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AGJENCIA PËR PARANDALIMIN E KORRUPSIONIT
AGENCIJA ZA SPREČAVANJE KORUPCIJE
AGENCY FOR PREVENTION OF CORRUPTION



ANNUAL REPORT

JANUARY – DECEMBER

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AGENCY FOR PREVENTION OF CORRUPTION (APC)**ANNUAL REPORT****JANUARY – DECEMBER 2024**

The Agency for Prevention of Corruption (APC), as an independent and specialized body for the implementation of state policies for the prevention of corruption in Kosovo, in accordance with Article 15 of Law No. 08/L-017 on the Agency for Prevention of Corruption, presents its Annual Work Report for the period 01 January – 31 December 2024 to the Assembly of the Republic of Kosovo, specifically to the Parliamentary Committee on Legislation, Mandates and Oversight of the Agency against Corruption.

The Annual Report of the Agency for 2024 reflects the work of the Agency over the year, as well as an analysis of the Agency’s activities related to the implementation of activities based on the 2024 performance plan, comparisons with previous years and an analysis of actions related to the prevention of corruption concerning the implementation of the anti-corruption legal framework.

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EXECUTIVE SUMMARY

The Annual Report of the Agency for Prevention of Corruption for 2024 summarizes the actions related to efforts and achievements in the fight against corruption in all areas of its activity. Here are some of the key elements of the Report:

Focus on Corruption Prevention: The Agency focused its work and activities on preventing corruption and conflicts of interest. This includes the protection of whistleblowers, organizing the asset declaration process, and receiving gifts while performing official duties.

Review of Requests and Information: The Agency has continuously reviewed and addressed requests and information received from public institutions, anonymous reports, as well as requests from the media and civil society.

Professional Support for Institutions: The Agency provided support and professional expertise in the drafting of internal regulations on corruption prevention according to the requirements and needs of public institutions, mainly related to integrity plans and ethical issues.

Overview of the Agency's Work: The Report provides an overall summary of the work carried out during 2024, including activities and training programs to raise awareness regarding corruption prevention, including the creation of visual products and the handling of over 11,000 asset declaration records.

Implementation and Compliance with Legislation: The Report describes reforms in legislation and their implementation, which have influenced the strengthening of internal operating and control procedures for corruption prevention, including the drafting and approval of bylaws.

International Cooperation: The Report addresses international and regional cooperation, including meetings, memberships, study visits, training and information exchange with other international organizations and institutions.

Challenges and Priorities for the Future: The Report identifies the challenges faced by the Agency during 2024 and introduces plans and priorities for the future in the fight against corruption.

These elements provide a general overview of the efforts of the Agency for the Prevention of Corruption in 2024 and the challenges ahead in this area.

LIST OF ABBREVIATIONS

APC	Agency for Prevention of Corruption
KBRA	Kosovo Business Registration Agency
CRA	Civil Registration Agency
CC	Constitutional Court
BC	Basic Court
KIPA	Kosovo Institute for Public Administration
PIK	Police Inspectorate of Kosovo
KEK	Kosovo Energy Corporation
KJC	Kosovo Judicial Council
KPC	Kosovo Prosecutorial Council
KPCK	Criminal Procedure Code of Kosovo
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 Force
MESP	Ministry of Environment and Spatial Planning
MIA	Ministry of Internal Affairs
MoH	Ministry of Health
MTI	Ministry of Trade and Industry
POEPMU	Publicly-Owned Enterprises Policy and Monitoring Unit
EO	Economic Operator
OSCE	Organization for Security and Cooperation in Europe
PRB	Procurement Review Body
SPRK	Special Prosecution Office of the Republic of Kosovo
SPO	State Prosecution Office
BPO	Basic Prosecution Office
KCPSED	Kosovo Centre for Public Safety Education and Development
RAI	Regional Anti-Corruption Initiative
SAP	Strategy and Action Plan of the Agency for Prevention of Corruption
TI	Transparency International
UNDP	United Nations Development Programme
UP	University of Prishtina "Hasan Prishtina"
OPM	Office of the Prime Minister

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

LEGAL FRAMEWORK

The Agency for Prevention of Corruption is an independent and specialized body for the implementation of state policies for the prevention of corruption in Kosovo. Law No. 08/L-017 on the Agency for Prevention of Corruption defines the status and powers of the Agency for Prevention of Corruption regarding the imposition of measures and sanctions, with the aim of preventing corruption, strengthening integrity, and ensuring institutional transparency in the Republic of Kosovo, as well as monitoring the implementation of the national strategy.

The responsibilities of the Agency under Law No. 08/L-017 are as follows:

- Implementation of the Law on the Prevention of Conflict of Interest in Discharge of a Public Function, the Law on the Declaration, Origin and Control of Assets and Gifts, and the Law on the Protection of Whistleblowers, including Monitoring and preventing cases of conflict of interest and taking measures provided by the special law; Monitoring the declaration of assets; Monitoring the receipt of gifts related to the discharge of a public function and taking measures provided by law;
- Providing opinions regarding conflict of interest and monitoring gifts related to discharge of public function;
- Monitoring and taking necessary measures for the protection of whistleblowers.
- Taking action in the area of monitoring the Action Plan of the National Anti-Corruption Strategy, anti-corruption assessment of legal acts, corruption risk assessments and integrity plans, including:
- Providing professional and technical assistance, advice and support for initiatives aimed at being undertaken by institutions for the prevention of corruption;
- Providing 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 requested by these institutions or by decision of the Director of the Agency;
- Monitoring the implementation of the Anti-Corruption Strategy and its Action Plan;
- Cooperation with state institutions and civil society to raise public awareness on the prevention of corruption;
- Developing and monitoring the corruption risk assessment and providing opinions on legal acts for the purpose of alignment with international anti-corruption standards;
- Monitoring the implementation of the integrity plan of public institutions;
- Conducting administrative investigations and taking actions in cases falling within the Agency's competencies; Referring criminal charges to the State Prosecution Office or, in the case of administrative violations, forwarding the case to the competent administrative authority;
- Initiating minor offence procedures within its scope in accordance with the relevant applicable legislation and imposing fines and taking other measures in accordance with the applicable legislation.

INTERNAL ORGANIZATION

The Anti-Corruption Agency, during 2024, operated based on Regulation No. 01/2023 for the Organization and Systematization of Positions at the APC, which was later replaced by Regulation No. 07/2024 for the Organization and Systematization of Jobs in APC, approved in accordance with Regulation (QRK) No. 06/2024 on Classification of Positions in the Civil Service, according to the new internal organizational structure. ([Organizational Chart of the Agency](#)).

The Agency for Prevention of Corruption in 2024 operated with 43 employees/officials according to the new organizational structure divided into departments, divisions and units.

- The Department for Evaluation, Monitoring and Analysis is responsible for evaluating legislation in accordance with local and international anti-corruption principles and standards, as well as ensuring effective monitoring and proactive analysis of the implementation of integrity plans and the National Anti-Corruption Strategy. This Department consists of: 1. Anti-Corruption Analysis and Evaluation Division, and 2. Integrity and Strategy Division.
- The Department for the Control of Assets and Gifts is responsible for ensuring an effective system for the declaration and control of declared assets, as well as the declaration and inspection of gifts. This Department consists of: 1. Division for Control and Verification of Assets, and 2. Gift Inspection and Audit Division.
- The Department for the Prevention of Conflict of Interest is responsible for strengthening the integrity of the public sector and ensuring the performance of public duties in an objective, impartial and transparent manner in service of the public interest through the identification, prevention, management and resolution of conflicts of interest of officials. This Department consists of: 1. Conflict of Interest Resolution Division, and 2. Advisory and Reporting Division.
- The Department for Administration and General Services is responsible for ensuring that the Agency's organizational units have efficient administrative services, e-services and information technology support effectively. This Department consists of: 1. Division for General Services, and 2. Division for E-Services and Systems.
- The Budget and Finance Division is responsible for developing policies, legislation, strategic documents and guidelines in the area of financial management, procedures and documents related to the budget and budgetary expenditures, preparing and managing the budget and overseeing financial expenditures for all organizational units of the Agency.
- The Whistleblowing Division is responsible for ensuring the efficient functioning of mechanisms for reporting violations in the public sector, administrative investigation, and the protection of whistleblowers.

- The Division for Representation, Standardization and International Relations is responsible for ensuring adequate legal representation, the effective implementation of professional standards and the advancement of international cooperation.
- The Human Resources Management Unit is responsible for ensuring the effective management of human resources, through the development of procedures and services that contribute to achieving the institution's and employees' goals.
- The Procurement Officer is responsible for conducting procurement procedures and activities in accordance with the Law on Public Procurement.
- The Information and Education Officer is responsible for organizing, coordinating, leading and harmonizing activities related to educating and informing the public and media concerning the work, activities and operations of the Agency.

BUDGET

According to the Law on the Agency: The APC prepares the annual budget in accordance with the Law on Public Financial Management and independently decides on the use of the budget, in compliance with the relevant applicable legislation.

According to the Law Budget Appropriations, the Agency's budget for 2024 was €965,660.00. The final budget at the end of 2024 was €782,473.18. From the final budget, a total of €760,842.43 was spent, representing 97.25%.

The allocated funds were planned and managed according to the legal obligations defined by the Law on Public Financial Management, which met the institution's real needs.

At the request of the Ministry of Finance, Labour and Transfers at the end of 2024, specifically from the Department of Budget, to identify potential budget savings, the Agency identified possible budget savings in the following categories: Wages and Salaries, Goods and Services, Utilities and Capital Investments, which savings were not reflected in the final budget except for the Wages and Salaries category, which was reflected by a Government decision.

In 2024, the Agency began receiving revenues from the imposition of fines on declaring entities, as defined by law. The total non-tax revenue was €9,887.99.

Economic categories		Approved budget (initial)	Final budget After review	Total expenditures	% of realization based on the final budget
No.		a	b	c	d=(c÷b)
1	Wages and Salaries	739,694.00	556,507.18	556,507.18	100%

2	Goods and Services	123,466.00	123,466.00	112,697.66	91.27%
3	Utilities	8,500.00	8,500.00	3,120.09	36.70%
4	Non-financial assets	94,000.00	94,000.00	88,760.84	94.16%
5	Total	965,660.00	782,473.18	760,842.43	97.23%
	Receipts - Revenues	9,887.99			

Table No. 1 reflects the initial budget by economic categories, the final budget, expenditures, percentage (%) of realization and revenues.

Based on the budget allocations, after the allocation of funds in accordance with planning and contractual obligations, the procurement plan, as well as the internal activities of the institution, the cash flow plan has been prepared.

Wages and Salaries - The initial allocation in the Wages and Salaries category was €739,694.00, while the final budget was €556,507.18, with €556,507.18 spent, which represents 100% realization. The difference between the initial and final budget is due to the fact that the Agency was approved 15 new positions for the 2024 budget. With the approval of Regulation No. 07/2024 on Internal Organization and Systematization of Jobs in the Agency for Prevention of Corruption, according to the planned job positions, new recruitment positions were also announced as per the needs of the Agency's capacity-building. This process continued throughout the year.

Goods and Services - The allocated budget for the Goods and Services category was €123,466.00. There were no changes between the final and initial budget, while €112,697.66 was spent, which means the realization percentage of the budget was 91.27%. All expenditures from this category covered the Agency's needs for supplies and various services. According to the MFLT's request to identify possible savings, the Agency declared savings of €6,000.00; however, this was not reflected in the final budget.

Utilities - The allocated budget for the Utilities category was €8,500.00, while €3,120.09 was spent, which represents 36.70%. For this category, the Agency made payments for landline telephony, as other obligations arising from this category are covered by MIA.

According to the MFLT's request to identify savings in the Utilities category, the Agency declared €5,000.00 as savings; however, this was not reflected in the final budget.

Capital Investments - The budget allocated for the Capital Investments category for 2024 was €94,000.00 for the project **Regulation of the Agency's Server Room and Hardware and Software Development**. For this project, €88,517.50 was spent, which represents 94.16% of the budget. This project was fully completed during the year.

According to the MFLT's request to identify savings in the Capital Investments category, the Agency declared savings of €5,000.00; however, this was not reflected in the final budget.

Revenues - The Agency for Prevention of Corruption generated revenue from fines imposed during 2024, totaling €9,887.99.

No.	Economic categories	Final budget for 2024	Expenditures 2024	Final budget for 2023	Costs 2023	Final budget for 2022	Expenditures 2022
		a	b	c	d	e	f
1	Wages and Salaries	556,507.18	556,507.18	513,851.18	513,851.18	413,222.00	413,201.12
2	Goods and Services	123,466.00	112,697.66	114,056.00	101,110.04	114,056.00	112,242.13
3	Utilities	8,500.00	3,120.09	8,500.00	2,703.01	3,500.00	3,196.47
4	Non-financial assets	94,000.00	88,517.50	20,000.00	6,677.00	8,216.00	7,273.92
	Total	782,473.18	760,842.43	656,407.18	624,341.23	538,994.00	535,913.64

Table No. 2 reflects the budget allocation by economic categories and expenditures for the period 2022-2024.

ADDRESSING THE RECOMMENDATIONS OF THE NATIONAL AUDIT OFFICE (NAO)

During the financial audit for 2023, the overall assessment of the financial statements in all material aspects had a fair and accurate presentation. In the Audit Report for AFS of the APC, we had three recommendations, all of which have been fully implemented.

Recommendation 1 - related to ensuring the commitment of funds and issuing purchase orders before receiving goods and invoices in order to comply with procedures and avoid increasing outstanding liabilities.

In accordance with the received recommendations, the responsible officials have ensured that legal procedures are complied with, so there are no cases where invoices are received before funds are committed and purchase orders are issued.

Recommendation 2 - related to strengthening financial control to ensure all obligations are paid within the legal deadline of 30 days after receiving invoices.

The Agency prepares a monthly report on outstanding liabilities and reports to the Treasury. Cases where the invoice exceeded 30 days were rare and justified, as the responsible officials are committed to ensuring that all payments are made on time within deadlines.

Recommendation 3 - ensuring the registration of all assets in the respective ledgers of the budgetary organization.

The Agency has taken actions in line with the recommendations and has registered assets in the accounting ledgers.

Currently, we are in the process of being audited by the NAO and have not yet received the Audit Report for 2024.

PERSONNEL

The Agency has 43 employees, of whom 3 are on unpaid leave, with positions suspended in accordance with Law No. 08/L-179 on Public Officials. As part of the recruitment plan, several recruitment procedures were conducted and the following positions were filled: 1 middle-level managerial position, 4 lower-level managerial positions, 5 professional 1 positions and 4 professional 2 positions.

Additionally, 2 professional 1 positions were canceled and one professional 1 position failed.

Based on the tasks and responsibilities of human resource management, the plan for enhancing the professional capacities of the Agency's officials has been implemented and monitored. The Human Resources Management Unit managed all systems directly related to the HRMU's responsibilities, such as the Human Resources Management System. <https://hrmis.rks-gov.net/>, the Access Control system <https://svp.rks-gov.net>, the Archives system <https://smaed-online.rks-gov.net/> as well as the Payroll Management system <https://smp.rks-gov.net/>. Necessary data updates have been carried out for all these systems, including updating records in officials' files, all changes related to the salaries of APC officials, leave management and monthly reports on work attendance for all officials.

