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AGENCY FOR PREVENTION OF CORRUPTION



ANNUAL REPORT

JANUARY - DECEMBER 2025

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AGENCY FOR PREVENTION OF CORRUPTION (APC)**ANNUAL REPORT****JANUARY - DECEMBER 2025**

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 2025 to the Assembly of the Republic of Kosovo, specifically to the Parliamentary Committee on Legislation, Mandates, and Oversight of the Anti-Corruption Agency

The Annual Report of the Agency for 2025 reflects the work of the Agency over the year, and provides an analysis of the Agency's activities related to the implementation of activities based on the 2025 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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Honourable Members of the Assembly of the Republic of Kosovo,

It is my pleasure to present to you the Annual Report of the Anti-Corruption Agency for 2025. This report is not merely a statistical summary – it is a clear reflection of our daily efforts, grounded in our legal mandate, to strengthen institutional integrity, transparency, and citizens' trust in the rule of law, in full compliance with European and international standards.

During 2025, the Agency achieved concrete and measurable results. The budget execution reached 99.35%, demonstrating rigorous and efficient management of public funds. The asset declaration process was completed by 98.47% of the 12,682 declaring subjects – a very high rate indicating increased accountability of public officials. A total of 174 conflict of interest cases were handled, 92 external whistleblowing reports were received and administratively investigated (an increase of 91.7% compared to 2024), while Integrity Plans were monitored and updated in over 100 institutions.

Digital transformation remained a strategic priority. The new DMSA system was launched, along with the "Report Corruption" platform – all meeting high standards of security and interoperability with state systems. These modern solutions have reduced bureaucracy, increased transparency, and shortened case processing time.

International cooperation reached its peak: membership in the European NEIWA network, study visits to France, Portugal, and Italy, and close cooperation with the OECD, the Council of Europe, the OSCE, and UNDP. Kosovo has been recognized as a regional example in corruption risk mapping and whistleblower protection.

However, the report also identifies real challenges. A Supreme Court judgment has created legal uncertainty in the criminal treatment of non-declaration of assets, weakening the preventive effect. Some institutions still hesitate to address conflicts of interest at their source, referring all cases to the Agency. These shortcomings require immediate legal intervention.

Honourable Members,

The Agency stands ready to continue its work with full professionalism. However, our success also depends on your support: adopting the necessary legal amendments, strengthening institutional independence, and a joint commitment to a corruption-free Kosovo. We have demonstrated that we are a modern, digital, and results-oriented institution. Now is the time for the Assembly to support us on this European path.

Thank you for your attention!

Respectfully,

Yli Buleshkaj,

Director of the Anti-Corruption Agency

EXECUTIVE SUMMARY

The Annual Report of the Agency for Prevention of Corruption for 2025 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 Prevention of Corruption

Through its mechanisms for the prevention of corruption, conflict of interest, declaration of assets and gifts, as well as whistleblowing, the Agency has focused its work mainly on their oversight, through advising institutions, senior public officials, as well as on the importance of timely prevention of conflict of interest situations. This also includes organizing the process of declaration and control of assets, as well as the receipt of gifts during the discharge of official duties, and the whistleblowing process. In all these areas, the Agency continuously provides information and training.

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 has provided support and professional expertise according to the requests and needs of public institutions in drafting internal rules related to issues of ethics and integrity, namely in drafting integrity plans, their monitoring and updating, as well as reporting on their implementation.

Overview of the Agency's Work

The Report provides an overall summary of the work carried out during 2025, including activities and training programs to raise awareness regarding prevention of corruption, including the creation of visual products and the receipt and handling of over 10,000 asset declaration records.

Implementation of Legislation and its Supplementation

The Report describes the actions of the Agency and the implementation of the applicable legislation, which have continued to increase the efficiency and effectiveness of internal operation and control procedures for the prevention of corruption, including the drafting and adopting of bylaws.

International Cooperation

Addressing international and regional cooperation through intensifying bilateral and multilateral meetings, conducting study visits, memberships in international networks and mechanisms, as well as

organizing and participating in professional trainings and forums. This cooperation has included the exchange of information, experiences and best practices with counterpart institutions, international organizations and regional partners, with the aim of strengthening institutional capacities, increasing transparency and advancing standards for preventing and combating corruption in accordance with European and international practices.

Challenges and Priorities for the Future

The Report identifies the challenges faced by the Agency during 2025 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 Prevention of Corruption in 2025 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
ASHI	Agency for Information Society
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
CPCK	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 Program
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; and 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 of initiatives, which are to be undertaken by the institutions for the prevention of corruption;
- Providing recommendations to the Assembly of the Republic of Kosovo and the Government of the Republic of Kosovo for the assessment of draft laws related to the prevention of corruption when that is requested by these institutions or by the decision of the Director of the Agency;
- Monitoring the implementation of the National Strategy against Corruption along with the 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 offense 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 Agency for Prevention of Corruption, during 2025, operated based on Regulation No. 07/2024 on the Organization and Systematization of Workplaces in APC, which was later replaced by Regulation No. 02/2025 on the Organization and Systematization of Workplaces in APC, approved in accordance with Regulation (GRK) No. 06/2024 on the Classification of Jobs in Civil Service, according to the new internal organizational structure([Organizational Chart of the Agency](#)).

The Agency for Prevention of Corruption in 2025 operated with 58 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. Control and Verification of Assets Division, 2. Gift Inspection and Audit Division, as well as 3. Asset Declaration and Imposition of Fines Division.
- The Department for the Prevention of Conflict of Interest is responsible for overseeing the mechanisms and regulatory framework for the prevention of conflict of interest across the public institutions of the country, as well as advising senior public officials, thereby contributing to 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 two divisions: 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 and effective services and administrative support, e-services and information technology. This Department consists of: 1. General Services Division, and 2. E-Services and Systems Division.
- 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 efficient functioning of mechanisms for whistleblowing violations in the public sector, administrative investigation, and the protection of whistleblowers.

- The Representation, Standardization and International Relations Division 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 an effective management of human resources, through the development of procedures and services that contribute to achieving the goals of the institution and employees.
- 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.

Pursuant to the Law on Budget Appropriations, the Agency's budget for 2025 was €1,099,235.00, whereas the final budget at the end of 2025 stood at €1,089,943.85. From the final budget, a total of €1,082,919.90 was spent, representing 99.35%.

The allocated funds were planned and managed in accordance with the legal obligations set out in the Law on Public Financial Management, which met the institution's actual needs.

During 2025, the Agency for Prevention of Corruption, within the reporting period for declaring entities, imposed administrative fines on entities that were late in declaring assets, in accordance with the provisions of the Law on Declaration of Assets and Gifts.

As a result of these actions, the non-tax revenues generated from the fines imposed and recorded during the reporting year reached a total value of €18,810.45.

	Economic categories	Approved Budget (initial)	Changes in the Budget	Final Budget	Total Expenditures	% of realization based on the final budget
N o .		a	b	c	d	e=(c÷b)
1	Wages and Salaries	776,679.00	-9,291.15	767,387.85	767,387.85	100%
2	Goods and Services	136,556.00	-4,180.00	132,376.00	128,060.20	96.73%
3	Municipal expenditures	6,000.00	-900.00	132,376.00	2,391.89	46.89%
4	Non-financial assets	180,000.00	+5,080.00	185,080.00	185,079.97	100%
5	Total	1,099,235.00	-9,291.15	1,089,943.85	1,082,919.90	99.35%
	Revenues	18,810.45				

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

Based on budget appropriations, following the allocation of funds in line with planning and contractual obligations, the procurement plan, as well as the internal activities institution, the cash flow plan was prepared.

Wages and Salaries - The initial allocations in the Wages and Salaries category amounted to €776,679.00; following budget changes pursuant to decisions of the MFLT, the final budget amounted to €767,387.00. The funds spent likewise reached €767,387.00, reflecting full realization at the level of 100%.

The difference between the initial and the final budget resulted from two Government decisions during the year:

- Decision No. 03/261, dated 05.06.2025, due to the increase of the coefficient, added €17,879.40 to the initial budget.
- Decision No. 01/281, at the end of the year, provided for the withdrawal of unspent funds in the amount of €27,170.55, because several positions remained vacant during the first part of the year, while they were filled in the second part of the year.

As a result of these changes, the final budget was harmonized at €767,387.00 and was fully realized.

Goods and Services - The budget initially allocated under the Goods and Services category was €136,556.00. For the purpose of meeting institutional needs, and at the Agency's request, in accordance with Decision No. 3042-3/2025 of the Ministry of Finance, Labour and Transfers, the amount of €4,180.00 was transferred from this category to the Capital Investments category for the implementation of the capital project "Supply with official vehicles".

Following this transfer, the final budget of the Goods and Services category stood at €132,376.00. From this budget, a total of €128,060.20 was spent, corresponding to a realization rate of 96.73%.

Utilities - The budget initially allocated under the Utilities category was €6,000.00. For the purpose of meeting institutional needs, and at the Agency's request, in accordance with Decision No. 3042-3/2025 of the Ministry of Finance, Labour and Transfers, the amount of €900.00 was transferred to the Capital Investments category for the implementation of the capital project "*Supply with official vehicles*".

Following this transfer, the final budget of the Utilities category stood at €5,100.00, of which €2,391.89 was spent, corresponding to a realization rate of 46.89%.

Under this category, the Agency made payments for fixed telephony services, while the other obligations arising from this category were covered by the Ministry of Internal Affairs (MIA).

Capital Investments – Pursuant to Law No. 08/L-332 on Budget Appropriations for the Budget of the Republic of Kosovo for 2025, the initial budget approved for the Capital Investments category for 2025 was €180,000.00. During the year, budget changes occurred within this category as a result of the approval of requests for the transfer of funds from the Goods and Services and Utilities categories, in the total amount of €5,080.00, for the implementation of the activity "*Supply with official vehicles*", in accordance with the Agency's request and Decision No. 3042-3/2025 of the MFLT.

The projects implemented within this category are as follows:

- Supply with official vehicles for the needs of the Agency for Prevention of Corruption;
- Development and implementation of the advanced electronic system for asset declaration and case management; and
- Development of digital infrastructure for the management and storage of APC documents and protocol.

As a result of these changes, the final budget in the Capital Investments category for 2025 stood at €185,080.00, whereas actual expenditures reached €185,079.97, reflecting full realization at the level of 100.00%.

Revenues - The Agency for Prevention of Corruption, through the process of imposing fines, generated revenues in the amount of €18,810.45 during 2025.

No.	Economic categories	Final budget for 2025	Expenditures 2025	Final budget for 2024	Expenditures 2024	Final budget for 2023	Expenditures 2023
		a	b	c	d	e	f
1	Wages and Salaries	767,387.85	767,387.85	556,507.18	556,507.18	513,851.18	513,851.18
2	Goods and Services	132,376.00	128,060.20	123,466.00	112,697.66	114,056.00	101,110.04
3	Utilities	5,100.00	2,391.89	8,500.00	3,120.09	8,500.00	2,703.01
4	Non-financial assets	185,080.00	185,079.97	94,000.00	88,517.5	20,000.00	6,677.00
	Total	1,089,943.85	1,082,919.90	782,473.18	760,842.43	656,407.18	624,341.23

Table No. 2 reflects the budget appropriations by economic categories and expenditures for the period 2023-2025.

PERSONNEL

During 2025, the Human Resources Management Unit continued its activities based on Law No. 06/L-197 on Public Officials. The Human Resources Management Unit managed and assisted in the performance evaluation process of the Agency's officials for the previous year. The staffing plan and training plan were developed, and all systems directly related to the responsibilities of the Human Resources Unit were administered, such as the Human Resources Management System <https://hrmis.rks-gov.net>, the Access Control system <http://svp.rks-gov.net/>, the Archives system <https://smaed-online.rks-gov.net> /, and the Payroll Management system <https://smp.rks-gov.net>.

The necessary data in all of these systems were updated, including the updating of data in officials' files, leave management, monthly reports on attendance at work for all staff, as well as all changes related to the salaries of APC officials.

All Appointment Acts, as well as the relevant decisions, were amended pursuant to Regulation No. 02/2025 on Internal Organization and Systematization of Jobs in APC.

Position:	Category	No. of applicants	No. of appointees
Senior IT Systems Officer	Professional 1	65	1
Head of the General Services Division	Low level management	15	1
Archive Officer	Professional 2	54	1

Senior Human Resources Officer	Professional 1	57	1
Head of the Budget and Finance Division	Low level management	18	1

Table No. 3. Recruitment procedures during 2025

As regards the participation of the officials of the Agency in various trainings, forums and seminars during 2025, see the data listed in: **Annex No. 2. List of participation in trainings, forums and seminars during 2025.**

PROCUREMENT

During 2025, the Agency exceeded the threshold of 50 employees, thereby acquiring the right to process procurement activities as an independent institution. The procurement activities planned for 2025 were implemented in accordance with the Procurement Plan, and out of 22 planned procurement activities, 15 were carried out through open procedures and 4 through the mini-tender procedure, namely a total of 19 procurement activities. Within these, 5 activities were cancelled and re-tendered. Contracts concluded with the CPA and that were valid continue to be in force, whereas contracts implemented by the CPA for all institutions pursuant to Government Decision function in the same manner for the APC as for other authorities.

Within the framework of procurement activities, purchase orders were also issued through the KFMIS, contract management plans were processed, and contract management was carried out through the e-Procurement system.

ELECTRONIC SYSTEMS AND DIGITALIZATION

During the reporting period, from 1 January 2025 to 31 December 2025, the Agency implemented important projects as part of the digital transformation of its work processes and in the advancement of existing electronic systems. All developed projects and the main activities related to electronic systems were based on the Agency's performance plan for 2025, with the E-Services and Systems Division being responsible for the management of electronic systems and digital transformation.

Digital Developments and Technological Infrastructure

During 2025, the Agency achieved significant progress in the digital transformation of the institution, with important projects being developed and implemented in the field of information technology. The key digitalization projects developed during this period are as follows:

Development of the new electronic system, DMSA (Data Management System of the Agency) – This system was developed using Microsoft technology, within the Microsoft Visual .Net 8 framework of 2025, and the latest MS SQL Server technology. The system was developed by applying advanced security technologies, electronic data exchange mechanisms with state systems, data encryption and secured end-to-end communication. The new DMSA system has upgraded the technology of the modules of the previous system and has added functions within them, while new modules have also been developed. The main modules of this system are:

- DMSA Admin, the module for administration of the entire system;
- Contact Points, the module for administration of contact officials in all institutions of Kosovo, including contact officials for asset declaration, gift declaration, internal whistleblowing reports, conflict of interest reports, integrity plan reporting, action plan reporting, and corruption risk assessment and evaluation (<https://pikatekontaktit.rks-gov.net>).
- e-Declaration, the module for electronic asset declaration through the web, which enables asset declaration for each declaring entity and is fully responsive and compatible with all modern browsers and mobile devices (<https://e-deklarimi.rks-gov.net>).
- DMSA Report Administration, the module that enables the administration, approval and rejection of reports submitted by contact officials regarding whistleblowing, conflict of interest, integrity plans, action plans, and corruption risk monitoring and assessment.
- DMSA Reports, which enables the generation of various statistical reports for all data contained in the system.

Development of the new electronic system DMSA/CMS (Data Management System of the Agency / Case Management System) – This system was developed within the same project as the DMSA system. It enables the management of Agency cases through dedicated modules, such as:

- The Full Verification and Asset Control Module, which enables the electronic verification of assets, the assignment of cases for verification, the preparation of final investigation reports and their submission to other relevant institutions. During the verification process, the system retrieves data from other relevant state systems.
- The Fine Imposition Module, which enables the automatic verification of non-declaration of assets and late declaration, while enabling the management of the imposition of fines and warnings for declaring entities and contact officials.
- The Gift Inspection Module, which enables the verification and inspection of gifts in institutions.

Development of the mobile application for the electronic asset declaration module - e-Declaration, namely a mobile application for Android and iOS, which may be used by declaring entities to submit their asset declarations to the Agency through a mobile phone.

Development of the open data platform, “APK – OPEN DATA”, a platform developed for the publication of data from asset declaration registers also in open formats such as Excel and CSV files.

Advancement of the “Report Corruption” platform, now a platform widely used by citizens for reporting corruption and assessed by relevant international actors as a qualitative and user-friendly platform, and proposed as a model for other countries as well, through the development of additional functions and statistical reports. The financial sponsor of this platform was the SAEK III Project, UNDP Seoul. This platform consists of two main modules, namely:

- Report, which enables the reporting of corruption cases concerning:

- Whistleblowing,
- Conflict of Interest,
- Non-declaration (false declaration) of assets or gifts, and
- Other types.
- Report-CMS, which enables the handling of each reported case from the stage of receipt to its finalization, thereby providing a final outcome.

