 | 5 |
| 22. | Regional roundtable for monitoring and evaluation of anti-corruption review mechanisms of legislation | RAI | Bosnia and Herzegovina | 22-24.06.2023 | 1 |
| 23. | Presentation of the Updated Accounting Plan and Accounting Plan Guide | USAID | Prishtina | 30.06.2023 | 4 |
| 24. | Thirteenth Law Enforcement Network Meeting of Anti-Corruption Network for Eastern Europe and Central Asia | USAID | Kazakhstan | 04-09.09.2023 | 1 |
| 25. | Serbian language course | Prime Minister's Office | Prishtina | 04.09.2023 continues | 13 |
| 26. | Meeting with the Office of the Coordinator of OSCE Economic and Environmental Activities and the Federal Bureau of Anti-Corruption BAK | OSCE | Austria | 11-14.09.2023 | 3 |

| | | | | | |
|-----|---|---------------------------|--------------------|---------------|----|
| 27. | Increasing cooperation between Audit Institutions and anti-corruption bodies | UNODC | Prishtina | 12-14.09.2023 | 3 |
| 28. | Union and Recovery on Beneficial Ownership Transparency in Europe | IRI | Italy | 18-21.09.2023 | 1 |
| 29. | Study visit | APC | Montenegro | 20-22.09.2023 | 5 |
| 30. | Promotion and Education of Youth in the field of anti-corruption | UNOCD | Montenegro | 21-23.09.2023 | 2 |
| 31. | Accounting plan and accounting in KFMIS | KIPA | Prishtina | 26-27.09.2023 | 2 |
| 32. | The 22nd Istanbul Anti-Corruption Action Plan (IAP) Monitoring Meeting, and the 28th Anti-Corruption Network (ACN) Steering Group Meeting | OECD | France | 02-06.10.2023 | 2 |
| 33. | Drafting of the Integrity Plan for the APC | OSCE APC | Prizren | 04-06.10.2023 | 16 |
| 34. | Finalization of the Performance Plan for the APC for the year 2024 | APC | Tirana | 07-10.11.2023 | 10 |
| 35. | Regulation on Internal Organization and Systematization of Jobs | OSCE APC | Pejë | 15-17.11.2023 | 13 |
| 36. | Sharing Experiences on the Police Reform | KCSS | Tirana | 23-24.11.2023 | 2 |
| 37. | The current situation with regard to corruption in public procurement in the countries of the Western Balkans | Balkan Tender Watch | North Macedonia | 06-08.12.2023 | 3 |
| 38. | Preparing of the initial draft of the Regulation on Administrative Investigations | APC | Tirana | 08-10.12.2023 | 8 |
| 39. | Integrity Plan 2024-2025 MIA | MIA | Prizren | 07-09.12.2023 | 2 |
| 40. | Registration of Capital Assets in KFMIS | MoF | Prishtina | 14.12.2023 | 2 |
| 41. | The new Law on Public Officials and the use of HRMIS | MIA | Prishtina | 19.12.2023 | 1 |

List of declaring entities that have not respected the DRV asset declaration deadline:

| No. | Name | Surname | Job Position | Institution |
|-----|----------|---------|----------------------------------|---|
| 1. | Hamid | Zukaj | Municipal Assembly Councillor | Municipality of Deçan |
| 2. | Hekuran | Hoxha | Municipal Assembly Councillor | Municipality of Gjakova |
| 3. | Florin | Dreshaj | Municipal Assembly Councillor | Municipality of Istog |
| 4. | Kushtrim | Kozmaqi | Deputy Head of Division | Ministry of Education, Science and Technology |
| 5. | Nijazi | Halili | Member of the Scientific Council | Ministry of Education, Science and Technology |
| 6. | Daut | Demaku | External Political Advisor | Ministry of Agriculture, Forestry and Rural Development |
| 7. | Erleta | Qestaj | Municipal Assembly Councillor | Municipality of Junik |
| 8. | Arta | Shehu | Member of the Steering Board | "Hasan Prishtina" University in Prishtina |
| 9. | Fatlum | Sadiku | Political Advisor | Office of the Prime Minister of the Republic of Kosovo |
| 10. | Abdyl | Gashi | Municipal Assembly Councillor | Municipality of Novobërda |
| 11. | Vlora | Dumoshi | Parliament Member | Assembly of the Republic of Kosovo |

List of declaring entities that have not respected the DMD asset declaration deadline:

| No. | Name | Surname | Job Position | Institution |
|-----|---------|-----------|------------------------------|---------------|
| 1. | Ruzhdi | Zeneli | Chief | Kosovo Police |
| 2. | Ramadan | Miftari | Forensic Officer | Kosovo Police |
| 3. | Fatmir | Kamerolli | Investigator | Kosovo Police |
| 4. | Egzon | Abazi | Investigator | Kosovo Police |
| 5. | Sabri | Gashi | Supervisor | Kosovo Police |
| 6. | Faik | Sadiku | Investigator | Kosovo Police |
| 7. | Nenad | Stankovic | Investigator | Kosovo Police |
| 8. | Semir | Isufi | Intelligence Officer | Kosovo Police |
| 9. | Haxhë | Lekaj | Officer in the Evidence Room | Kosovo Police |
| 10. | Vera | Nikolic | Procurement Officer | Kosovo Police |
| 11. | Agim | Zymeri | Supervisor | Kosovo Police |

| | | | | |
|------------|-----------|---------------|--|--|
| 12. | Kadri | Kadriu | Chief | Kosovo Police |
| 13. | Besnik | Nika | Investigator | Kosovo Police |
| 14. | Ihsan | Fetahaj | Supervisor | Kosovo Police |
| 15. | Goran | Milisavljevic | Technical Control Inspector | Ministry of Environment, Spatial Planning and Infrastructure |
| 16. | Radisa | Tomovic | Transport Inspector | Ministry of Environment, Spatial Planning and Infrastructure |
| 17. | Vladimir | Tomovic | Road Infrastructure Inspector | Ministry of Environment, Spatial Planning and Infrastructure |
| 18. | Dejan | Radovic | Driving School Inspector | Ministry of Environment, Spatial Planning and Infrastructure |
| 19. | Muhamet | Kastrati | Veterinary Inspector | Food and Veterinary Agency |
| 20. | Strahinja | Stevic | Sanitary Inspector | Food and Veterinary Agency |
| 21. | Ivana | Zivic | Sanitary Inspector | Food and Veterinary Agency |
| 22. | Rrahman | Jashari | Member | Ministry of Education, Science and Technology |
| 23. | Petrit | Balia | Member of the Supervisory Council on Licensing of Immovable Property Assessors | Ministry of Finance |
| 24. | Osman | Halitaj | Tax Inspector | Tax Administration of Kosovo |
| 25. | Milenko | Milintijevic | Senior Customs Officer | Kosovo Customs |
| 26. | Agmet | Zejneli | Customs Officer | Kosovo Customs |
| 27. | Dejan | Stanojevic | Labour Inspector | Labour Inspectorate |