The Agency, in accordance with Regulation No. 06/2024 on Classification of Jobs in Civil Service, adopted Regulation No. 07/2024 on Internal Organization and Systematization of Jobs in APC. As a result, positions have been classified, redeploying officials to designated positions and all Appointment Letters have been amended to implement this Regulation.

[\(Annex No. 3. List of participation in trainings, forums and seminars within and outside the country in 2024\)](#)

PROCUREMENT

Based on the Procurement Plan for 2024, out of sixteen (16) planned procurement activities, fourteen (14) were conducted, while procedures for four (4) activities were not initiated. Within the procurement activities, requests for initiating procurement procedures were submitted to the CPA, purchase orders were issued in the KFMS and contract management was carried out. Additionally, during 2024, four (4) requests for initiating procurement activities, which were not included in the Procurement Plan, were submitted to the CPA, along with justifications for their exclusion from the Procurement Plan 2024. Of these, three (3) procurement activities were completed, while one (1) was cancelled.

MANAGEMENT OF INFORMATION TECHNOLOGY SYSTEMS AND E-SERVICES

During 2024, throughout the reporting period, the Agency undertook a digital transformation of its key work processes. In 2023, for the first time, we implemented electronic asset declaration through the e-Declaration platform, which is part of the Agency's electronic system, DMSA (Data Management System of the Agency), in 2024, we operationalized the platform for online reporting of suspected misuse cases, namely the "REPORT MISUSE" platform.

The Report Misuse platform, available at <https://raporto.rks-gov.net>, was developed during the reporting year and was implemented and hosted in December 2024. This platform was developed with the financial

support of the SAEK III Project, UNDP Seoul. With the Agency's goal of a Corruption-Free Kosovo, we developed this platform based on a similar platform in South Korea, the "Clean Portal", but adapted it to the Agency's mandate. The Report Misuse platform consists of two key components: a web portal for citizens to report misuse and a case management system where all reported cases will be processed electronically. Reporters will receive real-time updates on the progress of their cases through the platform. The platform reporting portal supports the submission of suspected cases in three languages, Albanian, Serbian and English, and allows reports in the following categories:

- Whistleblowing: enables reporting of whistleblower cases;
- Conflict of Interest: allows reporting of suspected conflicts of interest;
- Asset/gift declaration: supports reporting of suspected non-declaration or false declaration of assets or gifts by declaring entities; and
- Other: enables reporting of various other cases, which the Agency will then classify accordingly.

During the reporting year, we also improved the DMSA system, specifically the online declaration module at <https://e-deklarimi.rks-gov.net>, to facilitate and enhance asset declaration for declaring entities. This module enabled approximately 11 thousand declaring entities to submit their asset declarations online. From the DMSA system, we generated over 11,000 Asset Declaration Registers in 2024, all of which were published on the Agency's website, www.apk-rks.net. Further improvements and developments have been made to another module, the contact officials module, at <https://pikatekontaktit.rks-gov.net>, addressing shortcomings identified in the previous year. This module allows contact officials within institutions to register, remove, edit and manage declaring entities within their institution's list. Additionally, during the reporting year, we worked on developing a new module within the DMSA system, the Integrity Module, which will enable the digitalization of the development and management of Integrity Plans. The Integrity Plans module is expected to be fully operational in the first half of 2025.

Improvements and developments have also been made to the DMSA-CMS system for managing asset declaration cases. These improvements have enabled more efficient and seamless management of the verification and full control of declared assets.

During the reporting year, with funding from the British Embassy in Kosovo, a mobile application for whistleblowing was developed, which will be made available to the public in 2025. This application, named "Sinjalizo" (Agency for the Prevention of Corruption), will be available for download on both App Store (iOS) and Play Store (Android). It will facilitate the reporting of whistleblower cases, which will be directly linked to the whistleblowing module of the Report Misuse platform.

Another significant project aimed at improving the quality and security of the Agency's data was the redevelopment of the server room based on ISO standards. Through this project, which was completed during the reporting year, the Agency's data centre was reconstructed and upgraded, including IT equipment for data storage, monitoring, and management. Additionally, a new surveillance system was implemented, ensuring 24/7 monitoring of the Agency's premises.

Given the increase in the Agency's staff during the reporting year, new IT equipment such as computers and laptops were also procured for the personnel.

The following figure presents the number of IT projects, applications and e-services implemented by the Agency for 2022, 2023, and 2024.

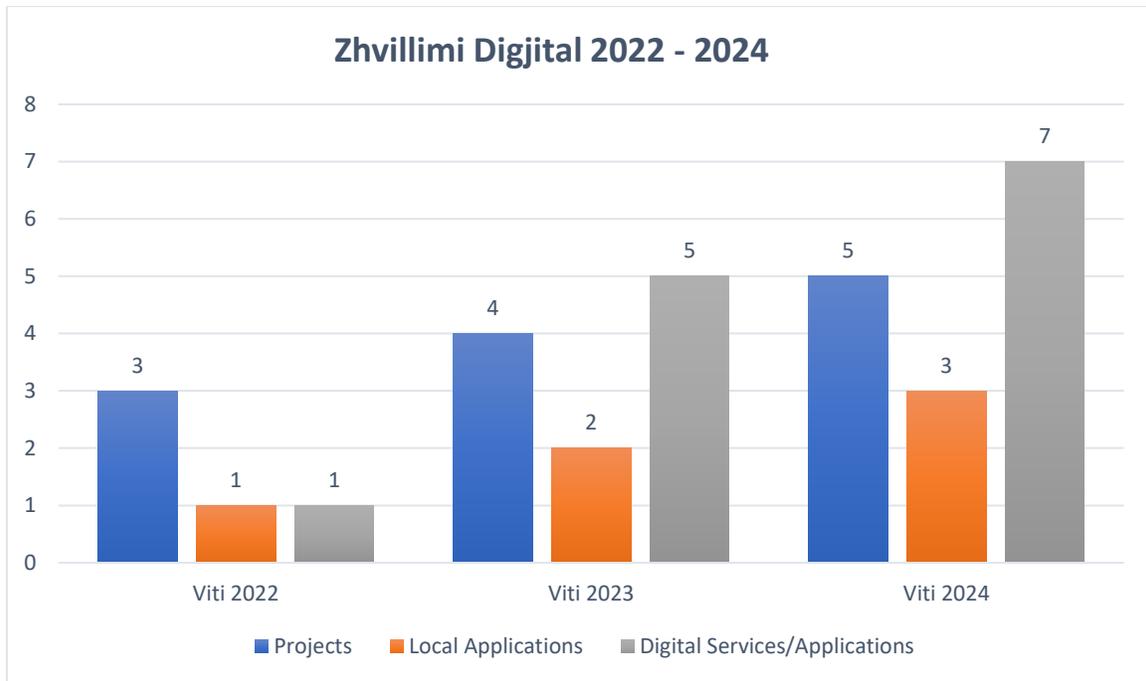


Figure 1. Graphical presentation of IT projects, applications and e-Services for the period 2022-2024

In addition to the successful implementations carried out in the digital transformation of the Agency, during the reporting year, the maintenance of existing systems and the computer network infrastructure continued successfully.

HANDLING CASES OF CONFLICT OF INTEREST

One of the key priorities of the Agency for Prevention of Corruption for 2024 was the prevention and management of conflict of interest situations. In this regard, the Agency has continued its duties and responsibilities and has taken all necessary measures to identify, prevent and manage such situations in accordance with Law No. 06/L-011 on Prevention of Conflict of Interest in Discharge of a Public Function.

During the reporting period from January to December 2024, a total of 220 cases were addressed.

Of the total number of cases, 67 cases were addressed based on external reports, 72 cases were initiated/handled upon request from institutions, 43 cases were initiated/handled upon the request of the officials themselves, 13 cases were reported by the media, 12 cases were reported by non-governmental organizations and 13 cases were handled ex officio.

Compared to previous years, specifically the last three years, in 2022 there were 233 cases, in 2023 there were 214 cases, and in 2024, there were a total of 220 cases.

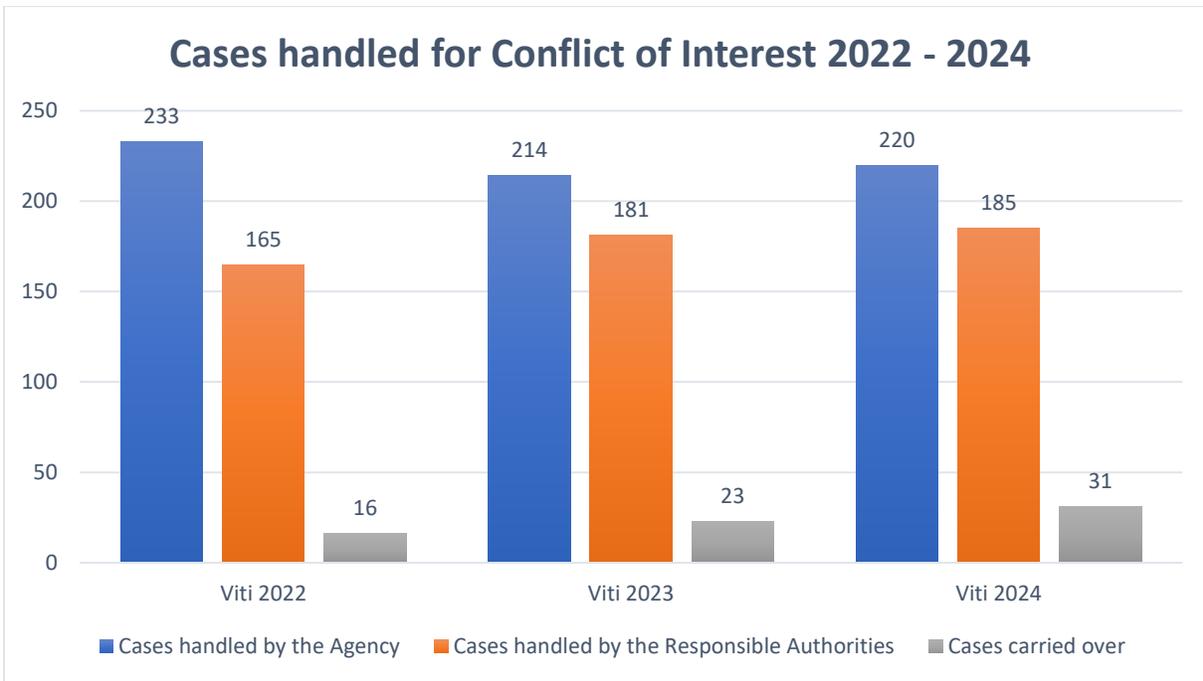


Figure 2. Graphical presentation of cases of conflict of interest handled in the period 2022-2024

ASSET DECLARATION

Asset declaration is an essential component for strengthening transparency and combating corruption in the public sector. The asset declaration process in 2024 was characterized by an increase in the responsibility of senior public officials to fulfil this legal obligation within the legal deadlines.

Referring to the declared data for the last three years: in 2022, out of 4748 declaring entities, 4687 (98.72%) declared their assets within the deadline, while 61 (1.28%) failed to meet the legal deadline, meaning they declared their assets after the deadline for asset declaration. In 2023, with the entry into force of Law No. 08/L-108, the number of declaring entities doubled and it was stipulated that declarations should be made electronically, ensuring a faster and more secure process. Therefore, in 2023, 99.60% of the declaring entities fulfilled their legal obligation for asset declaration, reflecting a significant increase in awareness and engagement. In 2024, considering the fact that Law No. 08/L-108 introduced two new categories of declaring entities (doctors and professors) for the first time, the goal was to increase responsibility and transparency to the public for these important occupations. According to the reported data, in 2024, out of 11168 declaring entities, 11070 (99.12%) respected the legal deadline, while 98 (0.88%) did not meet the deadline.

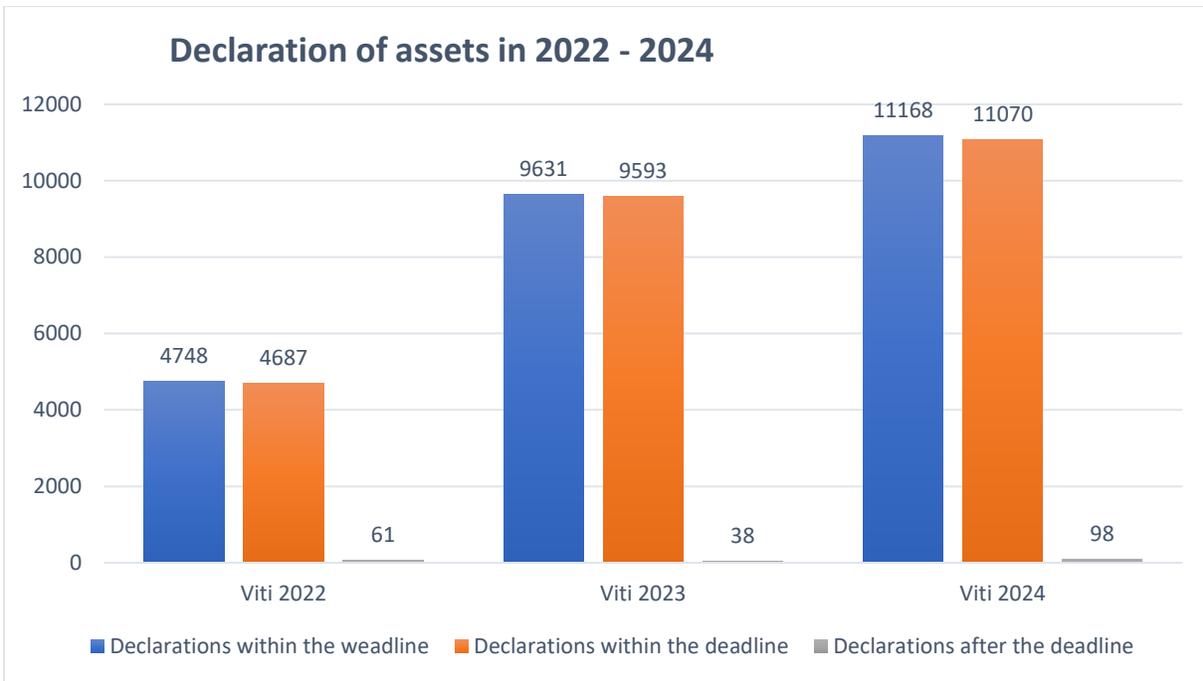


Figure 3. Graphical presentation of the asset declaration for the period 2022-2024

HANDLING OF WHISTLEBLOWING CASES

As part of the mandate of the Agency for Prevention of Corruption in overseeing and taking necessary actions according to Law No. 06/L-085 on Protection of Whistleblowers, in 2024, the Agency received and recorded a total of 48 external whistleblowing cases.

Compared to previous years, specifically the last three years: in 2022, there were 17 received cases, in 2023, 20 cases were received, whereas in 2024, 48 cases were received. This shows an increasing trend each year in the level of whistleblowing culture and the trust that citizens have in reporting suspicious or illegal activities, supported by the protection offered by the Law on Protection of Whistleblowers.