The Report Corruption platform interactively and in real time informs the reporter of the stage at which the report stands and of the actions taken by the Agency during the examination of the case. This communication is carried out through the platform by using the unique identification number of the reported case.

Implementation of the critical infrastructure project and domain change. New technology for the critical infrastructure of the Agency's servers and data has been developed and implemented, by migrating to 'Cluster' technology and to the new apk.rks domain. On this occasion, the latest technology was applied for:

- Server, storage and backup solution; and
- All Agency users were migrated to the latest versions of MS Windows, MS Office and Sophos antivirus.

Development and implementation of the fixed telephony digitalization project. In coordination with, and with the support of, the Agency for Information Society (AIS), we implemented the project for the digitalization of official fixed telephony, migrating from the analogue system to the digital voice-over-IP (VoIP) system.

The Agency's website, <https://apk-rks.net> in order to enhance security and performance due to the heavy load arising from the large volume of asset declaration data, has been hosted on cloud technology, specifically Microsoft Azure.

In addition to the aforementioned technology projects, several other activities were also carried out, such as the procurement of computers, laptops and a professional scanner for the digitization of the Agency's archival documents since its establishment. For the implementation of the digitization of the Agency's old archived documents, a procurement project was also carried out to double the electronic data storage capacity in the Agency's server room, through the purchase of several storage disks.

During the reporting period, the management and administration of the Agency's current electronic systems were also successfully carried out, such as: DMSA and DMSA/CMS, ADRS (the asset declaration and registration system), etc. The administration and maintenance of the computer network and infrastructure, as well as the continuous technological upgrading of operating systems and applications for Agency users, took place throughout the year. The figure below graphically presents the implementation of information technology projects and activities during 2025 by nature or type. In terms of new developments, we have three systems (DMSA, DMSA-CMS, and VoIP), seven modules, three

platforms, one mobile application (e-Declaration), and two hardware projects. Upgrades were made to the reporting system, in four modules of the current systems, and one in the server room (hardware). Meanwhile, management, administration and maintenance were carried out for the Agency's current technological systems, both new and old.

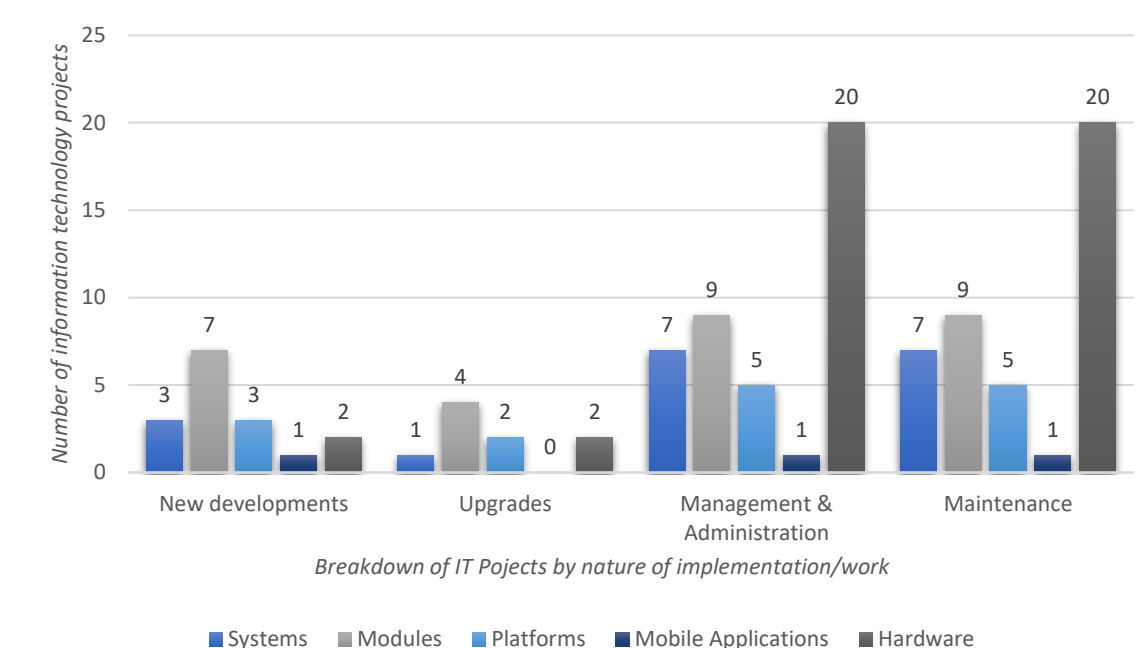


Figure 1. Graphical presentation of key information technology projects and activities

Digital transformation over the years

The Agency has undertaken a fundamental digital transformation of its work processes. It now performs nearly all of its core work processes electronically, starting from the lists of declaring entities, the asset declaration of public officials, the verification and full control of assets, the electronic reporting of cases and their handling through to finalization in areas such as conflict of interest, whistleblowing, declaration of assets and gifts, integrity plans, monitoring and corruption risk assessment in a given sector, etc. This digital transformation has gained significant momentum over the last four years, with the full digitization of work and the application of artificial intelligence forming a part of the Agency's development strategy.

The following figure graphically presents the technological development in the Agency as part of its digital transformation over the years, where the number of modules providing the Agency's digital services in 2025 was 13, compared to only one in 2022. This means that, in terms of the provision of electronic services, from 2022 to 2025 the number of digital modules increased by 1200%, whereas compared to 2024 it increased by 85.70%. This growth has accelerated case verification, enhanced transparency and reduced the operational time of the Agency's sectors.

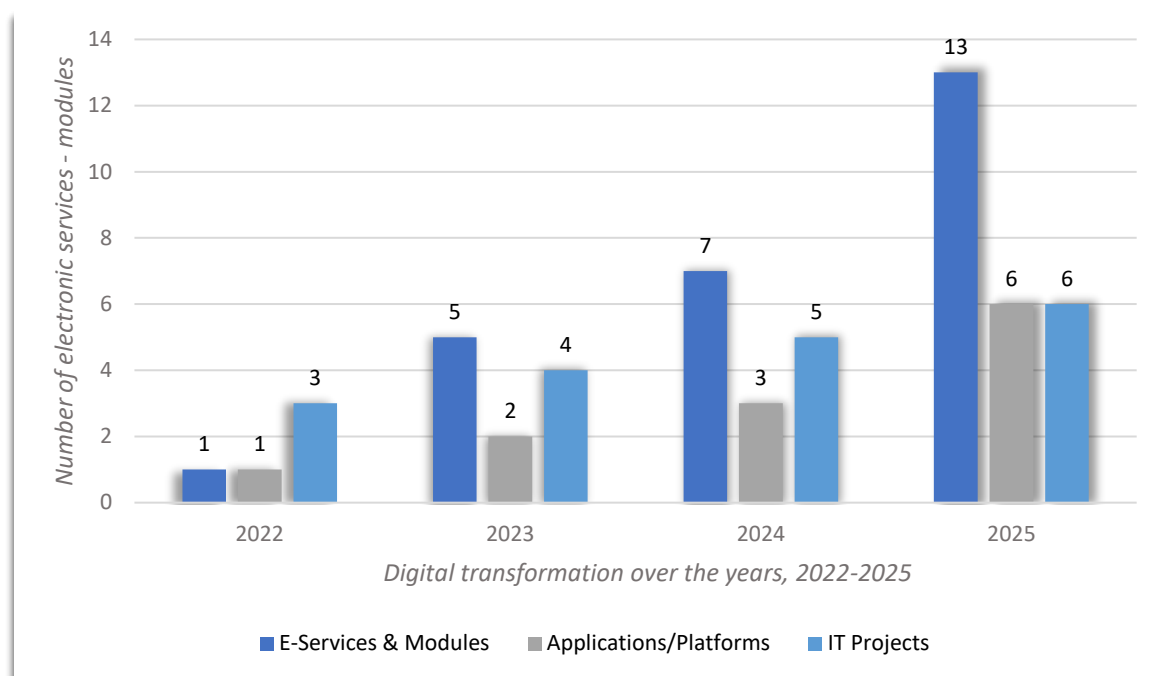


Figure 2. Ratio of the Agency's digital transformation for the period 2022 – 2025

Consequently, during 2025, the Agency attained a new level of digital transformation by creating a sustainable electronic ecosystem of its work processes. The new systems, advanced infrastructures, inter-institutional integrations and the increased number of electronic services position the Agency as a modern, efficient institution oriented towards innovation and artificial intelligence. These developments constitute the strategic foundation for projects in the years ahead.

HANDLING CASES OF CONFLICT OF INTEREST

Also during 2025, the prevention and management of conflict of interest situations remained one of the key components to which the Agency devoted particular attention regarding the manner and procedure of handling and managing cases. In this regard, the Agency continued to fulfil its duties and responsibilities and undertook all necessary measures to identify, prevent and manage conflict of interest 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 January - December 2025, for the purpose of preventing reported, suspected or alleged conflicts of interest, a total of 174 cases were presented.

Compared to previous years, specifically over the last three years, in 2023 there were 214 cases, in 2024 there were 220 cases, whereas in 2025 there were a total of 174 cases.

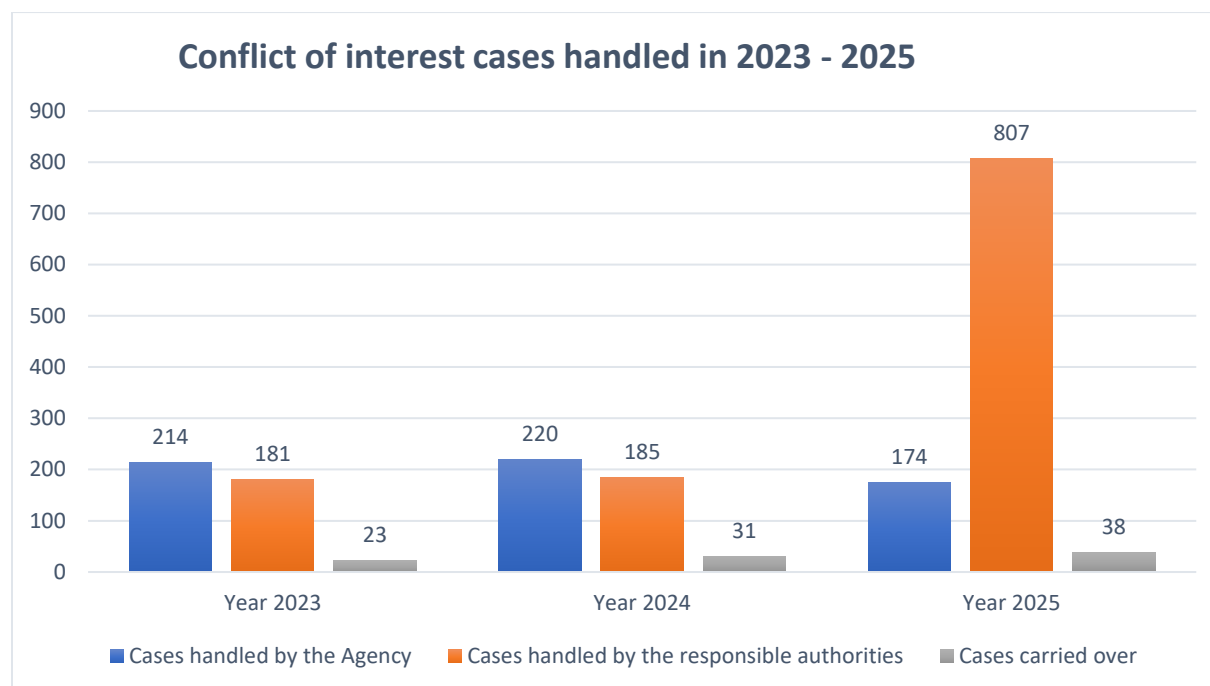


Figure 3. Graphical presentation of conflict of interest cases handled in the period 2023-2025

ASSET DECLARATION

Asset declaration is a highly important mechanism that contributes to increasing transparency and combating corruption in the public sector. The asset declaration process during 2025 was also characterized by increased responsibility of senior public officials to fulfil this legal obligation within the statutory deadlines.

In 2023, upon the entry into force of Law No. 08/L-108, the number of declaring entities doubled and it was stipulated that declaration be carried out exclusively in electronic form, thereby ensuring a faster, more accurate and more secure process.

Referring to the declared data for the last three years, in 2023, 99.60% of the entities fulfilled the legal obligation to declare assets, reflecting a significant increase in awareness and commitment. In 2024, also taking into account the two newly included categories within the legal obligation for asset declaration, namely doctors and professors, out of a total of 11168 declaring entities, 11070 or (99.12%) complied with the legal deadline, while 98 or (0.88%) failed to comply with the legal deadline.

Whereas in 2025, referring to the data reported by 12682 declaring entities, 12488 or (98.47%) complied with the legal deadline, while 194 or (1.56%) failed to comply with the legal deadline.

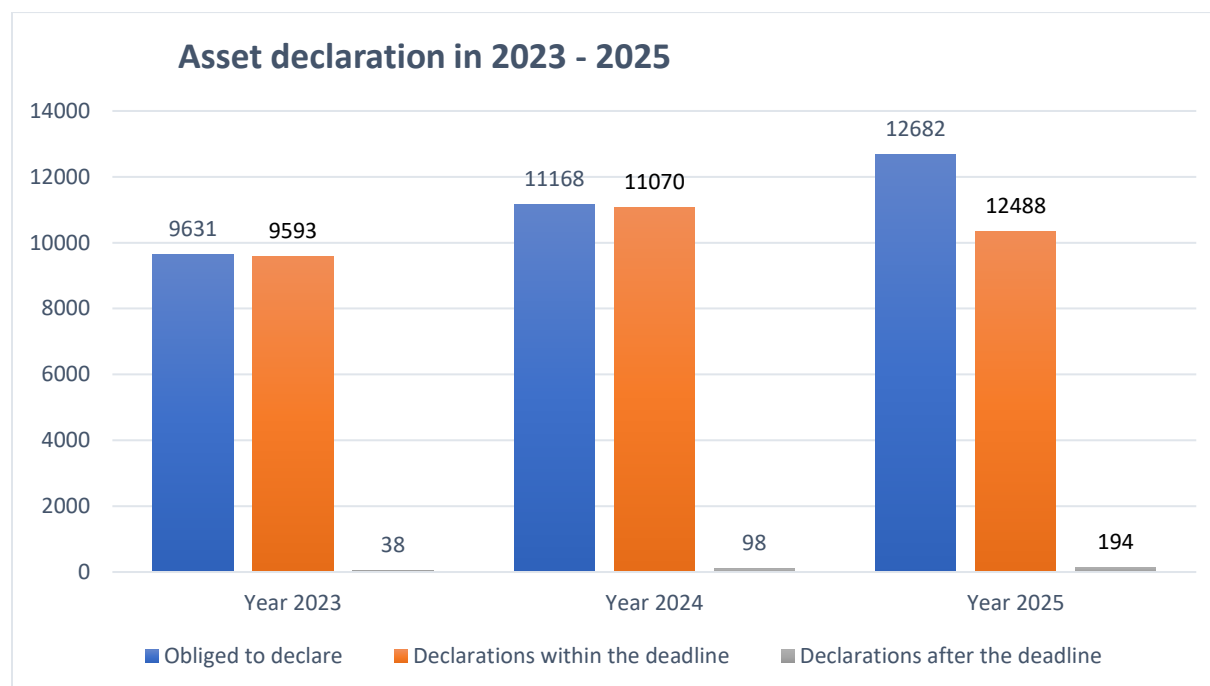


Figure 4. Graphical presentation of asset declaration for the period 2023-2025

HANDLING OF WHISTLEBLOWING CASES

Oversight of the whistleblowing process and the taking of necessary measures for the protection of whistleblowers, as one of the Agency's principal responsibilities, has been carried out in accordance with the applicable legislation, namely Law No. 06/L-085 on Protection of Whistleblowers, as well as Regulation No. 03/2021 on Determining the Procedure for Receiving and Handling Whistleblowing Cases.

Through this Report, the Agency presents detailed work over one year regarding whistleblowing cases in public institutions, private entities, as well as cases of handling external whistleblowing by the Agency itself, including the numerous activities undertaken within the process, the number of cases handled and the actions taken in relation to those cases.

During 2025, the Agency received and recorded a total of 92 reports/external whistleblowing cases. From 20 cases received in 2023, the number of cases rose to 48 in 2024, while during 2025 it reached 92 cases, thus, this shows that the number of cases in 2025 increased by approximately 91.7% compared to 2024. This increase may be interpreted as a positive sign for the whistleblowing culture and the confidence that citizens have in reporting suspicious or unlawful activities, relying on the protection afforded by the Law on Protection of Whistleblowers.

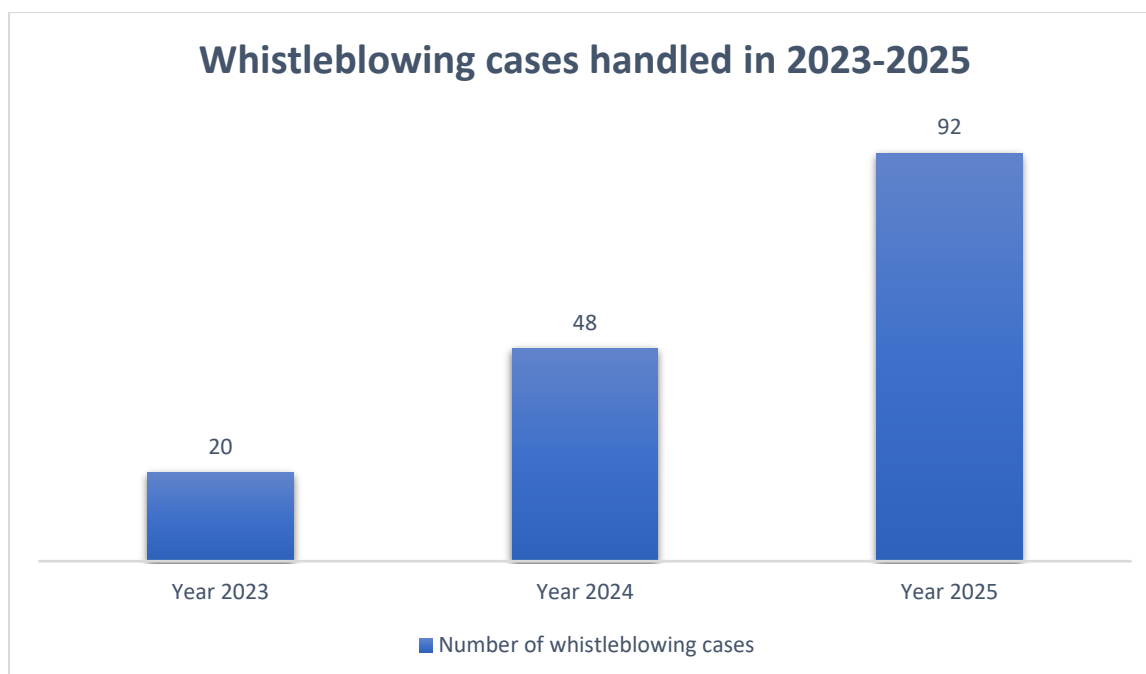


Figure 5. Graphical presentation of whistleblowing cases handled in the period 2023-2025

IMPLEMENTATION OF ANTI-CORRUPTION LEGISLATION AND ITS AMENDMENT AND SUPPLEMENTATION

During 2025, the Agency continued its mission towards the implementation of legislation and its improvement, through the adoption of bylaws as well as important strategic documents such as regulations, methodologies and practical guidelines, thereby fulfilling its obligations in terms of supplementing and fully implementing the applicable legislation. The activities of the Agency are based on the following laws:

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

Within this framework, the Agency continued to supplement the legal framework and to adopt bylaws and strategic documents, as follows:

- Regulation No. 01/2025 on the Procedure for Verification and Control of Asset Declaration by the Agency for Prevention of Corruption;
- Regulation No. 02/2025 on Internal Organization and Systematization of Jobs in the Agency for Prevention of Corruption;
- Regulation No. 04/2025 on the Acceptance and Registration of Gifts by Official Persons.

- Administrative Instruction No. 02/2025 on the Use, Utilization and Management of Vehicles in the Agency for Prevention of Corruption.
- Administrative Instruction No. 03/2025 on the Use of Telephony (fixed, VoIP and mobile) in the Agency for Prevention of Corruption.

Depending on the needs and various legal requirements, numerous legal submissions (decisions, requests, replies, contracts, memorandums of understanding) were drafted, while, additionally, various replies, opinions and professional advice were provided to all organizational units within the institution in analysing various issues within the institution's mandate, as well as other activities falling within the scope of 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 forwarded for further proceedings to the competent justice institutions, namely the State Prosecution Offices/Office of the Chief State Prosecutor as well as the Courts, a total of 19 criminal reports and 78 pieces of information, while 11 other cases were referred to the Minor Offense Court.

During the reporting period, a total of 43 criminal reports filed by the Agency were rejected by the prosecution offices, with the majority of these decisions being based on the legal interpretation given in Judgment Pml. No. 73/2024 of the Supreme Court of Kosovo.

More specifically, during 2025, the Agency received a considerable number of rulings on the termination of investigations from the Basic Prosecution Offices, which were expressly based on this Judgment of the Supreme Court. Likewise, in several other cases relating to criminal reports filed by the Agency, investigations were discontinued on the basis of the legal interpretation given by the Supreme Court, although without directly referring to that Judgment.

The essence of this legal interpretation is based on the implementation and reading of the provisions of a law that was repealed in 2014, which in practice has produced the effect of decriminalizing criminal offences related to non-declaration, false declaration or inaccurate declaration of assets and gifts.

Such an approach has not only created legal uncertainty, but has at the same time jeopardized the fulfilment of the Agency's legal mission in the field of declaration of assets and gifts, by weakening the preventive and punitive function of the relevant norms.

Furthermore, during this period, three (3) court judgments were also received, which followed the same legal reasoning as that established in the above-mentioned Judgment of the Supreme Court, thereby consolidating in practice an interpretative standard with direct consequences for the criminal treatment of these offences.

STATISTICAL INFORMATION ON DECISIONS CONCERNING CASES REFERRED BY THE AGENCY

Based on the information received during 2025 from the respective Courts regarding suspected corruption cases under indictments filed by the competent Prosecution Offices on the basis of criminal reports filed by the Agency, 3 judgments of conviction and 4 judgments of acquittal were issued.

No.	Court	Judgment of conviction	Judgment of acquittal	Rulings
1	BC Prishtina	1	2	0
2	BC Prizren	0	-	-
3	BC Gjilan	0	-	-
4	BC Gjakova	0	2	-
5	BC Mitrovica	2	0	-
TOTAL		03	4	0

Table No. 3 reflects the data from court decisions concerning Article 430 of Criminal Code of Kosovo No. 06/L-074.

By judgments of conviction, the Courts have primarily imposed fines, and there have also been cases where suspended sentences were imposed (fines and imprisonment).

Punishments by fines were imposed in the amount of EUR 250. These punishments were generally ordered to be paid after the judgments became final, with the possibility of revocation into a sentence of imprisonment, whereby EUR 20 shall be calculated as one day of imprisonment if the accused fails to pay and the same cannot be enforced compulsorily.

Suspended sentences were mainly imposed with terms of imprisonment ranging from 3 to 6 months.

The judgments of conviction refer to the criminal offence under Article 430 of Criminal Code of Kosovo No. 06/L-074. There are a total of 3 cases of conviction, of which 2 cases concern failure to declare assets under paragraph 1 of this Article, namely failure to submit the regular annual declaration of assets, and 1 case concerns false declaration of assets or failure to present the required data in the declaration under paragraph 2 of this Article.

By judgments of acquittal, there are a total of 4 cases. In 3 cases, the Court acquitted the accused of the charge of failure to declare assets under paragraph 1, and in 1 case for false declaration of assets under paragraph 2.

There was only 1 judgment issued by the competent court imposing a fine in relation to Conflict of Interest.

REPRESENTATION OF CASES BEFORE THE COURTS

During 2025, the Agency represented a total of 19 cases initiated before justice institutions, of which 11 cases were of a criminal nature, while 8 of these cases were of a legal-civil nature. In one case, the Agency represented before the Special Prosecution Office. The criminal matters in respect of which the Agency represented before the Courts and the Prosecution Offices concerned the criminal offence of: "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 was carried out at various stages, depending on the phase in which the proceedings in the respective cases were being conducted.

PREVENTION OF CONFLICT OF INTEREST IN THE DISCHARGE OF PUBLIC FUNCTIONS

One of the fundamental pillars of the functioning and fulfilment of the mandate of the Agency for Prevention of Corruption is the prevention of conflict of interest in the discharge of public functions. During 2025, the Agency continued to exercise its competences and responsibilities under the law by undertaking administrative investigative actions to address conflict of interest cases. Depending on the nature of the cases handled, the Agency provided official advice and replies, and issued recommendations, opinions and concrete decisions, in accordance with the provisions of Law No. 06/L-011 on Prevention of Conflict of Interest in Discharge of a Public Function.

A particular contribution to the fulfilment of the objective of preventing conflict of interest in the discharge of public functions was also made by the responsible authorities within the public institutions of the country. To this end, the Agency for Prevention of Corruption, through its internal mechanisms, continuously provided professional support to institutions/responsible authorities, by preparing and developing them as effectively as possible, so that the identification, handling and resolution of conflict of interest cases could be undertaken at the source, within their respective institutions.

The Agency's actions in the service of preventing conflict of interest in the discharge of public functions were undertaken objectively, impartially and professionally, all while consistently applying the relevant applicable legislation. This is usually carried out through the initiation of cases ex officio, on the basis of information received from natural or legal persons, information received anonymously, as well as information from the public. These actions are undertaken primarily in implementation of the law, but also with the purpose of strengthening institutional integrity and transparency in the Republic of Kosovo.

During the reporting period January - December 2025, for the purpose of preventing reported, suspected or alleged conflicts of interest, a total of 174 cases were presented.

In addition to the 174 cases handled, the Agency, through its official electronic address, also provided a considerable number of replies on matters of conflict of interest and incompatibilities that were addressed by various officials and institutions. During 2025, a total of 116 replies were provided to parties through the Agency's official address (info.apk@rks-gov.net) regarding the questions and requests submitted.

Compared to previous years, specifically the last three years, during the reporting period January - December, the Agency continued with approximately the same pace in terms of the number of cases handled for the prevention of conflict of interest, particularly with regard to providing replies on specific situations related to suspicions of incompatibility or the exercise of functions under conditions of conflict of interest.

The outcome of the cases handled by the Agency during the reporting period is as follows: in 73 cases replies and opinions were issued, 63 decisions were rendered in respect of cases. In 8 of them, the entities handled by the Agency avoided the conflict of interest, while 46 cases were found to involve no conflict of interest. Two other cases were referred for further proceedings to the State Prosecution Office, 7 cases were referred to the competent Minor Offense Court, and 38 cases were carried over to the following year.

It is worth noting that, in addition to the above-mentioned reports and requests for the handling of allegations of conflict of interest, 5 cases were addressed to the Agency for final assessment of the conflict of interest by law enforcement institutions, such as the State Prosecution Office 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	1	0	0	0	0	1	0
Government (Min., Ag., Uni.)	92	3	22	3	1	42	22
Courts	2	1	0	0	0	0	1
Prosecution Offices	4	0	0	0	0	4	0
Independent Institutions	28	1	4	1	0	13	7
Publicly Owned Enterprise	16	2	4	0	0	6	3
Local Government	31	1	16	3	1	7	5
Total	174	8	46	7	2	73	38

Table no. 4 shows the cases handled by the Agency in 2025

According to the Law on Prevention of Conflict of Interest (No. 06/L-011), specifically Article 20 thereof, from the perspective of the obligations concerning the handling of conflict of interest by the responsible authorities of public institutions, which include the direct supervisors of officials according to the hierarchy and the designated authorities within institutions, the year 2025, for the majority of institutions, was characterized by an approximately similar trend in the number of cases handled, with one marked exception in terms of the number of cases handled by the Kosovo Judicial Council.

Institution	Cases submitted	Cases of avoided CI	Cases without CI	Cases of conflict of interest/disciplinary procedure	Opinions Responses	Cases in procedure	Cases sent to the APC
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	to the APC						
Presidency	1	0	0	0	0	0	1
Assembly of Kosovo	0	0	0	0	0	0	0
Government (Min., Agen., Uni.)	112	41	8	3	40	2	18
Courts	625	497	125	2	0	0	1
Prosecution Offices	0	0	0	0	0	0	0
Independent Institutions	43	29	3	2	9	0	0
Publicly Owned Enterprise	9	3	1	1	2	0	2
Local Government	17	12	0	1	0	0	4
Total	807	582	137	9	51	2	26

Table no. 4 reflects the specifics of cases handled by the responsible authorities in 2025

As regards the reports submitted by the Responsible Authorities, of the 172 institutions that reported, a total of 807 cases were identified and handled in 49 public institutions.

In this context, compared to the last three years, there has been an upward trend from year to year in the number of cases handled by the Responsible Authorities, as follows: in 2023, 181 cases were handled; in 2024, a total of 185 cases were handled by the Responsible Authorities, whereas for the reporting year, the Responsible Authorities handled 807 cases.

Activities to strengthen and empower responsible authorities

With a view to ensuring the earliest possible awareness of the obligations, measures and methods for the prevention of conflict of interest, as well as to increasing inter-institutional cooperation, during 2025 the Agency conducted several important trainings in public institutions across the country. It is worth highlighting here the training delivered to the entire staff of the National Audit Office (NAO), including its senior management, which was held at the request of the NAO itself.

This training was conducted over four working days within the framework of the regular trainings organized by the NAO, and the topic "The obligation to prevent conflict of interest, the legal framework and procedures" was incorporated therein.

It should also be emphasized that training was held with two groups of selected Responsible Authorities in Peja, under the topic "The importance of preventing conflict of interest at source".

These trainings were highly valued by all participants and, as a result, the Agency received valuable input for orienting and improving its preventive strategies for the coming years.

During 2025, the Agency also conducted visits to various public institutions in the country, within the framework of which meetings were held with the Responsible Authorities appointed for the prevention and resolution of conflict of interest in those institutions, and from time to time also with their heads, including awareness-raising campaigns in schools and faculties.

At these meetings, Agency officials were informed of the challenges and efforts being undertaken by institutions such as the NAO, UP, UCCK, KEK, etc., in order to identify and address conflict of interest cases within their respective institutions as early as possible. Meanwhile, requests have still remained open, to be realized during this year, with the Treasury Office, the Agency for Comparison and Verification of Property, the academic units of the University of Prishtina, etc.



It is likewise worth noting the full-day activity organized within the “Anti-Corruption Week” with panelists and participants (the responsible authorities of institutions) in relation to the discussion topic “Prevention of conflict of interest in higher education”.

ANALYSIS:

Further on, namely this year as well, the number of requests for the handling of conflict of interest, namely incompatibilities in the discharge of public functions, continues to remain high. This is due to the fact that, during this reporting year as well, there were movements through elections and appointments to managerial positions in public institutions and public enterprises in the country, but on the other hand, also because the Agency is now seen and understood externally as a highly credible and professional address for the assessment and handling of situations suspected of conflict of interest and incompatibility.

Thus, the large number of requests for handling situations suspected of incompatibility and conflict of interest demonstrates the continuously increasing trust and readiness of public officials and citizens to address these matters to the Agency for Prevention of Corruption, as the specialized institution for dealing with such issues.

What ought to be emphasized for this year, and which is encouraging because it demonstrates a sound implementation of measures for the prevention of conflict of interest at source, is the fact that, for

example, a high number of conflict of interest situations were declared to and recorded by the Kosovo Judicial Council, which were then reviewed at the level of the KJC.

This is the best example of how, in fact, the Law on Prevention of Conflict of Interest should be implemented and how conflict of interest ought to be prevented at its source.

However, this good example has not been replicated across all public institutions. Despite the various awareness-raising activities organized throughout the year by the Agency, its continuous advisory support, as well as ongoing trainings on obligations, the manner of handling, and the procedures for the Responsible Authorities, hesitation is still observed within public institutions, with public officials or their direct supervisors failing to seek from, and place trust in, those authorities for the initial, and possibly joint, handling of such cases, as they are legally obliged to do. Many Responsible Authorities of institutions are bypassed, or are not activated at all to resolve conflict of interest cases within their institutions, and every request or situation faced by officials of various institutions is, without hesitation, directed straight to the Agency, whereas in fact the Agency ought to be involved only in exceptional or specific cases where its involvement is indispensable.

It should also be emphasized that, during this reporting year, 5 requests were forwarded to the Agency through the Kosovo Police for the handling of conflict of interest in cases that were 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 during 2025, there were decisions of various kinds, but always with the aim of avoiding decision-making under conflict of interest or incompatibilities in the discharge of public functions.

For example:

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

- **Seven (7)** requests before the competent courts for the initiation of minor offence proceedings against senior officials;
- **Five (5)** resignations from managerial functions in Non-Governmental Organizations;
- **Four (4)** resignations from managerial/leadership functions and/or from the position of authorized person in private businesses;
- **Three (3)** resignations from one public function due to incompatibility with another public function;
- **Three (3)** disciplinary procedures in the respective institutions against public officials due to C.I.;
- **Two (2)** minor offence cases against senior officials for violations of restrictions after leaving public office.
- **Two (2)** cases were initiated by criminal report before the competent Prosecution Office;

- **One (1)** Court Decision punishment by fine for a senior public official due to decision-making under conditions of conflict of interest.