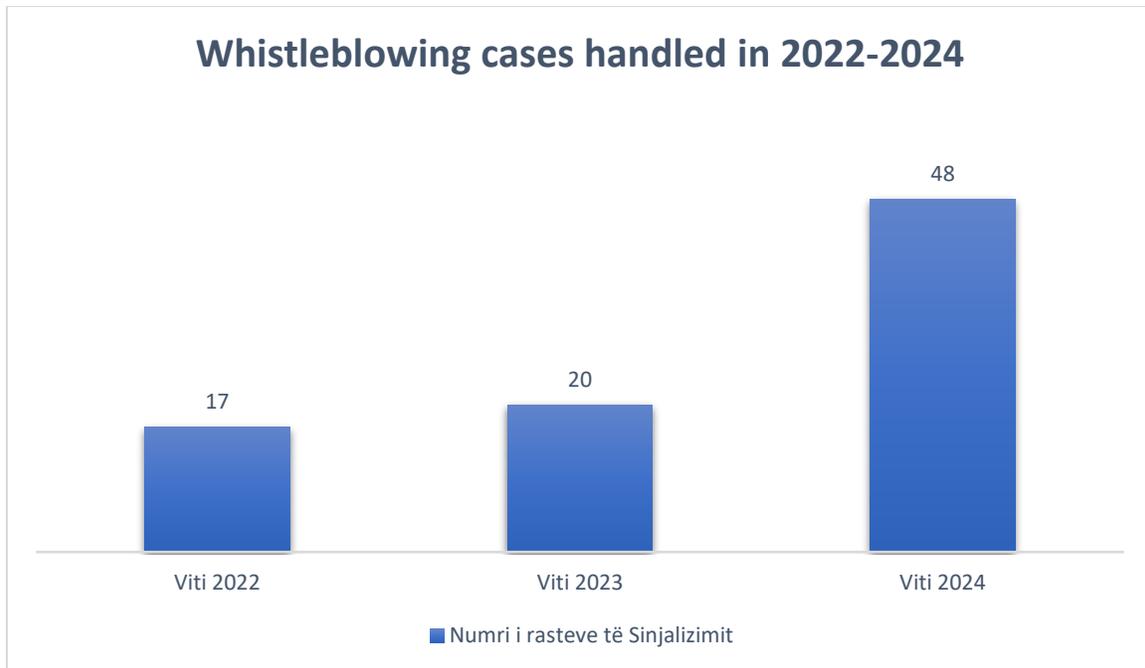


Figure 4. Graphical presentation of whistleblowing cases handled in the period 2022-2024

IMPLEMENTATION OF ANTI-CORRUPTION LEGISLATION AND ITS AMENDMENT AND SUPPLEMENTATION

During 2024, the Agency for Prevention of Corruption continued its mission towards the proper implementation and improvement of legislation through the approval of bylaws and important strategic documents, such as regulations, methodologies and practical guides. In doing so, the Agency fulfilled its obligations concerning the completion and full implementation of the applicable legislation. The activities of the Agency are based on the following laws:

- Law No. 08/L-017 on the Agency for the Prevention of Corruption;
- Law No. 08/L-108 Declaration, Origin and Control of Assets and Gifts;
- Law No. 06/L-011 on Prevention of Conflict of Interest in Discharge of a Public Function; and
- Law No. 06/L-085 on Protection of Whistleblowers;

In this context, the Agency continued to complete the legal framework, and approve bylaws and strategic documents as follows:

- Regulation No. 07/2024 on Internal Organization and Systematization of Jobs in the Agency for Prevention of Corruption;
- Regulation No. 06/2024 on the Imposition of Fines and other Sanctioning Measures by the Agency for Prevention of Corruption;
- Regulation No. 08/2024 on the Rules of Procedure of the Agency for Prevention of Corruption;
- Regulation on the Management of the Agency for Prevention of Corruption;

- Regulation No. 05/2024 on the Acceptance and Registration of Gifts by Public Officials;
- Rules 01-2024 on the Management of non-financial Assets in the APC;
- Code of Ethics and Conduct for Officials of the Agency for Prevention of Corruption;
- Guidelines for Monitoring and Reporting on the Implementation of the Integrity Plan;

Depending on the needs and various legal requirements, numerous legal submissions (decisions, requests, responses, contracts, memorandums of understanding) have been prepared. Additionally, various responses, opinions and professional advice have been provided to all organizational units within the institution for analyzing different issues within the institution's mandate and other activities falling under the Agency's competences and responsibilities.

CASES REFERRED BY THE AGENCY TO LAW ENFORCEMENT AUTHORITIES (PROSECUTION OFFICES AND COURTS)

During the reporting period, the Agency referred a total of 9 criminal reports to the competent justice authorities, namely the State Prosecutor/State Prosecution Offices and Courts for further legal proceedings, 34 informations to the State Prosecutor as well as 3 other cases to the Minor Offense Court. 8 criminal reports relate to actions sanctioned under Article 430 of the Criminal Code No. 06/L-074 of the Republic of Kosovo, "Failure to report or falsely reporting property, revenue/income, gifts, other material benefits or financial obligations", whereas 1 criminal reports are related to actions under Article 417 of the Penal Code, addressing the criminal offence of "Conflict of Interest".

3 cases referred to the competent Minor Offense Court are related violations of the provisions of Law No. 06/L-011 on Prevention of Conflict of Interest, which constitute a minor offence.

Furthermore, in the course of whistleblowing from the Agency, 3 cases have also been referred to as information, due to reasonable suspicion that there were elements of criminal offences and at the same time to assess whether there is sufficient evidence or if additional evidence needs to be obtained, in order to continue with other further legal procedures.

2 cases in the Minor Offense Court, where the whistleblower reports were not received and handled according to legal obligations, two because measures were taken against the whistleblowers, in violation of the Law on Protection of Whistleblowers and in one case where the respective institution failed to fulfil the legal obligation to appoint the Responsible Officer.

STATISTICAL INFORMATION ON DECISIONS CONCERNING CASES REFERRED BY THE AGENCY

From the information received during 2024, from the respective Courts regarding suspected corruption cases according to indictments filed by the competent Prosecution Offices based on criminal reports from the Agency, 17 judgments of conviction, 8 judgments of acquittal and 2 rejection rulings (dismissal of indictments) were issued.

No.	Court	Judgment of conviction	Judgment of acquittal	Rulings
1	BPO Prishtina	8	7	2
2	BPO Prizren	1	-	-
3	BPO Gjilan	2	-	-
4	BPO Gjakova	3	-	-
5	BPO Mitrovica	3	1	-
TOTAL		17	8	2

Table No. 3 reflects data from court decisions related to Article 437 of Criminal Code of Kosovo No. 04/L-082, respectively 430 of the Criminal Code of Kosovo No. 04/L-082.

By judgments of conviction, the Courts have primarily imposed fines, and in some cases, suspended sentences (fines and imprisonment), as well as effective imprisonment sentences were ordered.

Fines were imposed in amounts ranging from 250 Euro to 1000 Euro. These fines are required to be paid mainly after the finalization of the judgments, and in some cases, in instalments, with the possibility of revocation to a prison sentence, where 20 Euro will be counted as one day of imprisonment if the accused fails to pay, and the same cannot be enforced by obligation.

Suspended sentences have primarily been imposed with imprisonment sentences ranging from 3 to 10 months, with a verification period of up to 1 year.

There are cases where the Court imposed effective imprisonment sentences, which, through agreements between the Courts and the convicted individuals, have been replaced with fines.

Judgments of conviction refer to the criminal offence under Article 437 of the Criminal Code of Kosovo No. 04/L-082, specifically Article 430 of the Criminal Code of Kosovo No. 06/L-074, where 9 cases are related to failure to declare assets according to paragraph 1 of this Article, specifically 6 cases for failure to regularly declare annual assets and 2 cases for failure to declare upon termination/removal from office, and 1 case for failure to declare upon assuming office or position, as well as 8 cases for false asset declaration or failure to present requested data in the declaration according to paragraph 2 of this article, specifically 2 for failure to accurately declare annual income, 3 for failure to declare business (ownership of shares in a business organization), 1 for failure to accurately declare movable property (vehicle), and 2 for failure to accurately declare immovable property.

By judgments of acquittal, the Court acquitted the defendants in 4 cases for failure to declare assets according to paragraph 1 (2 cases for failure to declare annual assets regularly and 2 cases upon assuming office or position), 4 cases for failure to declare assets according to paragraph 2 (1 case for failure to declare movable property (vehicle) and 3 cases for failure to declare immovable property).

By rejecting rulings, the Courts decided on the following cases: 1 case for failure to declare assets upon assuming office or position and 1 case for failure to declare business (ownership of shares in a business organization).

REPRESENTATION OF CASES BEFORE THE COURTS

In 2024, the Agency represented a total of 31 cases initiated before justice institutions. All cases were of a criminal nature, with the Agency representing 27 cases before the Courts and 4 cases before the Prosecution Offices. The criminal offences for which the Agency has provided representation before the Courts and the Prosecution Offices pertained to: "Failure to report or false reporting of assets, income, gifts or other material benefits", pursuant to the Criminal Code of Kosovo.

The Agency's representation before the competent Courts and Prosecution Offices has taken place at various stages, depending on the phase of the proceedings in the respective cases.

PREVENTION OF CONFLICT OF INTEREST IN THE DISCHARGE OF PUBLIC FUNCTIONS

Within its mandate in the area of preventing conflicts of interest in the discharge of public functions, the Agency has continued its work during the reporting period by fulfilling its duties and responsibilities in accordance with the law. It has undertaken all necessary administrative investigative actions to address cases of conflict of interest. As a result, depending on the nature of the cases handled, the Agency has issued recommendations, advice, opinions and concrete decisions pursuant to the provisions of Law No. 06/L-011 on Prevention of Conflict of Interest in Discharge of a Public Function.

The prevention of conflict of interest in the discharge of public functions within public institutions in the country has also been carried out in cooperation with the responsible authorities in public institutions. To this end, the Agency has continuously provided professional support to better prepare these institutions in identifying, addressing and resolving situations of potential conflict of interest within their respective structures.

The Agency's actions for the reporting year were conducted objectively, impartially and professionally, in compliance with the applicable legislation. This process is typically carried out through the initiation of cases ex officio, based on information received from natural or legal persons, anonymous reports and public sources. The aim is to prevent conflicts of interest in public institutions and to strengthen institutional integrity and transparency in the Republic of Kosovo.

During the reporting period from January to December 2024, a total of 220 cases were submitted in relation to the prevention of alleged conflicts of interest.

Of the total number of cases, 67 cases were handled through external reporting, 72 cases were initiated/handled upon request from institutions, 43 cases were initiated upon request of the officials themselves, 13 cases were based on media reports, 12 cases were submitted by non-governmental organizations and 13 cases were initiated ex officio.

Compared to previous years, specifically the last three years, during the reporting period from January to December 2024, the Agency maintained a similar pace in handling cases related to the prevention of conflict of interest, particularly in providing responses to specific situations involving suspicions of incompatibility or the exercise of functions under conditions of conflict of interest.

Regarding the number of cases submitted in previous years, in 2022 there were 233 cases, in 2023 there were 214 cases and in 2024 there were 220 cases.

The outcomes of the cases handled by the Agency during the reporting period are as follows: In 134 cases, advice and opinions were provided, in 15 cases, the entities involved avoided conflicts of interest, 36 cases were found not to involve a conflict of interest, 1 case was referred for further proceedings to the State Prosecution Office, 3 cases were referred to the competent court for minor offences and 31 cases were carried over to the following year.

Of the 220 cases handled, 54 were initiated ex officio, 8 cases were addressed based on media reports and 2 cases were referred by non-governmental organizations.

It is important to highlight that, in addition to the aforementioned reports and requests concerning allegations of conflict of interest, the Agency also received 13 cases for final conflict of interest assessment from law enforcement authorities, including the State Prosecution Police and the Kosovo Police.

Institution	Cases handled	Cases of avoided CI	Cases without CI	Cases before the court	Cases before the Pros Office	Opinions Responses	Cases in procedure
Assembly of Kosovo	3	0	1	0	0	1	1
Government (Min. Agen. (Uni.))	85	3	15	1	0	56	10
Courts	3	0	0	0	0	3	0
Prosecution Offices	5	0	0	0	0	5	0
Independent Institutions	34	0	6	0	0	23	5
Publicly Owned Enterprise	35	3	4	1	1	19	7
Local Government	55	9	10	1	0	27	8
Total	220	15	36	3	1	134	31

Table No. 4 reflects the cases handled by the Agency during 2024

Furthermore, pursuant to Law No. 06/L-011 on Prevention of Conflict of Interest, specifically Article 20 of the Law, concerning the legal obligations related to addressing conflicts of interest by the responsible authorities within public institutions, including the direct superiors of officials according to the institutional hierarchy, 2024 was characterized by a relatively consistent trend in the number of cases handled by the responsible authorities within public institutions.

In this regard, compared to the past three years, there has been a year-on-year increase in the number of cases handled by responsible authorities, as follows: in 2021, responsible authorities handled 101 cases, in 2022, they handled 121 cases, in 2023, they handled 181 cases, and in the reporting year, a total of 185 cases were handled by responsible authorities.

Institution	Cases submitted to the Agency	Cases of avoided CI	Cases without CI	Conflict of interest cases/disciplinary procedure	Opinions Responses	Cases in procedure	Cases submitted to APC
Presidency	0	0	0	0	0	0	0
Assembly of Kosovo	1	0	0	1	0	0	0
Government (Min. Agen. (Uni.))	82	31	21	4	14	1	11
Courts	16	10	6	0	0	0	0
Prosecution Offices	0	0	0	0	0	0	0
Independent Institutions	55	44	5	1	2	0	3
Publicly Owned Enterprise	9	8	0	0	0	0	1
Local Government	22	22	0	0	0	0	0
Total	185	115	32	6	16	1	15

Table No. 5 reflects the specifics of the cases handled by the Responsible Authorities during 2024

Beyond this, in the interest of preventing conflicts of interest, in 2024, the Agency also provided 79 responses via official electronic communication (email) to public officials and institutions based on their requests.

Activities to strengthen and empower responsible authorities

To enhance inter-institutional cooperation in the area of conflict of interest prevention, the Department for the Prevention of Conflict of Interest conducted several visits to key public institutions in 2024. During these visits, meetings were held with senior managers of these institutions and the responsible authorities appointed for preventing and resolving conflicts of interest within these institutions.

In these individual meetings, officials from the Department for the Prevention of Conflict of Interest within the Agency for Prevention of Corruption were informed of the challenges and efforts undertaken by institutions such as CBK, NAO, Constitutional Court, University of Prishtina, to identify and address as early as possible cases of conflict of interest within their respective institutions.



Additionally, during the activities organized by the Agency for Prevention of Corruption as part of Anti-Corruption Week, the Department for the Prevention of Conflict of Interest held a full-day main event with panellists and participants (responsible authorities from institutions), discussing the topic: *“Preventing conflict of interest - a prerequisite for trust in institutions”*.

ANALYSIS:

The number of requests for addressing conflicts of interest and incompatibilities in the discharge of public functions remains high. This is due to the fact that, during the reporting year, there have been movements through elections and appointments to managerial positions in public institutions and enterprises in the country. Additionally, the Agency for Prevention of Corruption is now perceived and recognized externally as a credible institution for assessing and addressing suspected conflict of interest situations.