DECLARATION BY TYPES

Based on the legal obligations laid down in Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, the Agency continued to oversee the asset declaration process of declaring entities in relation to assets declared through 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 obliged to submit a regular annual declaration of assets every year throughout the entire period of their service in the public sector, within the deadlines prescribed by law, and are obliged to declare the status of their assets to the APC from 1 to 31 March of each year for the preceding year, from 1 January to 31 December. For 2025, a total of 10485 declaring entities were obliged to submit the Regular Annual Declaration.

Out of the total number, 10344 declared their assets, while 141 declaring entities did not declare their assets within the prescribed deadline.

List of regular annual declaration by institutions

Institutions	Officials obliged to declare assets	Declared	Not declared
Presidency	23	22	1
Assembly	147	147	1
Government	3299	3181	118
Courts	570	567	3
Prosecution Offices	232	1	1
Independent Institutions	607	607	0
Municipalities of Kosovo	1196	1184	12
Publicly Owned Enterprise	524	519	5
TOTAL	10485	10344	141

For the reporting period January - December 2025, the overall status of the regular annual asset declaration process is presented in the following table, including comparisons with 2023 and 2024.

Years	Obligated to declare	Declared within the deadline	Failed to comply with the deadline
2023	4709	4698 (99.77%)	11 (0.23%)
2024	7906	7816 (98.86%)	90 (1.14%)
2025	10485	10344(98.66%)	141 (1.34%)

Table No. 6. Comparisons for 2023-2025 regarding the regular annual asset declaration process

Declaration upon Taking Office - Senior public officials who commence work in the public service are obliged to fully and accurately declare their assets within the legal deadline of 30 days from the date of assuming office.

During the reporting year, the Agency received information from contact officials regarding public officials who assumed office during this period and who, in accordance with the applicable legislation, were obliged to declare their assets.

A total of **1202** declaring entities were obliged to declare their assets upon taking office, of whom **1180** declared their assets within the prescribed timeframe, whereas **22** failed to declare their assets within the legally prescribed deadline.

For the reporting period January - December 2025, the overall status of the asset declaration process upon taking office is presented in the following table, including comparisons with 2023 and 2024.

Years	Obligated to declare	Declared within the deadline	Failed to comply with the deadline
2023	4377	4350 (99.38%)	27 (0.62%)
2024	3161	3153 (99.74%)	8 (0.26%)
2025	1202	1180 (98.16%)	22 (1.84%)

Table No. 7. Comparisons for 2023-2025 regarding the declaration process upon taking office

Declaration after termination or dismissal from office – Upon the termination of engagement in a public position, public officials are obliged to declare their assets within a period of 30 days.

During the reporting year, the Agency received information from contact officials that **995** declaring entities had terminated the discharge of their public function and were therefore obliged to declare their assets after leaving public office, of whom 2 declared their assets with delay.

As regards the comparative data concerning the asset declaration process after termination of public office for the last 3 years, namely 2023, 2024 and 2025, they are presented in the following table:

Years	Obligated to declare	Declared within the deadline	Failed to declare within the deadline
2023	545	545 (100%)	0 (0%)
2024	101	101(100%)	0 (0%)

2025	995	993 (99.8)	2 (0.20%)
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Table No. 8. Comparisons for the years 2023-2025 regarding the declaration process after termination of public office

Based on the data reported during 2025, for all types of asset declaration, 12682 senior public officials were obliged to submit declarations, as shown in the following table:

Type of declaration	Obliged
Regular annual declaration	10485
Upon taking office	1202
After termination or dismissal from office	995
Total number	12682

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

Pursuant to Law No. 08/L-017 on the Agency for Prevention of Corruption, Law No. 08/L-108 on 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, as well as in terms of implementing the provisions of Law No. 05/L-087 on Minor Offences.

For the regular annual declaration during 2025, the Agency imposed fines on 115 declaring entities in the total amount of EUR 32426.27, while in 20 cases it imposed the measure of “non-public reprimand” on declaring entities and contact officials, and in 6 cases it terminated the procedure against declaring entities due to their death or for other reasons.

For declaration upon taking office and upon termination of office during 2025, the Agency imposed fines on 14 declaring entities in the total amount of EUR 4563.70, while in 17 cases it imposed the measure of “non-public reprimand” on declaring entities and contact officials.

Furthermore, during the month of December, the Agency continued the verification of the lists for declaration upon taking office and upon termination of office during 2025 and, after verification, established that approximately 55 declaring entities were delayed in the declaration process.

Likewise, during 2025, the Agency submitted 16 criminal reports against declaring entities that declared their assets late or failed to declare them altogether.

Number of punitive measures	
Criminal Reports	16
Fines	129

Public Reprimands	
Non-public Reprimands	37
Cases of death and others	6 Number of complaints during 2025

Table No. 10 reflects the data regarding punitive measures

Currently, we are in the process of verifying the lists of declarations upon taking office and upon termination of office for the period 20.11.2025 - 31.12.2025, concerning declaring entities that were delayed in declaring their assets or failed to declare them at all.

Report on the handling of complaints during 2025

During 2025, the Agency's Complaints Commission received a total of 57 complaints from declaring entities and contact officials concerning the Agency's decisions on the imposition of punitive measures. Following a detailed review by the Complaints Commission:

- 41 complaints were rejected;
- 4 complaints were partially approved;
- 9 complaints were approved with instructions to remand for review of the decision by the unit responsible for proposing the imposition of fines within the Agency;
- 3 complaints were fully approved;

Number of complaints 2025 in				
Rejected	Fully approved	Partially approved	Under reassessment	Total complaints
41	3	4	9	57

Table No. 11 reflects the number of complaints handled by the Complaints Commission of the Agency for Prevention of Corruption

FULL CONTROL 2025

CASES REFERRED BY THE AGENCY TO THE STATE PROSECUTION OFFICE

During the investigative procedure conducted within the framework of the full control of the assets of declaring entities, for the reporting period the Agency forwarded 17 criminal reports and 61 information to the Office of the Chief State Prosecutor for further review and handling.

These criminal reports and information concern actions sanctioned under Article 430 of Criminal Code of the Republic of Kosovo No. 06/L-074, "Failure to report or falsely reporting property, revenue/income, gifts, other material benefits or financial obligations".

STATISTICAL INFORMATION ON DECISIONS CONCERNING CASES REFERRED BY THE AGENCY

Based on the information received during 2025 from the State Prosecution Office regarding suspected corruption cases based on suspicions alleged by the Agency, 43 rejection rulings (dismissal of indictments or termination of investigations) were issued.

ASSET CONTROL

According to Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts, the Agency carried out full control of the asset declaration forms submitted by the declaring entities. Throughout the entire period, the Agency remained committed to handling cases within the prescribed time limits, however, bearing in mind the technical issues related to the conduct of control through the DMSA-CMS electronic system, the process of collecting information from relevant institutions concerning the verification of asset declarations submitted to the Agency by declaring entities commenced with delay. In 2024, all full control cases, namely 1321 cases, were carried over into 2025 due to staff shortages and the high volume of work during the year, and as a result the control process began with delay. In 2025, 253 cases, according to the control list, as well as 7 cases based on information received at the end of the calendar year, were carried over into 2026. During 2025, full control commenced for 1504 declaring entities, pursuant to Article 18 of Law No. 08/L-108, for the categories determined by Articles 4 and 5 of the Law. Likewise, for 20 other declaring entities, full control commenced based on information received concerning suspicions of inaccurate asset declaration.

Cases carried over for asset control over the years

The data indicate a downward trend in the number of cases carried over from previous years, whereby from 2023 to 2024, 1716 cases were carried over, from 2024 to 2025, 1321 cases were carried over, whereas from 2025 to 2026, 260 carried-over cases were recorded. This decrease is assessed to be the result of increased work efficiency, improved internal procedures and the advancement of digitalization processes in the handling of cases.

Cases carried over for asset control over the years	
Cases carried over from 2023 to 2024	1716
Cases carried over from 2024 to 2025	1321
Cases carried over from 2025 to 2026	260

Table No. 12 reflects the data of the cases carried over for full control 2024-2025

Full control - Based on legal obligations, the Agency carried out the full control process of assets in order to verify the accuracy and authenticity of the data declared in the asset declaration forms for declaring entities who declare assets.

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

paragraph 1.38, with one-third of the declaring entities being subjected to control selection by lot. Pursuant to Article 5 of Law No. 08/L-108, 150 declaring entities were subjected to control selection by lot.

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

The cases carried over from 2024 to 2025 were concluded through the full control process, and from the total number of declaring entities subjected to full asset control, full control was completed for 1321 declaring entities, in accordance with the legal obligation establishing full control.

Number of cases carried over	Closed cases	Cases proceeded as criminal reports to the Prosecution Office	Cases proceeded as information to the Prosecution Office	Cases referred as non-public reprimands to declaring entities
1321	1246	17	58	38

Table No. 13 reflects the data from the full control regarding the cases concluded and carried over from 2024-2025.

During 2025, we also received information concerning 44 declaring entities, namely 12 cases from the media and third parties, and through the "Report Corruption" platform we received 32 cases. From the total number of reported cases, 20 cases were initiated, in 4 cases for which information had been received, the full control process was already underway and the received information was attached thereto, whereas 20 cases received through the platform did not meet the conditions for commencing full control.

Number of reported cases	Number of cases not initiated due to lack of grounds	Number of cases already under investigation	Number of cases for which control was commenced	Closed	Carried over into 2026	Cases proceeded as information
44	20	4	20	10	7	3

Table No. 14 reflects the data from the full control regarding the cases reported during 2025.

During 2025, asset control commenced for declaring entities pursuant to Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts. All declaring entities under Article 4, paragraph 1.1 through paragraph 1.18, as well as declaring entities under paragraph 1.19 through paragraph 1.38, with one-third of the declaring entities being subjected to control selection by lot.

By legal obligation	Closed	Carried over 2025
1504	1251	253

Table No. 15 reflects the data from the full control during 2025, as well as the results of the findings from the full control.

Years	Full control	Closed cases	Cases proceeded for criminal report and information	Cases carried over to 2024	Cases handled (ex-officio) according to anonymous information or NGO
2023	1735	19 (1.09%)	0	1716 (98.90%)	27
2024	1336	12	3	1321	12
2025	1504	1261	78	260	20

Table No. 16 reflects the data from the full control of assets for the three-year period 2023-2025.

DECLARATION OF GIFTS RECEIVED FROM INSTITUTIONS

Based on Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts and Regulation No. 05/2024 on the Acceptance and Registration of Gifts by Official Persons, institutions are obliged to appoint officials responsible for maintaining the gift register. All received gifts and their respective value, as well as the names of the persons who provided the gift, must be recorded in the gift register by the official person designated by the Agency and maintained by the institution in which the official person discharges his or her duty.

Cases handled

During the reporting period, 2 anonymous reports concerning the acceptance of gifts by official persons were received through the "Report Corruption" platform. All reports were registered and handled within the legal competences of the Agency. Following administrative review and examination, one case was closed by decision, while the other case remains under review.

Likewise, during 2025, the Agency received one (1) request for permission to accept a gift, which is currently under review and examination in accordance with the applicable legal provisions. During this reporting period, the Agency provided official responses to a total of 6 institutions regarding questions and requests for clarification on the implementation of the legal provisions governing the acceptance of gifts.

Submission of the gift form

For the reporting period, pursuant to the applicable legislation, the Agency received notifications/reports from 206 contact officials of institutions or publicly-owned enterprises that are obliged to submit the gift register to the Agency. Of these, 123 declared that no gifts had been received during the previous year, while 37 contact officials declared that gifts had been received in their institutions. Whereas 31 contact officials of institutions did not report at all. It is also worth noting that the Vushtrri Hospital did not appoint a contact official.

Institutions that submitted copies of the gift register during this year for the previous year

Assembly of Kosovo, President of the Republic of Kosovo (Office of the President), Constitutional Court of Kosovo, Office of the Prime Minister of Kosovo, Ombudsperson, National Audit Office, Central Bank of the Republic of Kosovo, Ministry of Internal Affairs, Ministry of Finance, Ministry of Economy, Kosovo Customs, Kosovo Police – Border Directorate, Agency for Prevention of Corruption, Agency for Information and Privacy, Kosovo Competition Authority, Agency for Gender Equality, Academy of Justice, Kosovo Deposit Insurance Fund, University Clinical Centre of Kosovo, Municipality of Ferizaj, Municipality of Peja, Post of Kosovo, Regional Water Company “Hidrodrini”.

The specified data concerning the gift registers, by institutions that submitted copies of the registers to the APC, are presented in the following table:

No.	Institutions	Protocol gift	Occasional gift	Total number
1	Assembly of Kosovo	4		4
2	Office of the President of the Republic of Kosovo	1	11	12
3	Constitutional Court of Kosovo	5		5
4	Office of the Prime Minister of Kosovo	44	33	77
5	Ombudsperson	1	1	2
6	National Audit Office	3		3
7	Central Bank of the Republic of Kosovo	71	37	108
8	Ministry of Internal Affairs	1		1
9	Ministry of Foreign Affairs	14		14
10	Ministry of Finance	2	2	4
11	Ministry of Economy		1	1
12	Kosovo Customs	2		2
13	Kosovo Police – Border Directorate	1		1
14	Agency for the Prevention of Corruption		9	9
15	Information and Privacy Agency	1		1
16	Kosovo Competition Authority		3	3
17	Agency for Gender Equality	1		1
18	Academy of Justice	2		2
19	Kosovo Deposit Insurance Fund	1	13	14
20	University Clinical Centre of Kosovo;	2		2
21	Municipality of Ferizaj	3	1	4
22	Municipality of Peja	1		1
23	Post of Kosovo	3	10	13
24	Regional Water Company “Hidrodrini”	1		1
25	Energy Regulatory Office		10	10
TOTAL		164	121	285

Table No. 17 regarding the gift registers by institutions that submitted copies of the registers to the APC

Institutions that declared they did not receive gifts during 2025

For 2025, we have a total of 123 institutions which declared that they did not receive any gifts at all, listed as follows:

Regional Water Company Gjakova J.S.C., Gjakova, Municipality of Kamenica (Dardana), General Hospital in Mitrovica, Kosovo Cadastral Agency, Food and Veterinary Agency, University of Applied Sciences in Ferizaj, Radio Television of Kosovo, Ibër-Lepenci – Central Public Enterprise, Public Enterprise Horticulture, Prishtina, Municipality of Malisheva, Municipality of Klinë, International Business College Mitrovica (IBCM), Municipality of Prishtina, State Prosecution Office, Ministry of Local Government Administration, Kosovo Judicial Council, University “Hasan Prishtina”, Prishtina, General Hospital in Peja, Regional Waste Company “Pastërtia”, Ferizaj, University “Isa Boletini”, Mitrovica, Police Inspectorate of Kosovo, Regional Waste Company “Uniteti”, Mitrovica, Public Enterprise “Urban Traffic”, Prishtina, Ministry of Culture, Youth and Sports, Kosovo Energy Corporation, Municipality of Zvečan, Emergency Management Agency, Municipality of Lipjan, Labour Inspectorate, Municipality of Shtime, Municipality of North Mitrovica, National Centre of Occupational Medicine, Gjakova, Independent Media Commission, Regional Water Company “Prishtina”, Local Public Enterprise “Sport Marketing” J.S.C., Prishtina, Kosovo Probation Service, Hidroregjioni Jugor J.S.C., Prizren, Mental Health of Kosovo, Agency for Free Legal Aid, University “Fehmi Agani”, Gjakova, University Dentistry Clinical Centre of Kosovo, Institute of History “Ali Hadri”, Prishtina, Public Municipal Enterprise “Ekologjia”, National Blood Transfusion Centre, General Hospital in Gjiçan, Municipality of South Mitrovica, Kosovo Accreditation Agency, Kosovo Pedagogical Institute, City Heating Company “Termokos”, Prishtina, Agency for Vocational Education and Training and Adult Education, Regional Waste Company “Pastrimi”, Prishtina, Ministry of Health, University “Haxhi Zeka”, Peja, Municipality of Partesh, Public Housing Enterprise, Prishtina, Municipality of Rahovec, Local Public Enterprise “Përparimi” J.S.C., Vushtrri, Municipality of Dragash, Regional Water Company “Bifurkacion”, Ferizaj, Municipality of Novobërdë (Artana), Regional Waste Company “Ekoregjioni”, Municipality of Hani i Elezit, Ministry of Agriculture, Forestry and Rural Development, Regional Waste Company “Ambienti”, Peja, Municipality of Junik, General Hospital in Ferizaj, Central Procurement Agency, Ministry for Communities and Returns, University “Ukshin Hoti”, Prizren, Municipality of Viti, National Centre of Sports Medicine, Employment Agency of the Republic of Kosovo, Municipality of Shtërpce, National Qualifications Authority, Agency for Medicinal Products and Medical Devices, Institute of Forensic Medicine, General Hospital in Gjakova, Kosovo Forestry Agency, National Centre for Telemedicine, Landfill Management Company, Independent Commission for Mines and Minerals, Education Inspectorate, Municipality of Gjakova, Kosovo Forensic Agency, Electoral Complaints and Appeals Panel, Municipality of Fushë Kosovë, Municipality of Podujevë, Irrigation Company “Drini i Bardhë”, Student Centre, Kosovo Pension Savings Trust, Tax Administration of Kosovo, Municipality of Vushtrri, Kosovo Council for Cultural Heritage, Kosovo Correctional Service, Telecom of Kosovo, Local Public Enterprise “Multifunctional Centre” J.S.C., Mitrovica, Municipality of Suharekë, Municipality of Zubin Potok, Ministry of Infrastructure and Transport, Kosovo Property Comparison and Verification Agency, Ministry of Environment and Spatial Planning, Department for European Integrations (former Ministry of European Integration), Local Public Enterprise “Prishtina Parking” J.S.C., Prishtina, Municipality of Obiliq,

Air Navigation Services Agency, Kosovo Agency of Statistics, Civil Aviation Authority, Regional Waste Company “Çabrat”, Gjakova, PE “Infrakos” J.S.C., Municipality of Deçan, Kosovo Academy for Public Safety, Municipality of Glllogoc (Drenas), PE “Trainkos” J.S.C., Institute of Albanology, Kosovo Police, Regional Directorate Prishtina, Regional Directorate Gjakova, Regional Directorate South Mitrovica, Regional Directorate North Mitrovica, Regional Directorate Prizren, Regional Directorate Peja, Regional Directorate Ferizaj, Regional Directorate Gjiilan.

Institutions that did not report

Kosovo Intelligence Agency, Procurement Review Body, Railway Regulatory Authority, Regulatory Authority of Electronic and Postal Communications, Public Procurement Regulatory Commission, Municipality of Gjiilan, Municipality of Kaçanik, Municipality of Istog, Municipality of Ranillug, Municipality of Leposavić, Local Public Enterprise Palace of Youth J.S.C., Local Public Enterprise Prishtina J.S.C., Public Enterprise Market South Mitrovica, Gjakova City Heating Plant, LPE Kastrioti J.S.C., Ambienti Ferizaj, Public University of Gjiilan, Agriculture Development Agency, Ministry of Justice, Agency for the Administration of Seized and Confiscated Assets, Regional Water Company Radoniqi, Regional Water Company Hidromorava J.S.C., Gjiilan, Trepça J.S.C., Ministry of Defence, General Hospital Vushtrri, General Hospital “Prim. Dr. Daut Mustafa” Prizren, Health Insurance Fund, Kosovo Hospital and University Clinical Service, Kosovo Institute for Public Administration (KIPA), State Archives Agency.

During the reporting period, the Agency also carried out the process of inspection and auditing of gifts by visiting 22 institutions in relation to the keeping and registration of gifts declared by the official persons of these institutions for the previous year, January-December 2024. This activity was carried out within the time period from 30.06.2025 to 15.08.2025.

Verification and control were also carried out with regard to the display of gifts, in accordance with the applicable legislation, in a special and accessible section for parties and the public. As a result, out of the 22 institutions visited, 21 had ensured designated gift display areas, while only 1 of these institutions had not ensured a designated gift display area.

The institutions that ensured a designated gift display area are: the Office of the President, the Assembly of Kosovo, the Office of the Prime Minister, the National Audit Office, the Academy of Justice, the Constitutional Court of Kosovo, the Ministry of Economy, the Ministry of Foreign Affairs and Diaspora, the Agency for Prevention of Corruption, the Central Bank of Kosovo, the Deposit Insurance Fund of Kosovo, the Ministry of Justice, the Ministry of Industry, Entrepreneurship and Trade, the Post of Kosovo, Telecom of Kosovo, Kosovo Customs, the Ministry of Internal Affairs, the University Clinical Centre of Kosovo - Kosovo Hospital and University Clinical Service, the Municipality of Ferizaj, the Municipality of Peja, the Supreme Court.

Whereas, the institution which had not ensured a designated gift display area is the Ministry of Internal Affairs.

ASSESSMENT OF RISK AND LEGAL ACTS AGAINST CORRUPTION

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

In exercising this competence, during the reporting year 2025, the Agency initiated the process of self-assessment of anti-corruption performance in the fields of: anti-corruption policies, conflict of interest, declaration of assets and interests, as well as the protection of whistleblowers. This process was conducted in accordance with the Guidelines prepared by the Anti-Corruption Network of the Organisation for Economic Co-operation and Development (OECD) for Eastern Europe and Central Asia, within the framework of the Istanbul Anti-Corruption Action Plan, 5th Monitoring Round (<https://apk-rks.net/news/apk-nis-procesin-e-vetevleresimit-te-performances-kunder-korrupsionit-sipas-standardeve-te-oecd-se/>).

Throughout this assessment, a series of important activities were undertaken for its development and for securing and collecting information and documentation from relevant state institutions, including data, questionnaire responses and supporting evidence.

The Guidelines was initially adapted to the Kosovo context, while further adaptation continued during the implementation phase as well.

Thereafter, the questionnaire was analysed, which likewise had to be adapted prior to its distribution to the relevant institutions, in order to ensure the collection of accurate and quality information and documentation concerning the specific indicators of the performance areas covered by this assessment.

State institutions were identified as entities capable of providing the information and documentation required under the above-mentioned Guidelines, with the aim of ensuring broad inclusion, and their responsible persons and contact details were also identified. The questionnaire was distributed to:

The Assembly of the Republic of Kosovo, the Constitutional Court of the Republic of Kosovo, the Kosovo Judicial Council, the Kosovo Prosecutorial Council, the National Audit Office, the Office of the Prime Minister, the Ministry of Justice, the Ministry of Foreign Affairs and Diaspora, the Ministry of Internal Affairs, the Ministry of Local Government Administration, the Tax Administration of Kosovo, Kosovo Customs, the Kosovo Police, the Police Inspectorate of Kosovo, the Kosovo Correctional Service, the Kosovo Probation Service, the Agency for Free Legal Aid, the relevant units of the Agency for Prevention of Corruption, as well as the 7 (seven) Basic Courts at the level of the Republic of Kosovo together with their branches.

The distribution of the questionnaire was accompanied by the contacting of the responsible persons of the institutions, who were asked to confirm receipt thereof. The institutions were responsible for completing the questionnaires and providing supporting evidence. The fifteen (15)-day deadline for responses was regarded as flexible, in accordance with the specific requests and needs of certain institutions. Throughout the entire process, the responsible officers of the Agency maintained regular contact with the relevant officials of the institutions, with a view to ensuring and collecting the most accurate and high-quality information and data possible.

An important part of the process included the provision of continuous support to institutional representatives in completing the questionnaires, through the organization of six (6) meetings to explain the Guide, the questionnaire and the importance of the assessment. These meetings also served to inform representatives of state institutions of their role in the process, as well as to engage them in completing the questionnaire and providing the necessary data.

Following the collection of information (questionnaire responses, data and supporting evidence) from the relevant institutions, during the following year (2026) the initiated process of verification and analysis of the secured data, as well as the preparation of the assessment results, will continue. The assessment also envisages the involvement of civil society, which will bring added value.

Assessment of legal acts against corruption

The assessment of legal acts against corruption is also envisaged as a preventive measure, which, according to Article 27, paragraph 1 of Law No. 08/L-017, includes the identification and assessment of risks and gaps in draft laws, draft bylaws, legal acts and implementing bylaws, which may potentially increase corruption, as well as their compliance with international anti-corruption standards.

For 2025, the Agency, on its own initiative and in accordance with the provisions of Article 27 of Law No. 08/L-017, and based on the Methodology for corruption assessment in legislation, approved by the Agency in 2023, developed the orientation plan for the purposes of this assessment, by identifying the draft acts and normative acts to be assessed.

The results of the corruption risk mapping carried out by the Agency in 2024 guided the development of the assessment plan in the sectors scored as more sensitive and more exposed to corruption. The draft acts and normative acts were identified through careful analysis of the Legislative Programme of the Government of the Republic of Kosovo for the years 2025–2027 and the Plans of Sub-Legal Acts, as well as after holding four (4) official meetings with the responsible officials of the Legal Departments of the sponsoring ministries.

The draft acts and normative acts identified for assessment are listed as follows:

- Law on Publicly-Owned Enterprises (provisions on the selection of the CEOs of Publicly-Owned Enterprises);
- Law No. 08/L-249 on amending and supplementing Law No. 06/L-056 on the Kosovo Prosecutorial Council
- Draft Law on Amending and Supplementing Law No. 06/L-055 on the Kosovo Judicial Council;

- Regulation (GRK) No. 03/2025 on the Conditions of Transfer of Ownership of Public Property and the Leasing of Items in Public Ownership;
- Administrative Instruction GRK - No. 06/2018 for Implementation of Central Public Procurement Procedures;
- Administrative Instruction No. 01/2019 on Determining the Procedures for the Preparation and Review of Requests for Construction Conditions, Building Permit and Demolition Permit for Category III Constructions;
- Administrative Instruction MMPHI No. 03/2024 on the Criteria for the Selection of Landfill Locations as well as the Technical Conditions according to their Designated Purpose;
- Draft Administrative Instruction on Amending and Supplementing Administrative Instruction (MMPHI) No. 04/2022 on Environmental Permit;
- Draft Administrative Instruction (MIET) No. 00/2025 on Determining the Standards and the Method of Verifying the Quality of Fuels and Petroleum Products;
- Draft Administrative Instruction on the Content and Method of Keeping the Register of Issued Permits;
- Draft Administrative Instruction on the Procedure for the Promotion of Police Personnel.

With the exception of the Draft Administrative Instruction on the Procedure for the Promotion of Police Personnel, all others were assessed, and the Opinions with recommendations were forwarded to the respective sponsoring authorities.

(According to the notification of the Ministry of Internal Affairs dated 21.08.2025, the Legal Department forwarded for signature to the Office of the General Secretary the decision on the establishment of the working group for the Draft Administrative Instruction on the Procedure for the Promotion of Police Personnel. In view of this, no specific draft was made available to the Agency for assessment and we remain awaiting notification regarding the drafting thereof by the Ministry of Internal Affairs.)

During the assessment process, the Agency requested the necessary information from the sponsoring and implementing institutions of the draft and normative acts, which provided their cooperation. Among other things, the assessment also included the analysis of the legislation in force and repealed legislation, as well as any other domestic and international document of relevance.

In the last quarter of the reporting year, the Agency received a request for assessment from the Ministry of Environment, Spatial Planning and Infrastructure in relation to the Draft Law on Nature Protection, the assessment of which continues at the beginning of 2026.

Integrity Plans

During 2025, the Agency played an important role in strengthening institutional integrity mechanisms. This contribution was realized through monitoring the implementation of Integrity Plans, advancing the methodological and strategic framework in the field of corruption prevention, supporting and building the capacities of public institutions, as well as through active participation in the process of updating the Integrity Plans of the responsible institutions.

Within the framework of the regular implementation of the monitoring and reporting mechanisms of Integrity Plans, during July 2025, the reporting process for the period January–June 2025 was initiated. On this occasion, the officials responsible for integrity in public institutions were sent an official electronic notification, through which they were instructed, in accordance with the Guide on Monitoring and Reporting on the Implementation of the Integrity Plan, to prepare and submit written reports on the outcome of the implementation of the measures set out in the Integrity Plan.

The institutions were informed that the reports had to be submitted to the Agency for Prevention of Corruption by 31 July 2025, while the amended and supplemented Guide dated 19.08.2024 was used as the mandatory reference document. This process served as a basis for assessing institutional progress, identifying challenges in the implementation of integrity measures and ensuring analytical data.

The reports received were processed and analysed, thereby contributing to the creation of a clear overview of the actual state of implementation of Integrity Plans at the institutional level.

The analysis carried out shows that:

- 108 institutions reported regularly and within the legal deadline;
- 15 institutions did not submit reports at all;
- 1 institution had its report rejected due to methodological inconsistencies;
- 15 institutions did not draft Integrity Plans;
- 13 institutions reported, but their reports require substantive updating.

These data demonstrate a satisfactory level of institutional involvement, while at the same time highlighting structural shortcomings in quality, implementation and reporting.

The institutions that failed to submit their semi-annual reports within the legal deadline are: Kosovo Accreditation Agency; Kosovo Metrology Agency; Agency for the Administration of Seized or Confiscated Assets; Central Procurement Agency; Food and Veterinary Agency; Central Labour Inspectorate; Central Election Commission; the Municipalities of Dragash, Gjakova, Hani i Elezit, Partesh, Prishtina and Zveçan; “Kadri Zeka” University of Gjilan; Kosovo Institute for Protection of Monuments. Failure to report constitutes a breach of legal and methodological obligations and adversely affects the assessment of institutional progress.

Based on the reporting process, the Agency drafted two analytical documents: the Summary of Reporting January–June 2025, which reflects the level of fulfilment, progress, challenges and the need for corrective interventions, as well as the Integrity Index across Municipalities, an analytical instrument for the comparative assessment of municipalities with regard to the implementation of Integrity Plans, transparency and preventive anti-corruption measures.

With a view, inter alia, to improving the quality of the updating of Integrity Plans for 2026, during the period 21–23 October 2025, the Agency organized one-day workshops for officials responsible for integrity from more than 100 public institutions. The workshops were interactive in nature and addressed

the steps, deadlines, reporting, monitoring, key challenges in the implementation of the existing plans and their updating.

During 27–29 October 2025, the Agency organized internal workshops for updating the Agency’s Integrity Plan, by analysing risks, preventive measures and organizational responsibilities, with the aim of increasing institutional integrity and setting an example for other institutions.

Likewise, the Guidelines on Monitoring and Reporting the Integrity Plan was updated by including the new chapter “Updating the Integrity Plan”, in accordance with Article 25 of Law No. 08/L-017, and the procedure for its formal amendment was initiated.

On 17 November 2025, all officials responsible for integrity were officially notified of the obligation and procedures for updating the Integrity Plans, with the final deadline set for the end of January 2026, and were provided with materials, guidance and practical examples.

In May 2025, a workshop was also organized for drafting the Methodology for Monitoring the Implementation of the State Strategy and Action Plan against Corruption, with the aim of creating a clear, measurable and sustainable framework for strategic monitoring and evidence-based reporting.