On one hand, the high number of requests for handling suspected conflicts of interest reflects the continuously increasing trust and willingness of public officials and citizens to address conflict of interest issues with the Agency as the specialized institution for dealing with this matter. On the other hand, what remains concerning for the Agency is the fact that, despite awareness campaigns, advisory sessions and continuous training provided by the Agency for responsible authorities, there is still a noticeable hesitation among them. Public officials or their direct supervisors fail to initially assess such situations themselves, as required by law and resolve them within their institutions, seeking the Agency's involvement only in exceptional or specific cases where it is necessary.

It should also be noted that, during this reporting year, 11 requests were referred to the Agency through the Kosovo Police for addressing conflict of interest in cases reported and initiated directly by various Prosecution Offices or by the Kosovo Police itself.

Regarding the nature and characteristics of the decisions issued by the Agency in 2024, there have been decisions of various types, always aiming to prevent decision-making with conflicts of interest or incompatibilities in the discharge of public functions.

E.g.

- Following a decision confirming a conflict of interest in decision-making, an employment contract at the General Hospital in Mitrovica was annulled and a sanctioning measure was imposed on the official.
- Through an Agency decision, a recruitment process in the Municipality of Shterpce was annulled due to employment selection in violation of the post-employment restrictions under Article 18 of the Law on Prevention of Conflict of Interest.
- At the University of Prishtina, in two cases, decision-making occurred under conditions of a conflict of interest. Following an administrative investigation, the Agency requested that these cases be reconsidered, while in another case, disciplinary proceedings were initiated due to the failure to avoid a conflict of interest.
- In response to the party concerned, the Agency confirmed a conflict of interest regarding the appointment/election of a member of the Kosovo Prosecutorial Council, leading to the individual's resignation from the position.
- Due to incompatibility in discharging a public function, a Member of the Board of a local public enterprise resigned, as he continued to hold a managerial position in an NGO.
- Following the Agency's decision confirming a conflict of interest, an administrative act related to employment under conditions of conflicted decision-making was annulled at the Kosovo Energy Corporation.
- The opinion of the Agency for Prevention of Corruption resulted in the annulment of a recruitment process for a director's position within MCYS.
- The Agency's opinion led to changes in the composition of an evaluation committee in a public procurement process at the Ministry of Health.
- A clarification response was issued to prevent a conflict of interest in the selection process of members of the Kosovo Academy of Sciences and Arts.
- An opinion was issued regarding measures to prevent conflict of interest by the oversight body of an independent Agency.

Below is a summarized overview of actions taken against senior public officials to avoid conflict of interest in the discharge of public functions:

- **13** resignations from managerial positions in Non-Governmental Organizations;
- **3** resignations from managerial/executive functions and/or as an authorized person in private businesses;
- **1** resignation from a public function due to incompatibility with another public function;
- **1** resignation from an evaluation committee for public procurement processes;
- **1** disciplinary procedure initiated within the relevant institution against an official;
- **1** case initiated with a criminal report;
- **2** court decisions imposing fines on senior officials.

DECLARATION BY TYPE

Based on the legal obligations outlined in Law No. 08/L-108 on the Declaration, Origin and Control of Assets and Gifts, the Agency continued to oversee the assets of declaring entities as reported in the Regular Annual Declaration, the Declaration upon Taking Office, and the Declaration upon Termination or Dismissal from Office.

Regular Annual Declaration – Senior public officials are required to submit a regular annual declaration of assets each year throughout their tenure in public service, within the deadlines set by law. They are obliged to declare their asset status to the Agency for Prevention of Corruption (APC) from 1 March to 31 March of each year, covering the previous year from 1 January to 31 December. For 2024, a total of **7906** declaring entities were required to submit their declarations.

Out of this total, **7816** have declared their assets, while 90 declaring entities failed to submit their asset declarations within the deadline.

List of Regular Annual Declarations by Institutions

Institutions	Officials obliged to declare assets	Declared	Not declared
Presidency	19	19	0
Assembly	150	150	0
Government	4673	4606	67
Courts	529	528	1

Prosecution Offices	233	233	0
Independent Institutions	738	734	4
Municipalities e Kosovo	1079	1063	16
Publicly Owned Enterprise	485	483	2
TOTAL	7906	7816	90

For the reporting period January-December 2024, the overall status of the regular annual asset declaration process is presented in the following table, including comparisons with 2022 and 2023.

Years	Obligated to declare	Declared within the deadline	Failed to comply with the deadline
2022	4748	4687 (98.72%)	61 (1.28%)
2023	4709	4698 (99.77%)	11 (0.23%)
2024	7906	7816 (98.86%)	90 (1.14%)

Table No. 6. Comparisons for 2022-2024 regarding the regular annual asset declaration process

Declaration upon assuming office – Senior public officials who commence their duties in public service are required to fully and accurately declare their assets within the legal deadline of 30 days from the date of assuming office.

During the reporting year, newly categorized declaring entities were also obliged to declare their assets for the first time. A total of **3161** individuals were obliged to declare their assets, of whom **3153** complied within the deadline, while **8** failed to do so within the legally prescribed deadline.

For the reporting period from January to December 2024, the overall status of the asset declaration process upon assuming office is presented in the following table, including comparisons with 2022 and 2023.

Years	Obligated to declare	Declared within the deadline	Failed to comply with the deadline
2022	270	229 (84.82%)	41 (15.18%)
2023	4377	4350 (99.38%)	27 (0.62%)
2024	3161	3153 (99.74%)	8 (0.26%)

Table No. 7. Comparisons 2022-2024 regarding the declaration process upon taking office

Declaration after the termination or removal from office – Upon the completion of their engagement in a public position, public officials are required to declare their assets within a thirty (30) day period.

During the reporting year, the Agency received information from contact officials that **101** declaring subjects have concluded their public office functions and are obliged to declare their assets after leaving the public office.

For the reporting period of January-December 2024, the overall status of the asset declaration process after the termination of the public function is presented in the following table for 2022, 2023, and 2024.

Years	Obligated to declare	Declared within the deadline	Failed to declare within the deadline
2022	107	89 (83.18%)	18 (16.82%)
2023	545	545 (100%)	0 (0 %)
2024	101	101 (100%)	0 (0 %)

Table No. 8: Comparisons 2022-2024 regarding the asset declaration PROCESS after termination of public function

In the context of enforcing the law and taking measures for non-compliance with the legal obligations for the regular asset declaration, the declaration upon assuming office and the declaration after termination of public function, in 2023 the Agency continued further investigation in administrative procedures for 1716 cases.

Based on the data reported during 2024, for all types of asset declarations, a total of 11168 senior public officials were obliged to submit their declarations, as shown in the table below.

Type of declaration	Obligated
Regular annual declaration	7906
Upon assuming office	3161
After termination or removal from office	101
Total number	11168

Table No. 9 reflects the data regarding the asset obligations of senior public officials by type of declaration

According to Law No. 08/L-017 on the Agency for Prevention of Corruption, Law No. 08/L-108 on the Declaration, Origin and Control of Assets and Gifts, Regulation No. 06/2024 on the Imposition of Fines and other Sanctioning Measures by the Agency for Prevention of Corruption, and in accordance with the provisions of Law No. 05/L-087 on Minor Offenses, during 2024 the Agency imposed fines on 89 declaring entities, amounting to a total of €21,806.15, imposed the measure of “public reprimand” on 7 declaring entities, and terminated the procedures for 2 declaring entities due to their passing away.

ASSET CONTROL

According to Law No. 08/L-108 on Declaration, the Agency conducts a review of the asset declaration forms submitted by declaring entities. APC carried out full control of the asset declaration forms submitted by the declaring entities. Throughout the period, the Agency was committed to handling cases within the prescribed deadlines. However, due to technical issues related to the conduct of the control through the electronic system DMSA-CMS, the full control began late in 2023. The process of collecting information from relevant institutions to verify the declared assets by the declaring entities in the Agency had only just started. In 2024, all cases of full control have been carried over to 2025 due to staff shortages and the high volume of work during the year and as a result, the review has commenced late. In 2023, 1,708 cases were carried over for 2024 according to the control list, and 8 cases were received based on information, totalling 1716 cases.

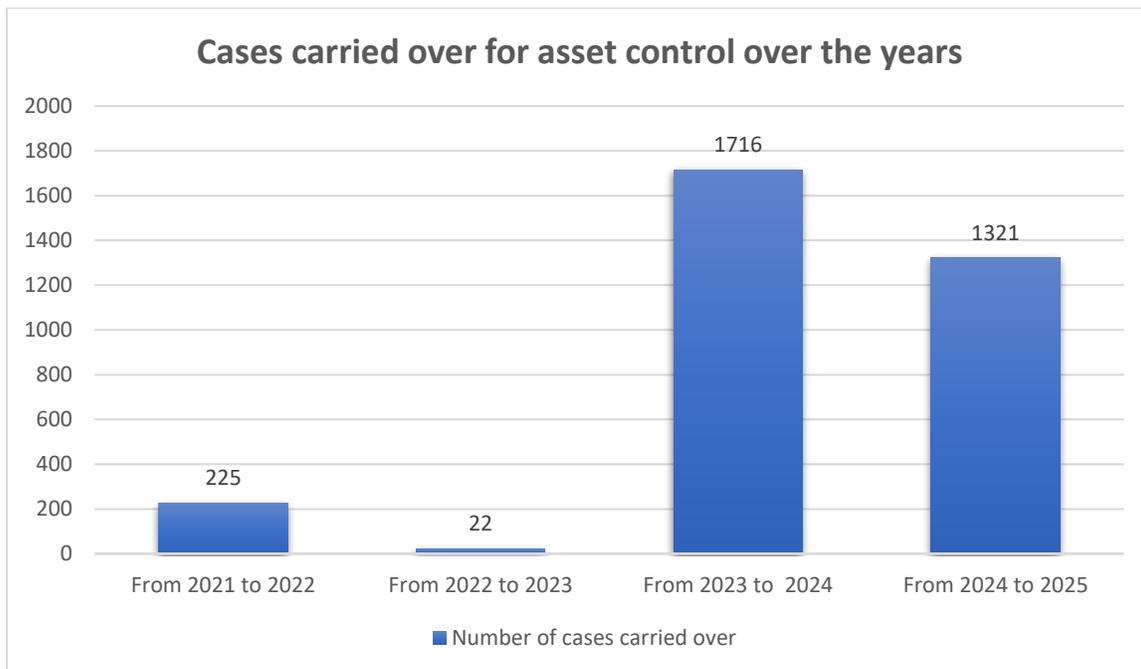


Figure 5. Graphical presentation of the carried-over cases for asset control over the years

Full control – Based on legal obligations, the Agency carried out full control of the assets to verify the accuracy and authenticity of the data declared in the asset declaration forms for public officials who declare their assets.

The asset control for the declaring entities was carried out according to the categorization defined by Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts. All declaring entities from Article 4, paragraph 1.1 to paragraph 1.18, as well as declaring entities from paragraph 1.19 to paragraph 1.38, one-

third of the declaring entities were subjected to a control selection by lot. Declaring entities who, according to Article 5 of the Law, declared their assets for the first time – 50 of them were subjected to a control selection by lot.

The full asset control process began by comparing the data declared over the years and by comparing the data received from other institutions such as the Business Registration Agency, Kosovo Cadastral Agency, Ministry of Finance - Property Tax Department, Treasury, Publicly-Owned Enterprises, Civil Registration Agency, Tax Administration of Kosovo, Public/Private Universities and others.

The cases carried over from 2023 to 2024 have been concluded by the full control and from the total number of declaring entities subjected to the full asset control, 1708 declaring entities were processed in accordance with the legal obligation that established the full control, in addition to the full asset control list.

Number of cases carried over	Closed cases	Cases referred as criminal reports to the Prosecution Office	Cases referred as information to the Prosecution	Cases referred as information to the Tax Administration of Kosovo	Cases referred as reprimands to the declaring entities
1708	1625	8	34	1	40

Table No. 10 reflects the data from the full control regarding the cases concluded and carried over from 2023-2024

During 2024, asset control commenced for the declaring entities in accordance with Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts. All declaring entities from Article 4, paragraph 1.1 to paragraph 1.18, as well as declaring entities from paragraph 1.19 to paragraph 1.38, one-third of the declaring entities were subjected to a control selection by lot. Declaring entities that declared their assets for the first time and are defined under Article 5: 70 declaring entities were subjected to a control selection by lot. The Agency initiated ex-officio processing of 15 cases for declaring entities, based on information reported by citizens through various forms.

According to the legal obligation	ex-officio (anonymous)	Total under control	Closed	Referred as criminal reports and information to the Prosecution Office	Carried over to 2025
1321	15	1336	12	3	1321

Table No. 11 reflects the data from the full control during 2024 as well as the results of the findings from the full control

Years	Full control	Closed cases	Cases referred for administrative procedure	Cases carried over to 2024	Cases handled (ex-officio) based on anonymous information or NGO
2022	973	916% (94.14%)	57 % (5.86%)	13 (1.34%)	41
2023	1735	19 (1.09%)	0	1716 (98.90%)	27
2024	1336	12	3	1321	12

Table No. 12 reflects data from the full asset control for 2022-2024

DECLARATION OF GIFTS RECEIVED BY INSTITUTIONS

According to Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts and Regulation No. 05/2024, institutions are obliged to appoint responsible officers for maintaining the gift register. This register must include all gifts received, their corresponding value and the names of the individuals who provided them.

The responsible officer for the gift registry must maintain the register for each officer who has received gifts, in accordance with his/her duties within the respective institutions. This process aims to ensure transparency and control over gifts that may influence the work and decision-making of officers.

Submission of Gift Form

The Agency for the Prevention of Corruption received by 1 March 2024 notifications from a total of 200 institutions. Of these, 24 institutions reported that they had received gifts, while 169 institutions reported that they had not received any gifts during the previous year. This reporting reflects a high level of transparency and compliance with legal obligations regarding the registration of gifts in the previous year.

However, some challenges persist: 2 local-level institutions have not yet appointed a responsible officer, raising concerns about the potential for incomplete and incorrect reporting of gifts at the local level. Furthermore, 1 institution has not submitted the relevant reports on received gifts, violating the requirements set by legislation for transparency and accountability.

In another case, in 2 institutions, the appointed responsible officers are currently involved in appeal processes, which has restricted their access to official emails, thus hindering the ability for regular and accurate reporting. Meanwhile, another institution stated that there are legal restrictions concerning reporting (KIA).

This information shows that while some institutions have demonstrated compliance with legal requirements, there are still challenges in the full implementation of proper reporting practices, particularly at the local level and within institutions facing internal administrative issues.