COOPERATION WITH DOMESTIC INSTITUTIONS

Within the reporting period January–December 2025, and in implementation of its mandate and legal obligations, the Agency for Prevention of Corruption has maintained continuous cooperation with relevant domestic institutions in order to implement its field of activity as successfully as possible. This cooperation has included the holding of various meetings, engagement in the review of primary and secondary legislation, as well as the undertaking of other necessary actions to meet the institutional requirements and needs of the Agency. Activities and representation in initiatives for cooperation and coordination of activities with high-level domestic institutions were led by the Director of the Agency, as follows:

- The Director of the Agency for Prevention of Corruption (APC), Mr. Yll Buleshkaj, participated in the presentation of the “Handbook on Prevention of Corruption”, organized by NGO Aktiv in North Mitrovica. /16 January 2025/
- The Agency for Prevention of Corruption (APC) organized meetings with public institutions, publicly-owned enterprises and civil society to discuss the findings and lessons learned from Corruption Risk Mapping (CRM). /27-29 January 2025/
- The Agency for Prevention of Corruption (APC), with the support of the Council of Europe Office in Prishtina, organized a two-day workshop for officials on the proposed framework of the Methodological Guidance on Conflict of Interest. /31 January 2025/
- The Agency for Prevention of Corruption (APC), with the support of the Kosovo Institute for Public Administration (KIPA), held the first workshop of the four-day cycle of trainings for contact officials on the asset and gift declaration process for 2025. /4 February 2025/
- The four-day cycle of trainings for contact officials on asset and gift declaration for 2025, organized by the Agency for Prevention of Corruption with the support of KIPA, was concluded. /7 February 2025/

- Kosovo underwent the voluntary OECD assessment on Public Integrity Indicators, in which 22 OECD member states and 6 non-member states, including Kosovo, participated. The results show that Kosovo ranks above the average of OECD and European Union countries in the first two groups of indicators, with the exception of lobbying regulation. /7 February 2025/
- The Agency for Prevention of Corruption welcomed the improvement of Kosovo's ranking in the 2024 Corruption Perceptions Index. This result demonstrates visible progress and underscores the need to continue these efforts. /11 February 2025/
- The Agency for Prevention of Corruption (APC) organized a meeting with CSOs on the anti-corruption review of legal acts. The discussions included the extension of the review of the laws on the Kosovo Prosecutorial Council and the Kosovo Judicial Council, the publication of opinions and the assessment of the implementation of recommendations. /7 March 2025/
- The Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, received the Ambassador of the Netherlands to Kosovo, Ms. Karin Boven. The meeting focused on cooperation in corruption prevention, transparency and the protection of whistleblowers. /14 March 2025/
- The Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, was a guest on the podcast organized by the Group for Legal and Political Studies (GLPS), where he spoke about the verification of the interests of public officials and the restrictions applicable to them during the discharge of public functions. /26 March 2025/
- Representatives of the Agency for Prevention of Corruption (APC), Lindita Ademi and Afrim Atashi, participated in the roundtable organized by the Group for Legal and Political Studies on corruption cases in 2024. They expressed concern regarding the handling of cases by the courts and the non-recognition of the APC as an injured party. /27 March 2025/
- The Agency for Prevention of Corruption (APC) organized an activity with newly appointed officials of public institutions on the receipt and handling of whistleblowing reports. The purpose was to strengthen the whistleblowing mechanism as an anti-corruption instrument and as a means of promoting integrity. /16 April 2025/
- The Agency for Prevention of Corruption held a lecture-discussion with Journalism students at the University of Prishtina. The Director of the APC, Mr. Yll Buleshkaj, presented the mandate of the Agency and explained the asset declaration process, the control of gifts and the prevention of conflict of interest. /30 April 2025/
- The Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, had a working visit to the Agency for the Administration of Seized or Confiscated Assets, where he was received by the Acting Director, Mr. Alban Sutaj. During the meeting, the importance of transparent and efficient management of assets acquired unlawfully was emphasized. /30 April 2025/
- The Agency for Prevention of Corruption (APC) held a lecture-discussion with students of the Faculty of Law of the University of Prishtina. Deputy Director Mr. Liridon Nika presented the mandate of the Agency, while Afrim Atashi and Esad Ejupi explained the practical aspects of asset declaration, gifts and the prevention of conflict of interest. /15 May 2025/
- The Agency for Prevention of Corruption, with the support of the OSCE, held a three-day workshop in Gjakova for the finalization of the Anti-Corruption Strategy Monitoring Methodology. /19-21 May 2025/

- The Agency for Prevention of Corruption, with the support of the OSCE, organized two advanced two-day trainings on the handling of whistleblowing cases. More than 53 officials from public institutions, publicly-owned enterprises and municipalities participated in the trainings. /26-27 and 28-29 May 2025/
- The Agency for Prevention of Corruption held a discussion with pupils of the “Ahmet Gashi” Gymnasium in Prishtina. During the meeting, transparency, integrity and the role of youth in corruption prevention were discussed. /30 May 2025/
- Officials responsible for whistleblowing cases in public institutions have begun taking concrete steps to raise awareness among colleagues regarding this mechanism. To date, the Agency for Prevention of Corruption (APC) has held more than 15 informative meetings in various institutions, including municipalities, agencies and prosecution offices. The APC remains committed to supporting officials and expanding the professional network across all public institutions. /13 June 2025/
- The Agency for Prevention of Corruption, in cooperation with the OSCE Mission, organized two two-day training cycles on the handling of whistleblowing cases, with more than 45 officials from public institutions and publicly-owned enterprises participating. The participants engaged in analysing the role of whistleblowing, reviewing the legal framework, conducting practical exercises and exchanging inter-institutional experiences. /17-20 June 2025/
- The Agency for Prevention of Corruption, represented by Mr. Liridon Nika, Deputy Director, participated in the post-election workshop organized by the Central Election Commission and the Venice Commission in Prishtina. Mr. Nika emphasized that the APC reviews the audited financial reports of political parties and donations made by public officials, while also analysing cases from the perspective of conflict of interest. /26 June 2025/
- The Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, received the National Coordinator for Combating Corruption and Economic Crime, Prosecutor Kujtim Munishi. The meeting focused on strengthening inter-institutional cooperation for advancing the prevention and fight against corruption and economic crime in Kosovo. /1 July 2025/
- Officials responsible for handling internal whistleblowing reports held 29 informative meetings during the month of June in various public institutions in Kosovo. (The meetings were held in the following institutions: Institute of Forensic Medicine, Secretariat of the Security Council, Ministry for Communities and Returns, Kosovo Pension Savings Trust, Geological Service of Kosovo, Ferizaj Bus Station, Post of Kosovo, Municipality of Rahovec, Municipality of Leposaviq, Air Navigation Services Agency, Kosovo Customs, Municipality of Fushë Kosova, Prishtina Parking, Ministry of Regional Development, LPE Prishtina Bus Station, Basic Court in Prishtina, Assembly of Kosovo, Court of Appeals, Municipality of Podujeva, Kosovo Privatization Agency, Basic Court in Ferizaj, RWC “Uniteti” Mitrovica, Academy of Justice, State Archives Agency, Agency for Gender Equality, University of Applied Sciences Ferizaj, Ombudsperson Institution, Tax Administration of Kosovo). /3 July 2025/
- The Director of the Agency for Prevention of Corruption, Mr. Yll Buleshkaj, held a discussion with representatives of the ORCA organization within the framework of the HEI25 project, on financial transparency in public universities and the improvement of the asset declaration system. The APC will cooperate in publishing the findings and deepening institutional cooperation. /8 July 2025/

- The Agency for Prevention of Corruption, led by Director Yll Buleshkaj, met with the Academy of Justice, represented by Director Enver Fejzullahu, in order to deepen inter-institutional cooperation. /1 August 2025/
- The Agency for Prevention of Corruption (APC) published the six-month report on whistleblowing in Kosovo (January - June 2025). Out of 199 public institutions, 157 have reported, while 42 have not yet done so. During this period, a total of 62 internal whistleblowing cases were recorded. /4 August 2025/
- The Agency for Prevention of Corruption, in cooperation with Democracy Plus and with the support of the Canada Fund for Local Initiatives (CFLI), established the School for Integrity and Prevention of Corruption. The programme aims to empower young people through knowledge and practical skills in the field of integrity and corruption prevention, while providing opportunities for professional practical work at the APC for the most distinguished participants. /11 August 2025/
- The Agency for Prevention of Corruption welcomed the participants of the School organized by KDI – GO4IT, with the participation of representatives of the Embassy of Sweden in Kosovo. The Director of the APC, Yll Buleshkaj, presented the mandate and role of the APC, emphasizing the importance of youth involvement in strengthening integrity and transparency. /12 August 2025/
- The Agency for Prevention of Corruption, with the support of the OSCE Mission in Kosovo, organized a workshop on the role of whistleblowers and their legal protection. Officials from Albanian- and Serbian-majority municipalities, as well as various central public institutions, participated in the activity, while the discussions focused on legal obligations, reporting channels and the strengthening of whistleblowing mechanisms for the prevention of corruption. /15 August 2025/
- The Agency for Prevention of Corruption and the Kosovo Institute for Public Administration (KIPA) signed a Memorandum of Cooperation for the development of an online module on the prevention of conflict of interest. The module aims to strengthen the knowledge and professionalism of public officials through practical content and electronic certification, with the support of the Government of Germany. /20 August 2025/
- The Agency for Prevention of Corruption awarded a certificate of appreciation to Mr. Xheladin Grajqevci, Head of the IT Security Sector at ISA, for his engagement and support in the implementation of the electronic platform “Report Corruption”. Appreciation was also extended to the staff of ISA, highlighting the role of transparency and technological innovation in the fight against corruption. /21 August 2025/
- The Agency for Prevention of Corruption initiated the establishment of the Consultative Forum with Civil Society Organizations, as a platform for dialogue and joint action against corruption. The Forum aims to strengthen the role of civil society and advance integrity, transparency and accountability in Kosovo. /4 September 2025/
- The Agency for Prevention of Corruption initiated cooperation with the MATRA project, implemented by the FOL Movement and Democracy Plus, with the support of the Embassy of the Kingdom of the Netherlands in Kosovo. On this occasion, the Director of the APC, Mr. Yll Buleshkaj, received representatives of the partner organizations to discuss the monitoring of integrity plans and the strengthening of institutional accountability. /9 September 2025/

- The Agency for Prevention of Corruption held a discussion with graduating students of the “Aleksandër Xhuvani” Gymnasium in Podujeva, where its mission, the importance of integrity and the role of youth in corruption prevention were discussed. APC officials encouraged young people to contribute to building a fairer future and stronger institutions. /12 September 2025/
- The Agency for Prevention of Corruption held in Podujeva a three-day workshop on the Summary Report on the Implementation of Integrity Plans 2025 and the amendment of the guide for monitoring and reporting. The activity was supported by the OSCE Mission in Kosovo. /9-11 October 2025/
- The Agency for Prevention of Corruption organized in Prishtina three one-day workshops on updating Integrity Plans, with the support of the OSCE. More than 100 central and local officials participated in practical exercises for identifying risks and improving preventive measures. The Agency’s new methodological approach to drafting and updating integrity plans was also presented during the workshops. /21-23 October 2025/
- The Agency for Prevention of Corruption held a lecture-discussion with secondary school pupils of the “Dr. Shaban Hashani” School in Ferizaj on honesty, transparency and civic responsibility. The pupils discussed and asked questions about the importance of integrity and their role in preventing corruption. /23 October 2025/
- The GLPS RoLPIK 2025 Report assesses the Agency for Prevention of Corruption with the grade 3 and records an 8.7% increase in citizens’ trust in reporting. The APC calls upon citizens to report corruption cases for a corruption-free Kosovo. /23 October 2025/
- The Agency for Prevention of Corruption and the National Audit Office deepened their cooperation on corruption prevention and the strengthening of institutional integrity. Four inter-institutional sessions involved more than 120 officials, addressing conflict of interest and audit practices. This cooperation aims to increase transparency and accountability in public administration. /25 October 2025/
- The Agency for Prevention of Corruption concluded the two-day workshop in Istog on testing the Digital Service Management System (DMSA). The system includes E-Declaration, gift administration, whistleblowing, conflict of interest, integrity plans and corruption risk assessment. This step enhances transparency, efficiency and compliance with European standards. /28 October 2025/
- The first generation of the School for Integrity and Prevention of Corruption has commenced, bringing together young people from across Kosovo to learn and act for a fairer society. The participants deepened their knowledge of the anti-corruption legal framework, asset declaration and the role of the APC, and also discussed media, civil society and transparency practices. The School was organized by Democracy Plus and the APC, with the support of CFLI. /31 October 2025/
- The School for Integrity and Prevention of Corruption concluded with sessions on conflict of interest and whistleblowing as key tools against corruption. Participants deepened their understanding of the practices of identifying and managing conflicts, as well as the role of whistleblowers in protecting the public interest. The School was organized by Democracy Plus and the APC, with the support of CFLI. /1-2 November 2025/
- The Agency for Prevention of Corruption organized in Peja two one-day workshops with more than 30 officials from various institutions for the discussion of concrete cases and best practices

in the management of conflict of interest. The activity, supported by the OSCE in Kosovo, aimed to strengthen integrity and transparency in public administration. /11-13 November 2025/

- The Agency for Prevention of Corruption and the OSCE organized a workshop with 17 public institutions on the protection of whistleblowers and harmonization with EU Directive 2019/1937. Discussions focused on responsibility, immediate protection and legal support for whistleblowers. This activity strengthens transparency and integrity in Kosovo's public administration. /21-22 November 2025/
- The Agency for Prevention of Corruption (APC), in cooperation with Democracy Plus, organized a study visit to the Agency for Information and Privacy (AIP) for the youth of the School for Integrity and Prevention of Corruption. Participants were informed about the mandate, legal basis and practices of the AIP in the protection of personal data and access to public documents, with emphasis placed on the importance of transparency and institutional integrity. /27 November 2025/
- The Agency for Prevention of Corruption (APC) and the Department of Journalism at the University of Prishtina signed a Memorandum of Cooperation to strengthen public integrity and the professional development of students. The three-year partnership envisages trainings, joint activities and the practical engagement of students in APC projects. Director Buleshkaj emphasized that the cooperation brings institutions closer to the academic community and creates sustainable value for the public by increasing integrity, professional communication and opportunities for young people. /3 December 2025/
- The Agency for Prevention of Corruption was in the focus of the PECK III Project, co-financed by the European Union and the Council of Europe. Director Yll Buleshkaj presented on the panel the results, achievements and the state of integrity in the public sector. The project was assessed as an example of reforms with real impact in strengthening institutional integrity. The APC thanked the EU and the Council of Europe for their support and continued partnership. /10 December 2025/
- The Agency for Prevention of Corruption (APC) welcomed the report of the Kosovo Law Institute on the impact of the Supreme Court judgment on cases of non-declaration of assets. Afrim Atashi, Department Director at the APC, emphasized the importance of the correct implementation of the law and the preservation of the integrity of the asset declaration system, thanking the Kosovo Law Institute for its professional contribution. /11 December 2025/
- The Director of the Agency for Prevention of Corruption (APC), Mr. Yll Buleshkaj, together with his associates, was received by the management and staff of the Department of Journalism at the University of Prishtina. The meeting focused on the implementation of the cooperation agreement, and it was agreed that a joint plan of activities for 2026 would be drafted, with the aim of strengthening academic and institutional cooperation. /18 December 2025/
- The Agency for Prevention of Corruption (APC) initiated the anti-corruption self-assessment process, in accordance with OECD standards. The process aims to strengthen institutional integrity and transparency through the identification of high-risk areas for corruption, relying on inter-institutional cooperation and evidence-based decision-making. /19 December 2025/
- The Agency for Prevention of Corruption (APC) opened the call for applications for the second session of the School for Integrity and Prevention of Corruption 2026. The programme is

organized by Democracy Plus in cooperation with the APC and with the support of the Embassy of Canada in Croatia and Kosovo. This School aims to equip students with knowledge, practical tools and critical skills for the promotion of integrity, accountability and good governance. /26 December 2025/

COOPERATION WITH INTERNATIONAL ORGANIZATIONS AND FOREIGN INSTITUTIONS

Throughout the year, the Agency for Prevention of Corruption (APC) worked consistently and proactively towards enhancing international cooperation, which was realized through the representation and active participation of the Director and the Agency's staff in various activities, both inside the country and abroad. These activities included international and regional visits, as well as participation in conferences and events at the regional level. The principal objective of this engagement was the institutional representation of the Agency, as well as the exchange of experiences and best practices in the field of preventing and combating corruption.

- A delegation of the Agency for Prevention of Corruption (APC) visited MENAC in Portugal, where the delegation was received by President Dr. António Pires Henriques da Graça and the institution's staff. The visit was conducted within the framework of the BACPE Project for the exchange of anti-corruption best practices, enabling discussions on the involvement of the private sector, compliance programmes, whistleblowing mechanisms, training for officials and the use of technology for transparency. The lessons learned will strengthen the APC's capacities and its effectiveness in the fight against corruption in Kosovo. /12 February 2025/
- The Agency for Prevention of Corruption (APC) thanked Ambassador Edona Maloku Bërdyna and the staff of the Embassy of Kosovo in Lisbon for their hospitality, while discussing opportunities for Kosovo–Portugal cooperation in the prevention of corruption. /12 February 2025/
- A delegation of the APC, led by Director Mr. Yll Buleshkaj, conducted a study visit to the French Anti-Corruption Agency (AFA) within the framework of the BACPE Project. Practices were exchanged regarding the regulatory framework, whistleblowing and the protection of whistleblowers, as well as e-learning and education, thereby contributing to the strengthening of the APC's capacities in the fight against corruption. /20 February 2025/
- A delegation of the Agency for Prevention of Corruption (APC), led by Director Yll Buleshkaj, conducted a study visit to Rome together with representatives of civil society and the National Audit Office. The visit was organized with the support of the Council of Europe's PECK III Project, co-financed by the CoE and the EU. During the first day, the delegation visited the National School of Administration (SNA), where the role of education and cooperation with ANAC in the prevention of corruption was discussed.
- During the study visit in Rome, the Agency for Prevention of Corruption visited the Court of Auditors and met with institutional leaders and advisers. The discussions focused on the role of the Court in the prevention of corruption, cooperation with ANAC, administrative and criminal liability, the recovery of public funds and anti-corruption communication. The meeting enabled the exchange of experience and lessons drawn from successful practices. /26 February 2025/
- The delegation of the Agency for Prevention of Corruption, led by Director Yll Buleshkaj, held meetings at the Italian National Anti-Corruption Authority (ANAC) in Rome, with the support of the Council of Europe's PECK III Project. The discussions focused on transparency, the

measurement of corruption, the protection of whistleblowers, public procurement, anti-corruption technologies, conflict of interest and the National Anti-Corruption Plan. This cooperation aims at the exchange of experience and the strengthening of institutional mechanisms in Kosovo. /27 February 2025/