The institutions that have submitted copies of the gift registry with the specified data, during this year for the previous year, are listed in the table below:

No.	Institutions	Protocol gift	Occasional gift	Total number
1.	Office of the President	27	0	27
2.	Assembly of Kosovo	22	5	27
3.	Office of the Prime Minister	67	116	183
4.	Constitutional Court of Kosovo	10	0	10
5.	Supreme Court of the Republic of Kosovo	4	0	4
6.	National Audit Office	2	2	4
7.	Central Bank of Kosovo	103	53	156
8.	Agency for Prevention of Corruption	3	0	3
9.	Ministry of Justice	5	0	5
10.	Ministry of Internal Affairs	10	0	10
11.	Ministry of Foreign Affairs and Diaspora	41	33	74
12.	Ministry of Finance, Labour and Transfers	0	5	5
13.	Ministry of Economy	0	7	7
14.	Financial Intelligence Unit	29	0	29
15.	Kosovo Customs	0	9	9
16.	Ministry of Industry, Entrepreneurship and Trade	18	0	18
17.	Academy of Justice	2	0	2
18.	HUCSK-UCCK	3	0	3
19.	Kosovo Telecom	3	1	4
20.	Competition Authority of the Republic of Kosovo	0	8	8
21.	Deposit Insurance Fund of Kosovo	1	8	9
22.	Energy Regulatory Office	10	0	10
23.	Municipality of Ferizaj	12	0	12
24.	Municipality of Peja	2	0	2
	Total	374	247	621

Table No. 13. List of institutions that have submitted copies of the gift register

In 2024, officials from the Agency conducted several visits to institutions. From 17.10.2024 to 18.11.2024, 17 institutions were inspected and audited regarding the maintenance and registration of gifts declared by officials in these institutions for the previous year, January-December 2023.

Additionally, inspections were carried out to verify whether these institutions had displayed the gifts in a special and accessible section for parties and the public. As a result, of the 17 institutions, 13 have ensured designated gift display areas, while 4 of these institutions did not provide such a designated area, as required by law and were asked to fulfil this legal obligation.

The institutions that were inspected and which had ensured a designated gift display area are the Office of the President, Assembly of Kosovo, Office of the Prime Minister, National Audit Office, Academy of Justice,

Constitutional Court of Kosovo, Ministry of Economy, Ministry of Foreign Affairs and Diaspora, Agency for the Prevention of Corruption, Central Bank of Kosovo, Deposit Insurance Fund of Kosovo, Municipality of Prishtina, Ministry of Justice.

The institutions that have not ensured a designated gift display area are the Ministry of Education, Science and Technology, Ministry of Industry, Entrepreneurship and Trade, Ministry of Internal Affairs and Kosovo Energy Efficiency Fund.

The officials of the Agency responsible for the inspection and auditing of gifts, through contact officers within the institutions, have requested public sector institutions to inform the Agency of the establishment of internal rules, which through bylaws would define the rules and procedures related to gifts and favours.

Out of 201 institutions, 167 have declared that they do not have provisions regulating the receipt, registration and solicitation of gifts, while 30 declared that they have established rules related to gifts within bylaws.

Regarding the internal legal regulations concerning gifts and favours, of the 167 institutions for which the Agency received responses indicating no internal rules, out of 42 publicly-owned enterprises, 31 of which reported that they have no internal rules regulating the prohibition and receipt of gifts, while 11 reported that they have established provisions within internal acts.

Out of 86 central-level institutions, 7 reported that they have established provisions within internal acts related to gifts, while 79 reported that they have no internal rules regulating the prohibition and receipt of gifts.

Out of 34 independent institutions, 7 reported that they have established provisions within internal acts related to gifts, while 27 reported that they have no internal provisions regulating the prohibition and receipt of gifts.

Out of 38 municipal institutions/municipalities of the Republic of Kosovo, 4 reported that they have established provisions within internal acts, while 30 reported that they do not have internal provisions regulating the prohibition and receipt of gifts, and 4 municipalities have not responded so far.

Institutions	Total number	Have no internal rules	Have internal rules	No response
Publicly Owned Enterprise	42	31	11	
Central Level	86	79	7	
Independent Institutions	34	27	7	
Municipalities of the Republic of Kosovo	38	30	4	4
TOTAL	201	167	30	4

Table No. 14. Total number of institutions

RISK ASSESSMENT AND LEGAL ACTS AGAINST CORRUPTION

According to Law No. 08/L-017 of the Agency for Prevention of Corruption, Article 26, paragraph 1 of the Law, the Agency conducts corruption risk assessments in various fields or sectors.

In the implementation of this competency, the Agency, during the reporting year 2024, was supported by the Council of Europe's Project against Economic Crime (PECK III), in the process of identifying and selecting sectors with high and low corruption risks, for an in-depth risk assessment based on the Corruption Risk Mapping Guide developed by the Division for Economic Crime and Cooperation of the Council of Europe.

Initially, this Guide was adapted to the context of Kosovo, and during the implementation, it was further adjusted when collecting relevant information and documentation.

As part of this exercise, the Agency conducted a corruption risk mapping in 115 state institutions and 44 publicly-owned enterprises, with the aim of identifying and assessing sectors, activities and functions with high and low corruption risks at the national level.

To achieve this goal, the Agency undertook a series of important activities to collect, analyze and assess data on corruption risks for the state institutions and publicly-owned enterprises involved in this process.

The process began with the identification of 115 state institutions and 44 publicly-owned enterprises as entities that could undergo assessment according to the aforementioned Guide. Responsible persons and their contacts were identified.

This was followed by the organization of three meetings with representatives from state institutions and publicly-owned enterprises to explain the methodology and the importance of the corruption mapping process. These meetings served to inform the representatives of the state institutions and publicly-owned enterprises about their role in the process and their engagement in providing the necessary data.

The next step involved preparing and adapting the questionnaire, which was detailed to collect data on risk factor indicators, misuse indicators and corruption mitigating factors, and this was distributed to the assessment entities. Upon distributing the questionnaire, all responsible persons were contacted to confirm receipt of the questionnaire. The institutions were responsible for completing the questionnaires and providing supporting documents. The data collection deadline was flexible. During the data collection period, the responsible officers from the Agency regularly contacted the responsible officers of the evaluated entities to ensure the quality of the data.

The questionnaire consisted of two annexes. The assessed entities were required to provide a statement under oath confirming the authenticity and accuracy of the provided data, information and documentation.

In cases where the data was unclear or incomplete, the Agency made follow-up requests. Once the data reached the optimal level of completeness and quality, the assessment was carried out, with the Agency focusing on analyzing and verifying the data. This process also included comparing the information

obtained from the institutions with other sources, such as responsible institutions like the Information and Privacy Agency, the Ministry of Finance, Labour and Transfers and the Procurement Regulatory Commission, to avoid any discrepancies or eventual inaccuracies.

Furthermore, the Agency verified the collected data with its internal data on whistleblowing cases, asset declarations, gifts, conflict of interest prevention and integrity plans. These steps were taken to ensure an accurate and reliable assessment of corruption risks, establishing a structured and documented database.

An important part of the process involved providing unreserved assistance to the representatives of the institutions in completing the questionnaires and explaining the methodology of the risk mapping in detail.

At the end of all these activities, a final report was drafted, containing the analysis of the data and the results of the corruption risk assessment in the state institutions and public enterprises. The report has been published and for additional information, it can be found on the Agency's website, at the following link: https://apk-rks.net/wp-content/uploads/2024/12/2024-Gusht-Raporti-Hartezimi-i-Rrezikut-nga-Korrupsioni_ALB_compressed.pdf.

This process, through the corruption risk mapping in the assessed state institutions and publicly-owned enterprises, has helped and served as guidance for identifying the sectors most exposed to and those least exposed to corruption in Kosovo. It also contributes to providing valuable data for decision-makers who, through action, can strengthen and increase the level of transparency and accountability in the public sector.

Assessment of legal acts against corruption

The assessment of legal acts against corruption is also foreseen as a preventive measure according to Article 27, paragraph 1 of Law No. 08/L-017, which includes the assessment of risks and gaps in draft laws, draft bylaws, legal acts and bylaws that are still applicable and potentially could increase corruption.

In 2024, the Agency did not receive any requests from proposing bodies to assess the risks and gaps that could potentially increase corruption. However, on its own initiative, in accordance with the aforementioned provision of Law No. 08/L-017, and based on the Corruption Risk Assessment Methodology in Legislation, approved by the Agency in 2023, it carried out an assessment of several draft normative acts aimed at identifying and minimizing corruption risks within Kosovo's legal framework.

Initially, to implement this methodology, the Agency organized a 2-day workshop, the goal of which was to cover the theory and practice of corruption risk assessment in draft normative acts and legislative acts, as well as to provide the staff with the necessary skills to carry out such assessments effectively and efficiently.

In 2024, the Agency assessed the following draft legal acts:

- Draft Law on Foreign Service;
- Draft Regulation on the Engagement of Professional Associates at the National Theater of Kosovo;
- Draft Regulation on the Engagement of Professional Associates at the National Gallery of Kosovo;

- Draft Regulation on the Engagement of Professional Associates in the National Ballet of Kosovo;
- Draft Administrative Instruction on Amending and Supplementing AI No. 25/22012 on Licensing of Private Providers of Higher Education;
- Draft Administrative Instruction (MAFRD) – No. XX/2024 on Amending and Supplementing Administrative Instruction MA No. 22/2005 on Licensing of Ambulances, Stations and Veterinary Clinics.

In identifying and assessing them, the findings from the corruption risk mapping process served as guidance.

The findings from the evaluation of these draft acts are in the process of finalization to be submitted as recommendations to the Agency and the relevant sponsoring authorities.

In this context, the Agency has undertaken several steps to analyze and assess the risks and gaps that could potentially increase corruption and to determine whether these draft normative acts comply with international standards. Initially, meetings were held with the Legal Departments of the relevant Ministries sponsoring the assessed draft legal acts, followed by several internal meetings within the relevant unit of the Agency, with the aim of unifying the practice in implementing the Agency's Corruption Risk Assessment Methodology in Legislation.

Integrity Plans

The obligation for the approval of Integrity Plans by public institutions was strengthened through the adoption of Law No. 08/L-017. Article 25 of Law No. 08/L-017 obliges central government institutions, independent agencies and municipal authorities to draft and approve Integrity Plans no later than six months from the approval of the uniform methodology for drafting these plans.

The total number of institutions responsible for the approval of Integrity Plans identified by the Agency for the reporting year was 139.

The number of institutions that appointed responsible persons for managing the preparation and implementation of the Integrity Plan, following the Agency's request, was 133 responsible officers.

With the exception of 6 institutions, despite continuous information from the Agency on this matter, they have not appointed any responsible persons.

The public institutions that did not appoint responsible persons are:

1. Kosovo Investment and Enterprise Support Agency,
2. Municipality of Fushe Kosova,
3. Municipality of Gračanica,
4. Municipality of Leposavić,
5. Municipality of Shtërpçe,
6. Municipality of Zubin Potoku.

Public institutions that have not approved Integrity Plans

The deadline for approving Integrity Plans was 26.01.2024.

The Agency received 120 Integrity Plans approved by the heads of public institutions, while to date, 19 institutions responsible for their approval have not submitted any Integrity Plans.

No.	Institutions
1.	Kosovo Investment and Enterprise Support Agency
2.	Kosovo Accreditation Agency
3.	National Ensemble of Songs and Dances "Shota"
4.	Kosovo Philharmonic
5.	Health Inspectorate
6.	Kosovo Judicial Council
7.	Municipality of Shtime
8.	Municipality of Fushe Kosova
9.	Municipality of Gracanica
10.	Municipality of Leposavic
11.	Municipality of Shterpce
12.	Municipality of Zubin Potoku
13.	Ministry of Environment, Spatial Planning and Infrastructure
14.	Ministry of Defense
15.	Kosovo Cinematography Center
16.	University "Fehmi Agani" in Gjakova
17.	University "Hasan Prishtina" in Prishtina
18.	Universiteti "Isa Boletini" in Mitrovica
19.	University of Applied Sciences in Ferizaj

Table No. 15 List of institutions that have not submitted Integrity Plans

Out of the 120 public institutions that have developed Integrity Plans, 6 of these institutions have not developed their plans in accordance with the Integrity Plan Methodology approved by the Agency last year.

List of public institutions that have not developed Integrity Plans according to the Integrity Plan Methodology.

No.	Institutions
1.	Municipality of Prishtina
2.	Municipality of Deçan
3.	Municipality of Junik
4.	Municipality of Obiliq
5.	Municipality of Skenderaj
6.	Municipality of Ranillug

Table No. 16 List of institutions that have not drafted Integrity Plans

Reporting and Monitoring of Integrity Plans for the period January – June 2024

The Agency fulfilled its legal obligation by approving, on 16.05.2024, the Guide for monitoring and reporting on the Integrity Plan, as amended and supplemented on 19.08.2024, which can be found at the following link:

https://apk-rks.net/index.php/ova_doc/udhezuesi-per-monitorimin-dhe-raportimin-e-zbatimit-te-planit-te-integritetit/.

The Guide approved by the Agency has served as a reference to assist all public institutions in monitoring and reporting the implementation of the Integrity Plan.

In May and November 2024, the Agency organized 5 informational training sessions on how to monitor and report on the Integrity Plan and the obligations arising for the responsible officer from the Guide for monitoring and reporting Integrity Plans, as well as potential challenges.

The training sessions were held on 21, 28, 29 and 30 May 2024 and on 26 November 2024. These trainings were organized and conducted with the support of the OSCE Mission in Kosovo.

For the period January - June 2024, 91 public institutions reported on the progress of implementing their Integrity Plans, 1 public institution, the Kosovo Prosecutorial Council, reported not in accordance with the Guide for Monitoring and Reporting, and after a preliminary assessment, we did not accept it as a standard report. Meanwhile, 29 institutions did not report at all on the progress of implementing their Integrity Plans.

According to the data available to the Agency, 82 public institutions reported within the legal deadline, 1 outside the standard reporting method, and 8 institutions reported outside the legal deadline set by the Guide for Monitoring and Reporting Integrity Plans.

No.	Institutions
1.	Competition Authority
2.	Municipality of Gjilan
3.	Ministry of Justice
4.	Student Center
5.	University of Prizren
6.	Ministry of Finance, Labour and Transfers
7.	Municipality of North Mitrovica
8.	Municipality of Gjakova

Table No. 17 List of institutions that have reported outside the deadline

No.	Institutions
1.	Kosovo Metrology Agency
2.	Employment Agency of the Republic of Kosovo
3.	Air Navigation Services Agency
4.	Food and Veterinary Agency
5.	Agency for the Administration Sequestered and Confiscated Assets

6.	Kosovo Environmental Protection Agency
7.	Emergency Management Agency
8.	Kosovo Property Comparison and Verification Agency
9.	Health Insurance Fund
10.	National Library of Kosovo
11.	Central Labour Inspectorate
12.	Independent Commission for Mines and Minerals
13.	Central Election Commission
14.	Public Procurement Regulatory Commission
15.	Municipality of Deçan
16.	Municipality of Dragash
17.	Municipality of Hani i Elezit
18.	Municipality of Kamenica
19.	Municipality of Kaçanik
20.	Municipality of Malisheva
21.	Municipality of Partesh
22.	Municipality of Peja
23.	Municipality of Podujeva
24.	Municipality of Prishtina
25.	Municipality of Ranillug
26.	Ministry of Local Government Administration
27.	Ministry of Culture, Youth and Sports
28.	Ministry of Industry, Entrepreneurship and Trade
29.	University "Kadri Zeka" in Gjilan

Table No. 18. List of Institutions that have not submitted the six (6) month report to the Agency January - June 2024

Regarding the drafting, reporting on the implementation and monitoring of the Integrity Plans, separate reports have also been prepared.

COOPERATION WITH LOCAL INSTITUTIONS

During the reporting period, in fulfilment of legal obligations and in the course of cooperation with local institutions, the Agency established cooperation with all relevant institutions for the implementation of its scope. This has included holding various meetings, engaging in the preparation and completion of primary and secondary legislation, as well as carrying out other actions necessary to meet the Agency's requirements and needs. Activities and representations in cooperation initiatives and coordination of activities with high-level local institutions are led by the Director of the Agency, as follows:

- The Director of the Agency presented the Agency's mandate at the roundtable organized by NGO Aktiv, in Graçanica. /18 January 2024;
- Meeting with the Members of the Legislative Committee and representatives of the High Inspectorate for the Declaration and Control of Assets and the Conflict of Interest of the Republic of Albania./16 February 2024;

- Meeting with the High Inspectorate for the Declaration and Control of Assets and the Conflict of Interest of the Republic of Albania at APC for the signing of the “Memorandum of Cooperation on the Prevention of Corruption between Kosovo and Albania”. /21 February 2024;
- The Agency for Prevention of Corruption co-chaired the meeting of the Anti-Corruption Working Group, part of the National Council for Democracy and Human Rights /26 February 2024;
- The Agency for Prevention of Corruption participated in the roundtable discussion: Integrity in the private sector; Corruption from the supply side, organized by the Riinvest Institute. /29 February 2024;
- The Director of the Agency participated in the meeting held at the Embassy of the Kingdom of the Netherlands in Kosovo/1 March 2024;
- The Agency for Prevention of Corruption, led by Director Yll Buleshkaj, actively contributed to the High-Level International Conference in Tirana, titled “Strengthening Accountability: Empowering Efforts Against Corruption in the Western Balkans”/5 March 2024;
- At the Agency for Prevention of Corruption, Director Yll Buleshkaj met with the Chairman of the Independent Oversight Board of Kosovo Civil Service, Mr. Arben Mehmeti, and Board Member, Mr. Jeton Koca/13 March 2024;
- The Director of the Agency participated in the roundtable titled “Guidelines for Increasing Transparency in the Fight Against Corruption” in Shterpce, organized by NGO Aktiv. /22 April 2024;
- The Director of the Agency, Yll Buleshkaj, had a meeting with active citizens of the Municipality of Leposaviq. /22 May 2024;
- The Agency for the Prevention of Corruption (APC) of Kosovo organized a productive consultative meeting with Civil Society Organizations (CSOs) specialized in the prevention and fight against corruption/23 May 2024;
- The Director of the Agency participated in the roundtable titled “Presentation of Findings from the Corruption Risk Mapping Process”. /7 July 2024;
- The Director of the Agency participated in a meeting with citizens and activists for the prevention of corruption and transparency in Ranillug, where the Director of APC presented to the participants the mandate of the Agency, cooperation with civil society and the media, as well as the crucial importance of citizen participation in the prevention of corruption. /16 July 2024;
- The Director of the Agency participated in a meeting with citizens and activists for the prevention and fight against corruption, as well as the enhancement of transparency in North Mitrovica and Zveçan. /23 July 2024;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated in a meeting organized by the Information and Privacy Agency during the Public Access to Documents Week. /26 September 2024;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, participated as a panelist in the “PAR Kosova 2024” event in a panel on the topic: “Corruption, Ethics and Culture in Public Administration”/26 September 2024;
- The Agency for the Prevention of Corruption held a meeting with the youth of Zubin Potok, organized with the help of the NGO Aktiv and the support of INL Kosovo./27 September 2024;

- Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj held a productive meeting with the Governor of [Central Bank of the Republic of Kosovo](#), Mr. Ahmet Ismaili, at the CBK offices./23 October 2024;
- The Director of the Agency for the Prevention of Corruption, Yll Buleshkaj, participated in the strategic meeting organized by the OSCE Mission in Kosovo with beneficiaries and partners from the security sector to reflect on the productive cooperation during 2024 and plan for 2025./28 October 2024;
- The Director of the Agency for the Prevention of Corruption, Yll Buleshkaj, met with Mr. Artan Muratin, Senior Program Manager at the National Democratic Institute ([National Democratic Institute](#)) in Kosovo. /1 November 2024;
- The Director of the Agency for Prevention of Corruption (APC), Yll Buleshkaj, held a fruitful meeting with representatives of the International Monetary Fund ([International Monetary Fund](#)), including Mr. David Amaglobeli, Head of the IMF Mission to Kosovo; Mr. Javier Kapsoli, Senior Economist in the European Department; and Mr. Selim Thaçi, Senior Economist at the Office of the Permanent Representative in Kosovo./1 November 2024;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, received representatives of the AVONET Network of Non-Governmental Organizations in a fruitful meeting. /8 November 2024;
- The Director of the Agency for Prevention of Corruption, Yll Buleshkaj, welcomed Ambassador Aivo Orav, Head of the EU Office in Kosovo and EU Special Representative, in an introductory meeting./29 November 2024;
- The Agency for Prevention of Corruption actively participated in the Regional Conference on “Best Practices in Corruption Prevention”, held in Prishtina. Director of APC, Yll Buleshkaj, shared Kosovo's experiences in building sustainable institutions and promoting transparency./19 November 2024;
- Yll Buleshkaj, Director of the Agency for Prevention of Corruption, also participated in the meeting of the Committee on Legislation Mandates, Immunities, Rules of Procedure of the Assembly and Oversight of the Agency for Prevention of Corruption, where the Performance Plan for 2025 of the Agency for Prevention of Corruption was discussed and unanimously approved./5 December 2024;
- Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, participated in the conference “Whistleblowing: A Pillar for Transparency and Accountability”, organized by the initiative [CorrWatch](#), with the support of [British Embassy Pristina](#) in Kosovo./ 10 December 2024;
- Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj participated in the roundtable discussion organized by [Lëvizja FOL](#) on the topic “Whistleblowers from a Practical Perspective”, in the course of Anti-Corruption Week. / 10 December 2024;
- Director Buleshkaj participated in the meeting of the Council for Democracy and Human Rights for urgent action on mental health./11 December 2024;

COOPERATION COOPERATION WITH INTERNATIONAL ORGANIZATIONS AND FOREIGN INSTITUTIONS

International cooperation was achieved through the representation and participation of the Director and staff of the Agency in various activities, both domestically and internationally. These include international and regional visits, as well as participation in conferences and regional events. The main goal of these activities was the representation of the Agency and the exchange of best practices in preventing and combating corruption.

- Representatives of the Agency for Prevention of Corruption participated in the Regional Conference “Southeast Europe Together Against Corruption: Developing Regional Resilience”, organized in Sarajevo by the Regional Anti-Corruption Initiative (RAI)./21 February 2024;
- A delegation from the Agency for Prevention of Corruption in Kosovo, led by Director Yll Buleshkaj, conducted a study visit to Slovenia, specifically to the Commission for the Prevention of Corruption (CPC) in Ljubljana, with the aim of increasing cooperation and exchanging best practices in preventing and combating corruption./7 March 2024;
- The Agency for Prevention of Corruption of Kosovo held a successful visit to Transparency International in Slovenia. During the meeting, topics such as cooperation in the development of Slovenia’s anti-corruption strategy, monitoring of integrity plans and the civil society report with the Slovenian Commission for the Prevention of Corruption were discussed./8 March 2024;
- The representative of the Agency for Prevention of Corruption (APC), Mr. Bajram Lakna, participated in the roundtable “Integrity and Control Measures in Defense and Law Enforcement Institutions”, organized by [RACVIAC-Centre for Security Cooperation](#) and the [Regional Anti-Corruption Initiative - RAI](#) in Croatia./27 May 2024;
- The Agency for Prevention of Corruption in Kosovo, represented by Director Buleshkaj, was part of the high-level meeting among agencies from 30 countries across 5 continents, where the importance of preventing and combating corruption was discussed. The meeting took place as part of the International Anti-Corruption Conference held in Vilnius, Lithuania. /21 June 2024;
- From July 1-4, 2024, a delegation from the Agency for Prevention of Corruption (APC) of Kosovo, led by Director Yll Buleshkaj, conducted a study visit to the Republic of Korea. During this visit, the delegation held meetings at the UNDP Policy Center in Seoul and the Anti-Corruption and Civil Rights Commission (ACRC) of Korea. /1-4 July 2024;
- The Agency for Prevention of Corruption participated in the 23rd Plenary Monitoring Meeting of the Anti-Corruption Network for Eastern Europe and Central Asia (ACN), as well as the 29th Steering Group Meeting of ACN held in Paris, organized by the OECD./19 September 2024;

- The Agency for Prevention of Corruption (APC) participated in the 14th meeting of the Anti-Corruption Network of Law Enforcement Agencies organized by the OECD in Riga, Latvia./28 October 2024.
- Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, participated in the 4th Meeting of the OECD Business Integrity Group of the Anti-Corruption Network for Eastern Europe and Central Asia in Paris./26 November 2024.
- The Agency for Prevention of Corruption participated in the Annual Conference and General Assembly of [EPAC and EACN](#) held in Bucharest, Romania. At this significant event, our Agency became the 120th member of the largest network of Anti-Corruption Agencies and police oversight institutions in Europe./ 27 November 2024;

REGIONAL COOPERATION

- The Agency for Prevention of Corruption, led by Director Yll Buleshkaj, actively contributed to the High-Level International Conference in Tirana, titled “Strengthening Accountability: Empowering Efforts Against Corruption in the Western Balkans”./5 March 2024;
- The Agency for Prevention of Corruption participated in the regional conference in Tirana that discussed money laundering and corruption linked to environmental crime in the Western Balkans./7-8 March 2024;
- The Director of the Agency for Prevention of Corruption delivered a speech at the Regional Forum on “Against Corruption and State Capture – Progress Towards EU Membership for Western Balkan Countries”, organized by SELDI and the Albanian Center for Economic Research (ACER), held in Tirana./3 October 2024.
- The Director of the Agency for Prevention of Corruption (APC), Mr. Yll Buleshkaj, actively participated in the Anti-Corruption Conference for the Western Balkans held in Skopje. During the conference, he shared APC’s achievements in promoting transparency and fighting corruption./22 November 2024.
- The Director of the Department for Asset and Gift Control within the Agency for Prevention of Corruption, Mr. Afrim Atashi, participated in the conference “Regional Meeting on Asset Recovery Policies”, held in Budva, Montenegro./26 November 2024.

MEDIA ACTIVITIES

As a result of fulfilling its objective to carry out its mandate with transparency and accountability, the Agency maximized the number of concrete actions by cooperating with all relevant stakeholders in preventing corruption in Kosovo. During the reporting period, January-December 2024, it conducted a significant number of media and public awareness activities.

The Agency's media activities in 2024 focused on media communication, organizing press conferences and media interviews, and cooperating with the media in initiating the handling of cases related to conflict of interest prevention, administrative investigation procedures and suspicions of inaccurate asset declarations. Additionally, it proactively published information on the APC website. In 2024, the Agency organized:

- Media conference – such as the launch of the platform for reporting abuses in December 2024;
- Conference to present the results of the corruption mapping process supported by the Council of Europe;
- Information campaigns on the mandate of the APC that were broadcast on public television and social networks;
- As part of public information and accountability, and in response to journalists' requests during 2024, a total of 47 interviews or statements were conducted;
- From 54 responses provided to the media in 2021, and 165 responses in 2022, in the reporting period January-December 2023, the Agency provided responses to about 145 questions received from the media, while during 2024 about 140 responses;

PUBLIC AWARENESS ACTIVITIES

In order to inform public officials about the compliance with the established obligations for asset declaration, the Agency has prepared 3 television spots: 1) Call for asset declaration, 2) Call for corruption reporting and institutional cooperation; 3) Mandate of the APA. These were broadcast on the Public Radio Television of Kosovo (RTK).

As a result of cooperation with Non-Governmental Organizations, supported by the US Embassy in Pristina, the Director of the Agency, according to the Cooperation Agreement between the Agency and the Non-Governmental Organization AKTIV, has conducted seven awareness-raising activities with citizens of non-majority communities with the aim of raising public awareness about corruption reporting after the launch of the special mobile application for corruption reporting – ABER, in the municipalities of: Gracanica, Ranillug, Štrpce, North Mitrovica, Zvečan, Zubin Potok, and Leposavic.

REQUESTS FOR ACCESS TO PUBLIC INFORMATION

During the reporting period, the Agency received 21 requests for access to public documents, all of which were processed in accordance with Law No. 06/L-081 on Access to Public Documents.

Out of the total 21 requests, full access to information was granted for 16 requests, partial access was granted for 3 requests and access to public information was denied for 2 requests based on applicable legal provisions.

Processing of requests for access to public documents for the period January-December 2024:
21 requests received,
16 granted full access,
3 granted partial access,
2 denied

Profile of entities that requested access to public documents: 3 requests from the media, 13 requests from Non-Governmental Organizations, 4 requests from private individuals and 1 request from other entities. The nature of the access requests was as follows:

1. 10 for administrative documents
2. 1 for legal acts and bylaws
3. 8 for statistical data
4. 2 for other documents

INTEGRITY WEEK 2024

The Agency for Prevention of Corruption (APC) successfully organized the "Integrity Week 2024", an initiative dedicated to strengthening transparency, accountability and the integrity of institutions. This week-long series of events, held from 9 to 13 December 2024, brought together over 300 participants from public institutions, the private sector, civil society and the media, contributing to discussions on best practices in the fight against corruption.

Throughout the five days of activities, panel discussions covered topics such as institutional integrity, prevention of conflict of interest, the role of whistleblowing, public officials' transparency and public procurement challenges.

The event received widespread media coverage, reflecting the strong interest and significance of the issues addressed.

Day One: Institutional Integrity and Anti-Corruption Policies

The opening event of the “Integrity Week 2024” was held on December 9, marking the International Anti-Corruption Day. This roundtable discussion focused on the role of institutional integrity, the implementation of integrity plans, and anti-corruption policies.

Director of APC, Mr. Yll Buleshkaj emphasized that transparency and accountability are key elements for strengthening public trust in institutions. Additionally, APC

launched a new corruption reporting application, enabling a 24/7 reporting platform of violations.

Day Two: Transparency through Declaration of Assets and Gifts

On 10 December, discussions focused on the importance of public officials’ transparency through the declaration of assets and gifts, emphasizing that this mechanism is not just a legal obligation but an essential instrument for integrity building. At the end of the event, Ms. Arta Kotorri from the Office of the Prime Minister was awarded the Outstanding Contact Person Award.

Day Three: Preventing Conflict of Interest

On 11 December, APC hosted a panel titled “Preventing Conflict of Interest: A Prerequisite for Trust in Institutions”. Panelists shared best practices for avoiding conflicts of interest and discussed challenges in implementing regulations in public administration. The Outstanding Responsible Authority Award was presented to Ms. Albulena Stublla-Krasniqi from the Tax Administration of Kosovo.

Day Four: The Role of Whistleblowing in the Public and Private Sector

On 12 December, a roundtable discussion was organized on the role of whistleblowing in the public and private sectors. Participants discussed challenges and best practices for whistleblower protection. For her exceptional contribution, Ms. Fatmire Shala Kastrati from the Institute of Forensic Medicine was honoured with special recognition.