- The Agency for Prevention of Corruption represented Kosovo in Strasbourg at a Council of Europe workshop. The APC presented its experience in mapping corruption risks across 159 public institutions. Director Yll Buleshkaj emphasized that corruption is both a legal and a cultural challenge requiring institutional will, while the technical team presented the practical implementation thereof. Kosovo's participation was assessed as an example of regional and European success. /25 April 2025/
- The Agency for Prevention of Corruption welcomed representatives from South Korea, Mongolia, Uzbekistan, UNDP and the Western Balkans. The visit was conducted within the framework of the forum "South-South and Triangular Cooperation for Advancing Corruption Prevention". The discussions focused on innovative approaches and successful anti-corruption models through thematic sessions and practical exchanges. The forum strengthened international cooperation and promoted public integrity and transparency. /2 June 2025/
- The Agency for Prevention of Corruption became the newest partner of the NEIWA network during its 10th Assembly in Brussels. Director Yll Buleshkaj presented the APC's application and underscored the importance of integrity and whistleblower protection in Kosovo. NEIWA provides a platform for the exchange of knowledge and experiences in the field of integrity and whistleblowing, in line with EU Directive 2019/1937. This membership strengthens the APC's international standing and anti-corruption mechanisms. /12 June 2025/
- The Agency for Prevention of Corruption, represented by Director Mr. Yll Buleshkaj and Mr. Blerim Kelmendi, participated in the Plenary Meeting of the OECD Anti-Corruption Network (ACN) in Paris. The meeting brought together more than 150 representatives from state institutions, international organizations and civil society to discuss anti-corruption challenges and best practices. The APC used this forum for the exchange of experience, regional dialogue and the strengthening of international cooperation, thereby reaffirming its commitment to the implementation of recommendations. /7-9 July 2025/
- The Agency for Prevention of Corruption, in cooperation with TAIEX, organized a two-day training on EU standards for asset declaration, gifts and the protection of whistleblowers. The training was delivered by international experts and aimed at advancing knowledge of European best practices. Director Yll Buleshkaj emphasized the importance of strengthening the professional capacities of the staff. The APC extends its gratitude to the European Union for its continued support. /4-5 December 2025/

REGIONAL COOPERATION

- The Agency for Prevention of Corruption of Kosovo hosted a delegation from the State Commission for Prevention of Corruption of North Macedonia. The meeting focused on discussing the Memorandum of Cooperation, with the aim of strengthening inter-institutional coordination against corruption. The parties agreed to draft an action plan for the exchange of experiences and joint activities. /31 January 2025/

- The Agency for Prevention of Corruption participated in the meeting of Regional Community of Practice on Political Integrity, held in Skopje. The Agency was represented by Agron Behrami, Head of the Asset Verification Division. The meeting was organized with the support of KDI - Transparency International Kosovo, within the framework of the EU-funded “Integrity Watch” project. /27 February 2025/
- The Director of the APC, Yll Buleshkaj, participated in the international conference in Ljubljana on strengthening the integrity and independence of criminal justice in the Western Balkans. The meeting discussed key challenges, including political will, gender equality and the efficiency of justice institutions. The recommendations will serve as a roadmap for reforms in line with international standards and European integration. /10-11 March 2025/
- The APC participated in the regional conference on whistleblower protection, organized by the Kosovo Law Institute (KLI), CSDG and the Southeast Europe Coalition. Director Yll Buleshkaj emphasized the importance of whistleblowing in the fight against corruption and the need for stronger legal and institutional protection. The APC reaffirmed its commitment to integrity and transparency, drawing on best practices and EU directives. /10–11 April 2025/
- The APC organized a regional workshop in Prishtina within the framework of the PECK III Project, with the support of the EU and the Council of Europe. More than 80 officials from Kosovo and the region took part in the activity, where asset declaration and control, gifts and the prevention of conflict of interest were addressed. Practical experiences were exchanged and the use of technology in asset verification was discussed, thereby strengthening regional cooperation and institutional integrity. /22-23 May 2025/
- The APC participated in the Regional Workshop on Integrity in the Public Sector in Budva, organized by ReSPA, with representatives from the Western Balkans and France. Mr. Milot Shala presented the state of integrity in Kosovo’s public sector and emphasized the importance of whistleblowing as an instrument for transparency and the protection of whistleblowers. He also presented the APC’s web and mobile application for whistleblowing and contributed to the exchange of regional experiences for improving institutional integrity. /25-26 June 2025/
- The APC was represented by Ms. Bleona Krasniqi and Ms. Edita Rukolli at the Regional Summer School for Young Anti-Corruption Practitioners in Podgorica, Montenegro. The 20th programme, supported by UNODC and the Austrian Development Agency, aims to strengthen capacities for the implementation of UNCAC and UNTOC through the exchange of practices and professional networking. /8 July 2025/
- The APC delegation, led by Director Yll Buleshkaj, held a meeting in Tirana with the Director General of the Anti-Corruption Directorate in Albania, Insidor Rexhepi. The discussion focused on inter-institutional cooperation, the exchange of experiences and good practices in the prevention of corruption. The meeting was welcomed by adviser Silvana Ramadani, who stressed the importance of institutional and political coordination. /16 September 2025/
- The Agency for Prevention of Corruption of Kosovo conducted a working visit to the Agency for Prevention of Corruption of Montenegro for the exchange of best practices and the development of mechanisms for transparency and integrity. Director Yll Buleshkaj emphasized the importance of regional cooperation for advancing institutional experience, while the Council of Europe

methodology for corruption risk assessment and the digital platform for anonymous reporting and whistleblower protection were presented. /26 September 2025/

- The Director of the APC, Mr. Yll Buleshkaj, represented the Agency at the High-Level Summit on Good Governance and Anti-Corruption in the Western Balkans in Sarajevo. The Summit brought together institutions, civil society and international partners to strengthen the fight against corruption and advance European integration in the region. /6 October 2025/
- The APC participated in the regional conference “Preventing Corruption” in Petrovac, Montenegro, where experiences and practices were exchanged regarding corruption prevention, the strengthening of integrity and the digitalization of services. The participation of counterpart institutions from the region attested to the shared commitment to transparency and institutional integrity. The event was organized by the APC of Montenegro with the support of UNODC and regional partners. /28-29 October 2025/
- The Director of the APC, Yll Buleshkaj, participated in the Regional Forum on Integrity and Institutional Reforms in Skopje, where he emphasized the role of AI and digital tools in the fight against corruption. He presented the APC’s commitments to modernizing asset declaration, corruption reporting and strengthening transparency. The Forum brought together experts from the region and Europe, demonstrating a shared commitment to good governance and public integrity. /10 December 2025/
- The Agency for Prevention of Corruption of Kosovo and the State Commission for Prevention of Corruption of North Macedonia signed a Memorandum of Cooperation. The agreement formalizes the exchange of best practices in the prevention and investigation of corruption, the control of assets and gifts, and the protection of whistleblowers. The Memorandum aims to strengthen institutional integrity, enhance transparency and promote good governance in accordance with European standards. /23 December 2025/

Kosovo strengthens its position in prevention of corruption at the European level

The institutional reforms of the Republic of Kosovo in the field of corruption prevention were also internationally recognized during a high-level workshop organized by the Council of Europe in Strasbourg. The Agency for Prevention of Corruption (APC) presented its approach and experience in corruption risk mapping, emphasizing the importance of these reforms for strengthening integrity and transparency in public institutions.

An international delegation of 25 members, with representatives from South Korea, Mongolia, Uzbekistan, as well as from the United Nations Development Programme - UNDP, together with participants from Kosovo, Albania, North Macedonia, Montenegro and Bosnia and Herzegovina, as part of the South-South and Triangular Cooperation Workshop on Advancing Corruption Prevention (#SSTC), visited the Agency for Prevention of Corruption (APC) to learn more about anti-corruption initiatives in the Republic of Kosovo and the development of the innovative corruption reporting platform.







MEDIA ACTIVITIES

In order to implement its mandate in a transparent manner and with full accountability, the Agency intensified concrete actions through cooperation with all relevant stakeholders in the field of corruption prevention in Kosovo. During the reporting period January-December 2025, APC also carried out a considerable number of media and public awareness activities.

The Agency's media activities during 2025 were focused on communication with the media, including participation in and organization of conferences, interviews and statements for the media, as well as participation in various television shows and podcasts. An important part of this communication was also cooperation with the media in the initiation and handling of cases related to the prevention of conflict of interest, administrative investigation procedures and suspicions of inaccurate asset declaration. In parallel, the Agency ensured continuous public information through the proactive publication of information on the APC's official website and on social media.

In 2025, the Agency organized and participated in:

- Participation of the Director of the Agency for Prevention of Corruption (APC), Mr. Yll Buleshkaj, in the conference for the presentation of the “Handbook on Prevention of Corruption”.
- Participation of the Director of the Agency for Prevention of Corruption (APC), Mr. Yll Buleshkaj, in the conference on Integrity in Justice.
- Implementation of the information campaign on the mandate of the APC, broadcast for four weeks on the public television broadcaster and several times on social media.
- Within the framework of public information, accountability and responses to journalists’ requests during 2025, a total of 50 interviews or statements/declarations and participation in television programmes and podcasts by the Director of the Agency were carried out.
- From 165 responses provided to the media in 2022 and 145 responses in 2023, the Agency provided around 140 responses in 2024, whereas for the reporting period January-December 2025, the Agency for Prevention of Corruption (APC) provided responses to approximately 120 questions raised by various media outlets.
- During the year, the Agency for Prevention of Corruption enjoyed sustained and satisfactory media coverage, with greater intensity during certain periods. In the months of March and April alone, more than 50 media items concerning and citing the APC were published in each of those months. The most extensive coverage was recorded in December during Integrity Week. This period was characterized by daily coverage on television and numerous publications in online media, resulting in dozens and hundreds of articles concerning the APC.

PUBLIC AWARENESS ACTIVITIES

With the aim of informing officials regarding compliance with the obligations prescribed by law and raising awareness among the wider public, the Agency prepared four (4) awareness-raising video spots (produced in Albanian and Serbian), on: the APC Mandate / Call for Asset Declaration / Reporting Conflict of Interest / Call for Reporting-Whistleblowing of Corruption Cases and Institutional Cooperation.

These video spots intended to:

- Present the APC’s mandate and role in preventing corruption.
- Encourage public awareness and the active involvement of citizens in reporting and preventing corruption.

The awareness-raising video spots are published and displayed on the Agency’s official website, have also been published several times on social media, and were broadcast for several weeks on Radio Television of Kosovo (RTK).

REQUESTS FOR ACCESS TO PUBLIC INFORMATION

During the reporting period, the Agency received 17 requests for access to public documents, which were handled in accordance with Law No. 06/L-081 on Access to Public Documents.

Out of a total of 17 requests, full access to information was granted in 12 requests, partial access to information was granted in 2 requests, whereas in 3 requests access to information was denied based on the legal provisions of the applicable legislation.

Handling of requests for access to public documents January-December 2025
17 requests received
12 full access to information,
2 partial access to information
3 rejected

The profile of entities requesting access to public documents was as follows: 6 requests were received from the media, 3 requests were received from Non-Governmental Organizations, 4 requests from private persons, and 4 requests were received from others. The nature of the requests for access was as follows:

1. Administrative documents - 16
2. Documents related to the employment relationship - 1

INTEGRITY WEEK 2025

The Agency for Prevention of Corruption (APC) successfully organized the “Integrity Week 2025”, an initiative dedicated to strengthening transparency, accountability and the building of institutions with integrity. This week of activities, held from 8 to 12 December 2025, brought together approximately 300 participants from public institutions, the private sector, civil society and the media, thereby contributing to the debate on good practices on the fight against corruption.

During the five days of activities, roundtables were held on various topics, including institutional integrity, the challenges of public procurement, transparency of public officials regarding gifts, prevention of conflict of interest and the role of whistleblowing.

Integrity Week 2025 became a successful platform for debate and cooperation aimed at strengthening transparency and integrity in institutions. The activities held reflected the commitment of the APC and its partners to preventing corruption and promoting good governance.

With broad participation and fruitful discussions, this organization strengthened the foundations for advancing integrity policies in the Republic of Kosovo.

Each day of this week was widely covered by visual and print media, reflecting the interest in and importance of the topics addressed.

Day One: Contribution of Integrity Plans to the Prevention of Corruption

The Agency for Prevention of Corruption (APC), in cooperation with the APC Consultative Forum with Civil Society, opened the activities of Integrity Week 2025 on 8 December with the first thematic panel, focused on the importance and impact of integrity plans in the public institutions of the Republic of Kosovo.

At the opening of the event, the Director of the APC, Mr. Yll Buleshkaj, spoke about the importance of strengthening proactive mechanisms for preventing corruption and enhancing the culture of institutional responsibility.

He underlined that Integrity Week has now become an important annual platform aimed at raising public awareness and deepening inter-institutional cooperation in the fight against corruption, within the framework of marking the International Anti-Corruption Day - 9 December.

“In Kosovo, the integrity of officials and institutions is no longer optional - it is a legal obligation and a professional standard,” Director Buleshkaj emphasized at the opening of Integrity Week 2025.



Day Two: Prevention of Corruption in Public Procurement

Integrity Week 2025 continued its work on 9 December with a focus on the prevention of corruption in public procurement, one of the sectors most sensitive to the risk of corruption.

The event was held within the framework of the International Anti-Corruption Day and aimed to strengthen the mechanisms of transparency, accountability and integrity in procurement processes.

The Director of the APC, Yll Buleshkaj, emphasized that integrity in this field is “the foundation of the credibility of the citizens of Kosovo”.

The panel included representatives of oversight institutions, civil society organizations and experts in the field.

The discussions addressed key challenges, risk indicators and best practices for improving the public procurement process.



Day Three: Gifts in the Discharge of Official Function

Within the framework of Integrity Week, on 10 December a thematic session was held dedicated to the management of gifts in the discharge of official function, a sensitive and important area for institutional integrity and the prevention of undue influence on public decision-making.

In his welcoming remarks, the Deputy Director of the APC, Mr. Liridon Nika, emphasized the importance of the proper handling of gifts in official function, considering this process a pillar of institutional integrity.

“A gesture of courtesy. A cultural symbol. But the moment it enters the public sphere, the gift is no longer a gesture - it becomes a test of our integrity and the trust of citizens.”

Participants discussed best practices for the control and management of gifts as a pillar of institutional integrity and good governance.



Day Four: Prevention of Conflict of Interest in Higher Education

On the fourth day of Integrity Week, the APC organized a session on the prevention of conflict of interest in higher education.

The Director of the Agency, Mr. Yll Buleshkaj, emphasized the importance of academic integrity as a pillar of university quality and public trust.

The discussions focused on improving institutional practices and strengthening credibility in higher education. The session underlined that meritocracy and transparency are the foundation of a strong and fair education system.



Day Five: Whistleblowing in the Public and Private Sector

The fifth day of the Integrity Week 2025, organized by the Agency for Prevention of Corruption (APC) in cooperation with the APC Consultative Forum with Civil Society, focused on one of the key mechanisms for strengthening transparency and protecting the public interest: whistleblowing in the public and private sector.

At the opening of the thematic session, the Director of the APC, Mr. Yll Buleshkaj, emphasized that whistleblowers are an indispensable link in safeguarding institutional integrity.

“The integrity of public officials is not an option - it is a shared responsibility, and whistleblowers are our strongest allies on this journey. Whistleblowing, whether in the public or private sector, is an essential mechanism for protecting the public interest and for moving closer to European standards,” he stated.

Whistleblowers were regarded as an indispensable link in safeguarding institutional integrity and as powerful allies in the prevention of corruption.



THE TRUST OF CITIZENS IN THE AGENCY IS INCREASING

The Agency's commitment to discharging its mandate in an independent, professional manner and exclusively on the basis of legal provisions, while remaining open and accountable in informing the public and institutions about its work and scope of activity, has yielded further successes.

The latest measurement data, conducted in December 2025, indicate clear progress in the growth of citizens' trust in the Agency for Prevention of Corruption.

A total of 61% of citizens are either very or somewhat informed about the work of the APC (+5% compared to June), while 62% express satisfaction with its performance (+9% compared to June).

Alongside the increase in trust, citizens articulate higher expectations with regard to the verification of asset declarations, the handling of whistleblowing reports, the publication of data and public awareness-raising.

This reflection of public expectations will continue to guide the Agency's work, always in accordance with European standards.

EDUCATIONAL ACTIVITIES - ESTABLISHMENT OF THE SCHOOL AND NUMEROUS MEETINGS ACROSS KOSOVO

Recognizing education as a means, or long-term investment, for the prevention of corruption, the Agency for Prevention of Corruption (APC) has carried out a series of activities with the younger generations, namely with secondary school pupils and university students.

As a result of cooperation with Non-Governmental Organizations, supported also by international partners, and in accordance with the Cooperation Agreement between the Agency and the Non-Governmental Organization Democracy Plus, during 2025 the Director of the APC took a further step in civic education, with particular emphasis on the younger generations - students.