Day Five: Public Procurement – Integrity and Transparency

On 13 December, APC, in cooperation with the Public Procurement Regulatory Commission (PPRC), organized a roundtable on “Public Procurement – Opportunities and Risks”. The discussion focused on challenges in public procurement, mechanisms to enhance transparency and strategies to prevent violations. Director of APC, Mr. Yll Buleshkaj emphasized the need for inter-institutional cooperation to strengthen integrity.

Integrity Week 2024 proved to be a successful platform for debate and cooperation in enhancing transparency and integrity in institutions. The activities reflected the commitment of APC and its partners to preventing corruption and promoting good governance.

With wide participation and fruitful discussions, the event laid the foundations for advancing integrity policies in Kosovo.







HANDLING OF EXTERNAL WHISTLEBLOWING CASES

Under Article 18 of Law No. 06/L-085 on the Protection of Whistleblowers, whistleblowers have the right to report externally after first making an internal report, or they may directly report externally. For the public sector, the external whistleblowing procedure begins by reporting information to the Agency for Prevention of Corruption.

In 2024, APC received and processed a total of 48 reports. All cases were handled within the reporting period and no cases were carried over to the following year. The case outcomes are as follows:

23 cases were forwarded to competent authorities, including 5 cases referred to the Minor Offense Court, 3 cases referred to the State Prosecution Office, 6 cases referred to the Kosovo Police, 9 cases referred to other competent institutions

Cases referred to the Minor Offense Court - 2 cases where the whistleblower reports were not received and handled according to legal obligations, two because measures were taken against the whistleblowers, in violation of the Law on Protection of Whistleblowers and in one case where the respective institution failed to fulfil the legal obligation to appoint the Responsible Officer.

Cases referred to the State Prosecution Office - 3 cases have been referred as information, due to reasonable suspicion that there were elements of criminal offences and at the same time to assess

whether there is sufficient evidence or if additional evidence needs to be obtained, in order to continue with other further legal procedures.

Cases Referred to the Kosovo Police - Economic Crimes and Corruption Investigation Department : 6 cases were submitted to the Kosovo Police for preliminary assessment to determine whether criminal investigations should be initiated or if additional evidence was needed.

Cases Referred to Other Public Institutions - 9 cases were referred to institutions deemed competent by the Agency, including 2 cases to Kosovo Customs, 1 case to the Ministry of Justice, 3 cases to the Ministry of Internal Affairs, 1 case to the Ministry of Finance, Labour and Transfers, 1 case to the Municipality of Prishtina, 1 case to the Kosovo Insurance Bureau. These institutions were requested to assess the claims and take necessary actions.

Closed and rejected cases: 9 cases were closed in 2024 following an administrative procedure and investigation, as the allegations submitted by whistleblowers were not substantiated by evidence. These cases were mostly based on incomplete allegations, which lacked any compelling and reasonable evidence. Meanwhile, 16 cases were rejected on the grounds that they did not meet the requirements set by the Law on the Protection of Whistleblowers to be processed as External Whistleblowing by the Agency.

These cases, despite the Agency's attempts to have the potential whistleblowers substantiate their claims in line with the aforementioned Law (LPW), were rejected as they either failed to respond further or showed no interest in proceeding. Moreover, the element of public interest was lacking in most of these cases.

HANDLING OF INTERNAL WHISTLEBLOWING CASES

A public employer with more than fifteen (15) employees and a private employer with more than fifty (50) employees are required to appoint a responsible officer. In this regard, during 2024, out of **195** public institutions for which the Agency has data confirming the appointment of a Responsible Officer, **184** institutions submitted their reports to the Agency, while **11** institutions failed to do so.

Regarding private entities, a total of 11 entities reported whistleblowing cases for 2024.

During 2024, three institutions stood out with the highest number of whistleblowing reports: Hospital and University Clinical Service, Kosovo Energy Corporation and Kosovo Correctional Service.

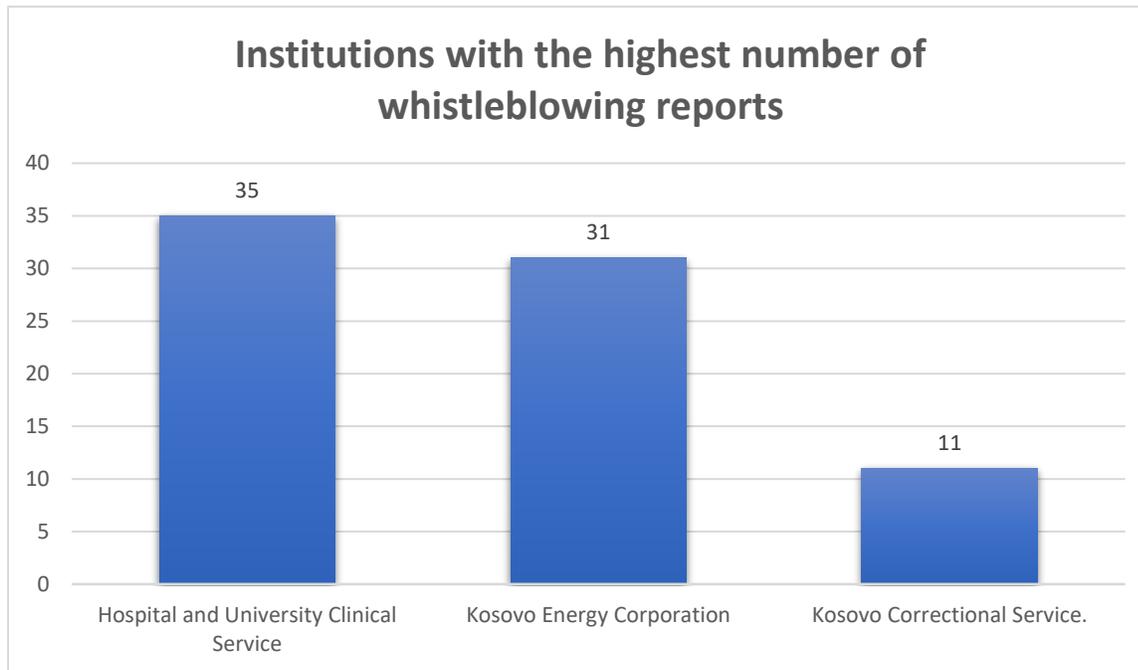


Figure 6. Graphical presentation of institutions with the highest number of whistleblowing reports in 2024.

ACTIVITIES/TRAININGS WITH RESPONSIBLE OFFICERS

The Agency for Prevention of Corruption (APC) is committed to conducting training sessions and educational activities for responsible officers in the area of whistleblowing, ensuring they are well-informed and capable of implementing whistleblower protection policies within their respective institutions.

These training sessions form a crucial part of APC's efforts to enhance the knowledge and skills of responsible officers in managing whistleblowing cases, enabling them to act in compliance with Law No. 06/L-085 on Protection of Whistleblowers and best international practices. The training sessions cover the following areas:

- **Understanding the Law and Whistleblowing Procedures:** Training responsible officers on the rules and procedures for handling whistleblowing cases and the proper approach to managing whistleblower reports.
- **Handling Whistleblowing Cases:** Developing skills for assessing and investigating whistleblowing cases to ensure a fair process for whistleblowers.
- **Importance of Transparency and Accountability:** Educating responsible officers on the role of transparency in public administration and how whistleblowing contributes to preventing corruption and improving public services.

- Training on Managing Confidential Information: Using technologies and methods to ensure that whistleblower reports remain secure and confidential, protecting the identity of whistleblowers.
- Ensuring Protection for Whistleblowers: Educating officers on how to protect whistleblowers from retaliation and possible repercussions that may follow a whistleblower report.

During 2024, the Agency for Prevention of Corruption (APC) conducted a total of ten (10) activities, all targeting responsible officers from public institutions. Several of these activities were supported by the OSCE Mission in Kosovo and were held throughout the year: two in May, two in June, two in October, three in November and one in December.

Through these training sessions, APC aims to foster a safer environment for whistleblowing, contributing to corruption prevention and promoting more accountable and transparent institutions.

Some photos from the activities





LESSONS LEARNED AND FUTURE PRIORITIES

The Agency's management has continued its focus on increasing transparency and institutional accountability throughout 2024, ensuring impartiality and equal treatment in the execution of its activities. This commitment has positively impacted public trust in the Agency, as evidenced by the numerous reports received by the Agency regarding inaccurate asset declaration, potential conflict of interest and other violations of public interest, submitted by citizens, various stakeholders, institutions and high-ranking state officials. This indicates an increase in citizens' awareness of reporting violations and their willingness to contribute to the fight against corruption.

Raising awareness among public officials on preventing conflict of interest was a key focus during 2024. The large number of requests to address conflict of interest situations demonstrates increased trust in the Agency's work. However, the reluctance of responsible authorities to address conflict of interest situations reflects a lack of commitment by institutions, particularly leadership, to implement and monitor internal procedures related to conflicts of interest. Despite ongoing awareness campaigns and continuous training, the Agency's goal remains to enhance the standard of responsibility and accountability among public officials, enabling them to handle conflict of interest during decision-making and official duties, and through their own initiatives avoid potential conflict of interest without the need for intervention by the Agency.

The internal systematization and reorganization of the Agency, in line with its mandate and legal competencies, has enabled the efficient distribution of human resources and significantly improved the management of the Agency's legal duties and responsibilities. An ongoing priority remains the enhancement of professional capacities; therefore, the approval of additional positions would greatly assist in improving the efficiency of the Agency's work, avoiding all the problems or challenges that the Agency faces due to the lack of sufficient staff in specific sectors of the Agency.

The implementation of the asset declaration and electronic submission system continues to enhance the transparency and accuracy of monitoring and verifying declared assets. The improvement and digital transformation of the Agency in 2024 was an important step that has impacted the efficiency and transparency of the Agency's work through various systems and platforms, which have facilitated the process of asset declaration and data management by officials, as well as providing easier access for citizens to use electronic services when reporting situations/cases to the Agency. An ongoing priority for the Agency in the area of digitalization is the integration of systems with other state institution systems/platforms, as a highly effective opportunity for collecting data from multiple sources and creating more detailed and data-driven analyses to identify potential violations in specific areas. This would also enable rapid and accurate information control.

Throughout this period, the Agency has consistently worked and acted towards increasing transparency and accountability, remaining open and responsible in informing the public and institutions about its work and activities. The Agency's cooperation with all relevant stakeholders, state institutions, non-governmental organizations and the media reflects the transparency and accountability of the Agency in relation to its work. The continuous publication of the Agency's activities, its participation in the media, conferences, various interviews and the ongoing publication of relevant information on the official website of the Agency have contributed to raising awareness and informing the public, demonstrating its commitment to being open and accountable to the public.

A continued priority for the Agency remains organizing activities focused on raising citizens' awareness about corruption and its impact on society, through various forms of information dissemination and communication with citizens, social media, educational campaigns, participation in TV programs, etc. Therefore, improving communication with the media and the public is a priority of great importance, as it helps increase transparency and the trust of citizens and public opinion in general regarding the work of the Agency and the results of its activities.

The continuous improvement and drafting of rules according to legal standards is a very important element that the Agency has implemented throughout, by adopting various bylaws to fully carry out its legal mandate. The bylaws adopted in 2024 have aided the Agency's work in creating and structuring a solid foundation for the implementation of legislation. A continued priority remains the updating of secondary legislation in line with primary legislation, adapting to the ongoing institutional needs and requirements, which is an essential need for the efficient running of work processes and the full fulfilment of the Agency's mission in the fight against corruption.

The increase in the number of whistleblowing reports during 2024 demonstrates growing trust in the whistleblowing mechanism. Trainings for responsible officers within institutions have also contributed to improving performance, as well as enhancing accountability and responsibility regarding whistleblowing and the protection of whistleblowers. An ongoing priority remains strengthening professional capacities for handling whistleblowing cases within institutions. Creating a safe and protective environment for whistleblowers is crucial to encourage reporting violations of public interest. It must be understood that their protection is a preventive mechanism against corruption, contributing to the overall strengthening of integrity in public and private sector institutions.

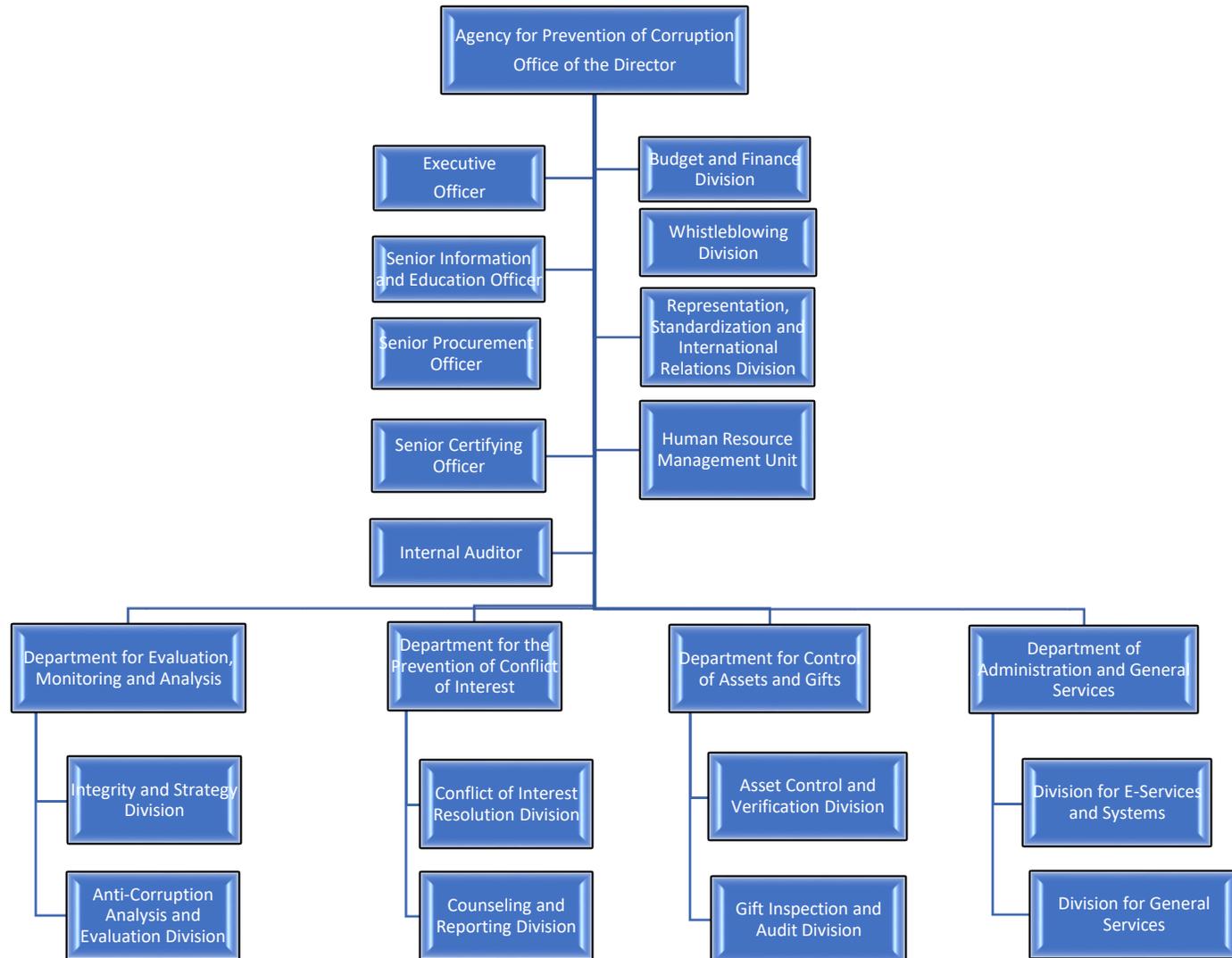
The Agency aims, through the strengthening of its professional expertise and expanding its capacities, to contribute significantly to the prevention of corruption in Kosovo by assessing corruption risks in sensitive sectors, addressing gaps in legislation that enable corruption, and monitoring integrity plans.

The requirements and needs identified by the Agency during the implementation of its annual performance plan for 2024 have been supported by various partners through projects. The strengthening of cooperation with those supporting the Agency's work is aimed to continue further.

In 2024, there has been successful cooperation and coordination of its activities with various international partners. It has contributed to various activities both domestically and internationally, which have also emphasized the importance of establishing and strengthening ties and cooperation with international anti-corruption networks. This has helped the Agency adopt best practices for preventing and combating corruption, implementing some of them in its own work. Therefore, recognizing the importance of cooperation and support from international partners, which the Agency has leveraged in achieving its objectives, a continued priority for the Agency will be its representation in international activities, as well as strengthening regional and global cooperation with counterpart agencies and various international organizations.

A priority of particular importance remains the engagement of all responsible institutions to act towards strengthening the authorities responsible for preventing conflicts of interest, contact officials for asset and gift declarations, as well as officials responsible within institutions for whistleblower protection, and creating adequate working conditions for them, such as contact and coordination points with the Agency, in relation to their specific legal responsibilities regarding the prevention of conflicts of interest, declaration of assets and gifts and whistleblowing.

ANNEX NO. 1. ORGANIZATIONAL CHART OF THE AGENCY FOR PREVENTION OF CORRUPTION (APC)



ANNEX NO. 2. LIST OF PARTICIPATION IN TRAININGS, FORUMS, SEMINARS DURING 2024

No.	Type of training	Organized by	Place	Date	No. of participants
1.	Evaluation methodology related the restructuring process with the aim of transferring/systematizing jobs in APC	KFA	Tirana	07-10.02.2024	4
2.	Conference "Southeastern Europe - Together against Corruption"	RAI	Sarajevo	19-21.02.2024	2
3.	Advanced training to strengthen institutional integrity	OSCE	Prishtina	26-27.02.2024	6
4.	Electronic Document Management and Archiving System (EDMAS)	MIA	Prishtina	28.02.2024	1
5.		OSCE	Ljubljana	06-09.03.2024	5
6.	Corruption and money laundering associated with environmental crime	Council of Europe	Tirana	07-08.03.2024	1
7.	The Police Intelligence-Led Investigation (PLI) analytical process for integrated financial investigations in combating organized crime	OSCE	Prishtina	18-19.03.2024	5
8.	Workshop on drafting and finalizing legislation deriving from the Joint Declaration of Commitment	MoJ	Peja	19-22.03.2024	1
9.		OSCE	Prizren	24-26.04.2024	12
10.	Investigating virtual assets, including the practice of tracking and analyzing crimes related to cryptocurrency transactions	OSCE	Prishtina	07-08.05.2024	3
11.	Expert support in the sequestration, freezing and confiscation of crimes related to virtual assets	OSCE	Prishtina	10.05.2024	5
12.	Whistleblowing	GIZ	Prishtina	13-14.05.2024	10
13.	Drafting of the Integrity Plans	GIZ	Prishtina	15-16.05.2024	10
14.	Integrity and Control Measures in Law Enforcement and Protection Institutions	RACVIAC/RAI	Zagreb	19-22.05.2024	1
15.	Training for undercover investigations related to abuse of official position	OSCE	Prishtina	20-21.05.2024	5
16.	Training of trainers on financial investigations	OSCE	Prishtina	22-23.05.2024	6
17.	Drafting of the Rules of Procedure of APC and the Code of Conduct for APC Officials	APC	Tirana	11-13.06.2024	8
18.	International Anti-Corruption Conference	US Embassy	Vilnius	17-22.06.2024	1

19.	International Anti-Corruption Conference	UNDP	Vilnius	17-22.06.2024	1
20.	Rapid implementation of the United Nations Convention against Corruption: Regional Platform for the Western Balkans	UNODC	Tirana	25-27.06.2024	2
21.	Study visit	UNDP	Seul	30.06-04.07.2024	4
22.	TpT for the Legislation Drafting System LDS	Prishtina	KIPA	10-17.07.2024	1
23.	Assessment of Corruption in Legislation	Istog	SAEK III UNDP	29-31.07.2024	12
24.	23 rd Monitoring Meeting and 29th Steering Group Meeting	Paris	OECD	16-19.09.2024	2
25.	Workshop on planning the Reform Agenda under the EU Reform and Growth Facility for the Western Balkans	Brezovica	Office of the Prime Minister	26-27.09.2024	1
26.	Anti-Corruption and State Capture - Progress towards European Union membership of the Western Balkan countries	Tirana	South-East Europe Leader for Development and Integrity (SELDI)	03.10.2024	1
27.	Commercial Law Development Program	Paris	USA	14-15.10.2024	1
28.	Part of the Working Group on Public Integrity and Anti-Corruption	Paris	OECD	15-16.10.2024	1
29.	Update of the Integrity Plan	Prizren	APC	16-18.10.2024	13
30.	Anti-Corruption Law Enforcement Enhancement for Eastern Europe and Central Asia (ACN LEN)	Riga	OECD	23-25.10.2024	2
31.	APC Annual Performance Plan for 2025	Tirana	APC		12
32.	Report Corruption	Istog	SAEK III UNDP	11-13.11.2024	10
33.	Annual Professional Conference and General Assembly	Bucharest	EACN	26-27.11.2024	2
34.	Anti-Corruption Law Enforcement Enhancement for Eastern Europe and Central Asia (ACN LEN)	Paris	OECD	25-26.11.2024	1
35.	Drafting of the Regulation on the Procedure for Verification and Control of Asset Declaration	Tirana	APC	13-16.12.2024	10
36.	Visit to the High Inspectorate of Declaration and Audit of Assets and Conflict of Interest in Albania	Tirana	APC	17-19.12.2024	4

List of declaring entities that have not respected the deadline for the regular annual declaration of assets RAD

No.	Name	Surname	Institution	Position
1	Besa	Morina Gega	National Audit Office	Senior Auditor
2	Ramiz	Krasniqi	Regulatory Authority for Water Services	Director of the Department for Finance and General Services
3	Jasmina	Stanojević	Tax Administration of Kosovo	Mid-level Officer for Mandatory Collection
4	Miradije	Gashi	Kosovo Customs	Senior Customs Officer
5	Meleqe	Toçani	Kosovo Police	Officer for Analysis of Economic and Financial Crimes
6	Shaqir	Brahimi	National Institute of Public Health	Specialist Epidemiologist
7	Fikret	Lutfiu	Food and Veterinary Agency	Veterinary Inspector
8	Selviqe	Blakaj-Gashi	Ministry of Agriculture, Forestry, and Rural Development	Deputy, Head of Division
9	Habib	Shehu	Municipality of Rahovec	Member of the Board of Bus Station
10	Lule	Ballata	Ministry of Culture, Youth, and Sport	Chairperson of the Board
11	Dukagjin	Krasniqi	Kosovo Police	Investigator
12	Reshadije	Nuredini	Ministry of Education, Science and Technology	Deputy Certifying Official
13	Melihate	Godanci- Haxhiu	Tax Administration of Kosovo	Internal Auditor
14	Perparim	Tabaku	Kosovo Customs	Head of the Shift
15	Velvetie	Zogaj	Kosovo Police	Investigator
16	Elmaze	Muharremi	Universiteti "Isa Boletini" Mitrovicë	Head of Procurement
17	Ardiana	Krrabaj	Ministria e Industrisë, Ndërmarrësisë dhe Tregtisë	Director of Directorate
18	Sahit	Hoti	Kosovo Police	Police Station Commander
19	Adlije	Seta	Kosovo Police	Investigator
20	Teuta	Fejza	National Institute of Public Health	Director of RCPH
21	Kumrije	Krasniqi	Kosovo Police	Investigator
22	Arsim	Maxhuni	Tax Administration of Kosovo	Mid-level Tax Inspector
23	Afërdita	Ahmeti	Tax Administration of Kosovo	Tax Inspector
24	Mevlide	Kosumi Qarri	Kosovo Judicial Council	Judge
25	Florim	Shkreta	Municipality of Hani i Elezit	Chairperson of the Municipal Assembly
26	Mevlyde	Kelmendi Begolli	Regional Water Company - Hidrodrini	Member of the Board of Public Enterprise
27	Bastri	Zejnullahu	Kosovo Police	Police Station Commander
28	Bergita	Curri	Institute of Forensic Medicine	Forensic Medicine Expert
29	Hysri	Ibishi	Kosovo Customs	Senior Customs Officer
30	Labinot	Ibrahimi	Kosovo Police	Supervisor
31	Ferat	Rukolli	Kosovo Police	Investigator
32	Enver	Gashi	University Hospital and Clinical Service	Member
33	Anton	Zhushi	Tax Administration of Kosovo	Medium-level Tax Inspector

34	Miroslav	Minic	Municipality of Leposaviq	Director for Agriculture and Rural development
35	Osman	Halitaj	Tax Administration of Kosovo	Tax Inspector
36	Shenaj	Bashota	Education Inspectorate	Education Inspector
37	RAMADAN	DACAJ	Ministry of Education, Science and Technology	Chairman of the Sub-Council
38	Valbona	Leka	Kosovo Police	Investigator
39	Sylë	Kolica	Tax Administration of Kosovo	Tax Inspector
40	Esfere	Sherifi	Education Inspectorate	Education Inspector
41	Ivana	Zivic	Ministry of Health	Sanitary Inspector
42	Mirjana	Velić	Municipality of Graçanica	Internal Auditor
43	Marko	Bogosavljevic	Tax Administration of Kosovo	Administrative Officer for Debt Collection
44	Violeta	Sakic	Municipality of Leposaviq	Director for Social Welfare
45	Milenko	Milintijevic	Kosovo Customs	Senior Customs Officer
46	Radiša	Mihajlovic	Kosovo Police	Investigator
47	Xhemajl	Dervishi	Food and Veterinary Agency	Coordinator of the Regional Office in Mitrovica
48	Bekim	Krasniqi	Kosovo Agency for Property Comparison and Verification	Deputy Head of the Implementation Unit
49	Nazmi	Hoxha	Ministry of Agriculture, Forestry, and Rural Development	External Political Advisor to the Minister
50	Marko	Arsic	Tax Administration of Kosovo	Administrative Officer for Debt Collection
51	Aleksandar	Milojević	Tax Administration of Kosovo	Administrative Officer for Debt Collection
52	Nemanja	Sekulić	Tax Administration of Kosovo	Mid-level Tax Inspector
53	Arlinda	Zahiti	Municipality of Leposaviq	Director for Communities
54	Marigona	Preteni-Peci	Municipality of Leposaviq	Director for Economic Development
55	Elianë	Blakaj	Municipality of Istog	Director of the Directorate
56	Arrita	Gola	Ministry of Education, Science and Technology	Political Advisor
57	Edojeta	Hasanaj	Municipality of Istog	Officer for Budget and Finance
58	Abdurrahman	Junuzi	Kosovo Police	Investigator
59	Agron	Dina	Regional Waste Management Company EKOREGJIONI	Member of the Public Enterprise Board
60	Kaltrinë	Zenuni	Procurement Review Body	External Technical Expert in Procurement
61	Aurorë	Osmani-Buca	Municipality of Gjilan	Board Member
62	Halim	Behramaj	Kosovo Police	Investigator
63	Valon	Shala	Ministry of Health	Sanitary Inspector
64	Gentiana	Ahmeti	Tax Administration of Kosovo	Tax Inspector
65	Dalibor	Dobrosavljevic	Tax Administration of Kosovo	Administrative Officer for Debt Collection
66	Nazmije	Paqarizi	General Hospital in Prizren	Senior Procurement Officer
67	Nazmi	Suma	Municipality of Hani i Elezit	Member of the Public Enterprise Board
68	Aleksandra	Andjelković	Kosovo Customs	Senior Customs Officer
69	Besnik	Hyseni	Kosovo Police	Senior Investigative Officer
70	Rrahman	Selmani	Municipality of Shtime	Traffic Inspector

71	Naim	Nuhiu	Kosovo Police	Investigator
72	Ahmet	Delolli	Labor Inspectorate	Head of Division for Regional Coordination Prishtina
73	Ymer	Sylejmani	Kosovo Police	Investigator
74	Mehmet	Zeqiri	Kosovo Police	Investigator
75	Nuhi	Maliqi	Tax Administration of Kosovo	Tax Debt Collection Officer
76	Rrushe	Gashi	Municipality of Prishtina	Procurement Officer
77	Feti	Breznica	Municipality of Fushë Kosovë	Construction Inspector
78	Elizabeta	Kabashi	Tax Administration of Kosovo	Mid-Level Officer for Mandatory Collection
79	Erim	Berisha	Ministry of Regional Development	External Political Advisor
80	Zenun	Kqiku	Ministry of Infrastructure and Transport	Driving School Inspector
81	Bislim	Sadriu	Kosovo Police	Investigator
82	Jakup	Berisha	Kosovo Police	Investigator
83	Erden	Atiq	Municipality of North Mitrovica	Mayor of the Municipality
84	Fehmi	Krasniqi	Ministry of Education, Science and Technology	Member
85	Agron	Maloku	Ministry of Foreign Affairs and Diaspora	Director of the Department for Finance and General Services
86	Gani	Halilaj	Kosovo University Clinical Center	Forensic Medical Expert
87	Beqir	Berisha	Municipality of Suhareka	Environmental Inspector
88	Orhan	Hyseni	Kosovo Customs	Senior Customs Officer
89	Nazife	Rrecaj	Tax Administration of Kosovo	Mid-level Officer for Mandatory Collection
90	Esat	Maxhuni	State Agency for Archives	Archive Inspector

List of declaring entities that have not respected the deadline for declaring assets upon assuming office DAD

No.	Name	Surname	Position	Institution
1.	Kujtim	Zajmi	Specialist Doctor of Occupational Medicine	National Center for Occupational Medicine in Gjakova
2.	Rrahman	Shala	Orthopedic Specialist Doctor	General Hospital in Prizren
3.	Lulzim	Ibri	Associate Professor	University "Ukshin Hoti" Prizren
4.	Albert	Shkoza	Neonatologist Specialist	General Hospital in Gjilan
5.	Nakije	Baliu	Specialist Doctor	Spitali i Përgjithshëm në Gjilan
6.	Gazmend	Musliu	Specialist Doctor of Emergency Medicine	General Hospital in Mitrovica
7.	Luan	Kryeziu	Assistant Professor	University "Hasan Prishtina" Pristina
8.	Orhan	Qerimi	Specialist Doctor	Mental Health in Kosovo