- The Agency for Prevention of Corruption, in cooperation with Democracy Plus and with the support of the Canada Fund for Local Initiatives (CFLI), established the School for Integrity and Prevention of Corruption. The programme aims to empower young people through knowledge and practical skills in the field of integrity and prevention of corruption, while providing opportunities for professional practical work in the APC for the most distinguished participants. /11 August 2025/.

Within this educational activity, namely the first session of the School for Integrity and Prevention of Corruption, 79 students from across Kosovo applied, while 25 students met the criteria and passed the tests to attend the lectures. Of those who attended the School, the 4 most distinguished students were engaged for three months in an internship at the Agency, receiving monthly remuneration from the donors.

During 2025, the Agency also carried out other awareness-raising activities with secondary school pupils and university students in the capital city and other towns of Kosovo:

- The Agency for Prevention of Corruption held a lecture-discussion with Journalism students at the University of Prishtina. The Director of the APC, Mr. Yll Buleshkaj, presented the mandate of the Agency and explained the asset declaration process, the control of gifts and the prevention of conflict of interest. /30 April 2025/
- The Agency for Prevention of Corruption (APC) held a lecture-discussion with students of the Faculty of Law of the University of Prishtina. Deputy Director Mr. Liridon Nika presented the mandate of the Agency, while Afrim Atashi and Esad Ejupi explained the practical aspects of asset declaration, gifts and the prevention of conflict of interest. /15 May 2025/
- The Agency for Prevention of Corruption held a discussion with pupils of the “Ahmet Gashi” Gymnasium in Prishtina. During the meeting, transparency, integrity and the role of youth in the prevention of corruption were discussed. /30 May 2025/
- The Agency for Prevention of Corruption welcomed the participants of the School organized by KDI – GO4IT, with the participation of representatives of the Embassy of Sweden in Kosovo. The

Director of the APC, Yll Buleshkaj, presented the mandate and role of the APC, emphasizing the importance of youth involvement in strengthening integrity and transparency. /12 August 2025/

- The Agency for Prevention of Corruption held a discussion with graduating students of the “Aleksandër Xhuvani” Gymnasium in Podujeva, where its mission, the importance of integrity and the role of youth in corruption prevention were discussed. APC officials encouraged young people to contribute to building a fairer future and stronger institutions. /12 September 2025/
- The Agency for Prevention of Corruption held a lecture-discussion with pupils of the “Dr. Shaban Hashani” School in Ferizaj, on which occasion representatives of the Agency engaged with the youth on the importance of integrity and their role in the prevention of corruption. The pupils actively participated through questions and discussions, emphasizing that education on integrity begins with raising the awareness of the younger generation. /23 October 2025/
- The Agency for Prevention of Corruption (APC), in cooperation with Democracy Plus, organized for the young participants of the School for Integrity and Prevention of Corruption a study visit to the Information and Privacy Agency (IPA). Participants were informed about the mandate, legal basis and practices of the AIP in the protection of personal data and access to public documents, with emphasis placed on the importance of transparency and institutional integrity. /27 November 2025/

HANDLING OF EXTERNAL WHISTLEBLOWING CASES

Under Article 18 of Law No. 06/L-085 on Protection of Whistleblowers, the right of whistleblowers to make an external whistleblowing after having performed an internal whistleblowing, or to whistleblow externally directly, is emphasized. The procedure for external whistleblowing in the public sector is initiated by reporting information to the Agency for Prevention of Corruption.

During 2025, the Agency received and recorded a total of 92 external whistleblowing cases.

From 20 cases received in 2023, the number increased to 48 cases in 2024, while during 2025 it reached 92 cases, indicating that the number of finalized cases in 2025 increased by approximately 91.7% compared to 2024. This increase may be interpreted as a positive sign for the culture of whistleblowing and the trust that citizens have in reporting suspicious or unlawful activities, relying on the protection offered by the Law on Protection of Whistleblowers.

This increase in the number of cases also indicates that there has been greater engagement by the Agency for Prevention of Corruption in raising the awareness of public officials regarding the whistleblowing mechanism, which, as a result, has simultaneously led to increased confidence in the Agency.

This trend may also have several important implications for the fight against corruption and for transparency in public institutions. It is also an important indicator of increased awareness regarding the opportunities and protection afforded to whistleblowers, as well as of the strengthening of trust in the legal mechanisms that support this practice.

Cases referred to the Minor Offense Court: 4 cases were referred to the Court because whistleblower reports were not received and handled in accordance with legal obligations, as well as because measures were taken against whistleblowers, contrary to the Law on Protection of Whistleblowers.

Cases referred to the State Prosecution Office: 3 cases were referred as information due to reasonable suspicion that elements of criminal offences existed and, at the same time, in order to assess whether sufficient evidence exists or whether additional evidence should be secured so that further legal proceedings may continue.

Cases referred to the Kosovo Police, Department for Investigation of Economic Crimes and Corruption: 7 cases were referred to the Kosovo Police in order to assess whether any potential criminal investigation should be initiated or whether additional evidence should be secured in order to proceed further.

Cases referred to Public Institutions: 31 cases were sent to other public institutions deemed competent by the Agency, from which it was requested that they assess the allegations presented and undertake measures in relation thereto. These institutions are:

- Tax Administration of Kosovo: (2 cases),
- Emergency Management Agency: (1 case)
- Kosovo Academy for Public Safety: (3 cases),
- Civil Aviation Authority of Kosovo: (1 case)
- Police Inspectorate of Kosovo: (2 cases),
- Central Labour Inspectorate: (1 case)
- Municipality of South Mitrovica: (1 case),
- Municipality of Obiliq: (2 cases),
- Municipality of Prishtina: (3 cases),
- Kosovo Energy Corporation - KEK: (1 case),
- Assembly of the Republic of Kosovo: (1 case),
- Ministry of Education, Science, Technology and Innovation: (1 case),
- Ministry of Finance, Labour and Transfers: (1 case),
- Ministry of Industry, Entrepreneurship and Trade: (1 case),
- Ministry of Culture, Youth and Sports: (1 case),
- Ministry of Internal Affairs: (3 cases),
- Ministry of Foreign Affairs and Diaspora: (1 case),
- Ministry of Health: (1 case),
- Family Medicine Centre in Ferizaj: (1 case),
- Kosovo Hospital and University Clinical Service: (2 cases),
- University of Prishtina: (1 case),

Closed and rejected cases: 17 cases from the total number of cases during this year were CLOSED, because, after conducting the administrative investigation procedure and the review of evidence, the allegations made by the whistleblowers were not substantiated.

The closed cases generally involved incomplete allegations, which were not supported by any convincing and reasonable evidence.

HANDLING OF INTERNAL WHISTLEBLOWING CASES

A public employer with more than fifteen (15) employees, and a private employer with more than fifty (50) employees, is obliged to appoint a Responsible Officer.

Out of 210 public institutions for which the Agency has data confirming that they appointed a Responsible Officer, 189 institutions submitted their report to the Agency, the overwhelming majority of them within the deadline prescribed by law, while a small number submitted them during the month of February of this year.

Whereas 20 public institutions did not submit this report to the Agency's address. At the request of the Agency, the Responsible Officers organized awareness-raising activities within their institutions and, as a result, during 2025, 65 public institutions provided evidence to us of the organization of such activities.

The Agency is expected to organize activities within public institutions together with Responsible Officers, will organize activities for newly appointed officials, as well as for the private sector, all with the aim of raising awareness regarding the whistleblowing mechanism. During 2025, three institutions stood out with the highest number of whistleblowing reports, namely: the Kosovo Hospital and University Clinical Service, the Kosovo Energy Corporation and the Kosovo Correctional Service.

Whereas the total number of reports within the framework of internal whistleblowing for 2025 amounted to 130 cases.

As regards private entities, during this year the Agency undertook concrete actions, initially by securing data from the Tax Administration of Kosovo for private entities with more than 50 employees, from which it subsequently requested reporting to the Agency and, at the same time, the appointment of their Responsible Officer.

From the responses received from private entities, 349 private entities responded positively in reporting for 2025, having reported regarding whistleblowing cases for 2025. The appointment of Responsible Officers for receiving and handling whistleblowing cases within private entities marks an appropriate step towards the implementation of the whistleblowing mechanism in general.

Whereas only 3 private entities reported that they had received cases of this nature: IPKO Telecommunication LLC (2 cases), TEB Bank (1 case) and Sutherland Global Services (1 case)

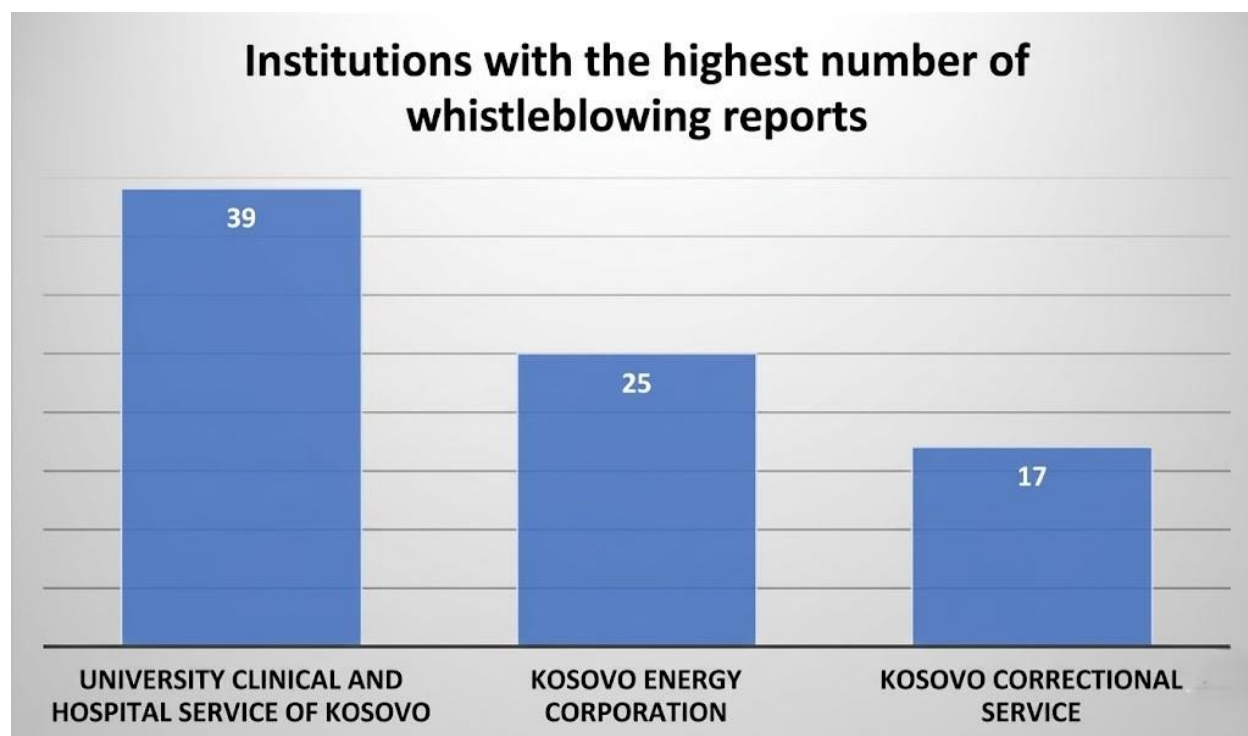


Figure 6. Graphical presentation of the institutions with the highest number of whistleblowing reports during 2025

ACTIVITIES/TRAININGS WITH RESPONSIBLE OFFICERS

The Agency for Prevention of Corruption is committed to investing in the enhancement of the professional capacities of Responsible Officers in the field of whistleblowing, through organizing trainings and informative activities. These activities are intended to equip officials with the necessary knowledge for the proper implementation of whistleblower protection mechanisms within public institutions.

Trainings constitute a key element of the Agency's efforts to strengthen the practical and professional capacities of officials who handle whistleblowing cases, ensuring action in accordance with Law No. 06/L-085 on Protection of Whistleblowers and with international standards and best practices. Within these trainings, the following topics were addressed:

- **Familiarization with the Law and Whistleblowing Procedures:** Training of officials regarding the legal framework and procedures to be applied during the receipt and handling of whistleblowing reports, as well as the standards for managing cases involving whistleblowers.
- **Handling of Whistleblowing Cases:** Strengthening professional capacities for the assessment, analysis and review of whistleblowing cases, while ensuring a fair, transparent and protective process for whistleblowers.

- **The Importance of Transparency and Accountability:** Raising awareness and training officials on the role of transparency and accountability in public administration, as well as on the impact of whistleblowing in preventing corruption and increasing the quality of public services.
- **Management of Confidential Information:** Educating officials on the use of practices and technological tools for safeguarding and protecting reported information, while ensuring data security and the confidentiality of the identity of whistleblowers.
- **Protection of Whistleblowers:** Training of officials regarding protective mechanisms and measures for whistleblowers, with the aim of preventing retaliation, discrimination or possible sanctions following the submission of a whistleblowing report.

During 2025, the Agency held a total of 16 activities, all dedicated to the Responsible Officers of public institutions. Of these activities, 4 were **advanced trainings**, organized with the aim of deepening professional knowledge, strengthening institutional capacities and advancing the practical skills of Responsible Officers in the field of prevention of corruption and the implementation of the relevant legislation. In several of these trainings, the Agency was supported by the OSCE Mission in Kosovo, and they were held on the following dates:

- 08 April 2025: (Venue: APC offices),
- 16 April 2025: (Venue: APC offices),
- 24 April 2025: (Venue: APC offices),
- 26-27 May 2025: (Venue: Hotel Dukagjini - Peja),
- 28-29 May 2025: (Venue: Hotel Dukagjini - Peja),
- 17-18 June 2025: (Venue: Hotel Dukagjini - Peja),
- 19-20 June 2025: (Venue: Hotel Dukagjini - Peja),
- 14-15 August 2025: (Venue: Hotel Astoria - Gjilan),
- 21-22 November 2025: (Venue: Premium Park Hotel - Prizren),
- 12 December 2025: (Venue: Hotel Sirius).

Through these trainings, the Agency aims to strengthen the culture of safe and reliable whistleblowing, thereby contributing to the prevention of corruption and the advancement of transparency, accountability and institutional responsibility. At the same time, these activities serve to increase the awareness of public officials regarding the importance of their role in protecting whistleblowers and in building public trust in public institutions.

Few photos from the activities



LESSONS LEARNED AND FUTURE PRIORITIES

The management of the Agency continued also in 2025 to focus its engagement on strengthening institutional transparency and accountability, while ensuring impartiality and equal treatment in the exercise of its mandate and legal competences. This commitment has directly influenced the growth of public trust in the Agency. The considerable number of reports received concerning inaccurate declaration of assets, potential conflict of interest or other violations affecting the public interest – submitted by citizens, interest groups, institutions and senior state officials – demonstrates the growth of civic awareness and the readiness to contribute to the fight against corruption.

Raising the awareness of public officials in the field of prevention of conflict of interest was among the main priorities during 2025. The increase in the number of requests for the handling of conflict of interest situations indicates growing trust in the work of the Agency. However, the hesitation of certain

Responsible Authorities to address these cases reflects the need for greater institutional engagement in the implementation and monitoring of the relevant procedures. Notwithstanding the awareness-raising campaigns and continuous trainings, the Agency aims to further elevate the standards of responsibility and accountability of public officials, so that they themselves identify, address and avoid conflict of interest situations during the decision-making process, without the need for direct intervention by the Agency.

The process of systematization and internal reorganization, in accordance with the mandate and legal competences, has enabled a more efficient distribution of human resources and better management of duties and responsibilities. During 2025, the filling of the positions foreseen under the organizational structure was completed, which directly contributed to the strengthening of professional capacities and institutional performance. The consolidation of the personnel structure contributed to increased efficiency and to a more comprehensive fulfilment of the Agency's legal obligations.

The implementation and upgrade of the electronic system for asset declaration and online submission have contributed to increasing the transparency, accuracy and efficiency of the monitoring and verification process. The digital transformation of the Agency during 2025 constituted an important step towards institutional modernization, improving data management and facilitating citizens' access to electronic services, including the reporting of cases. Going forward, a continuing priority remains the integration of the Agency's systems with the platforms of other state institutions, as an effective means for collecting and analysing data from multiple sources, with the aim of identifying possible violations more quickly and accurately.

The Agency has continuously acted to increase transparency and accountability, while remaining open and responsible in informing the public and institutions about its activities and results. Cooperation with state institutions, civil society organizations and the media has strengthened trust and has demonstrated its commitment to open communication. The regular publication of activities, the launch of audiovisual materials for the use of the "Report Corruption" platform, participation in the media, conferences and interviews, as well as the continuous updating of the official website, have contributed to raising public awareness and informing the public.

Going forward, a priority remains the organization of awareness-raising activities for citizens concerning corruption and its impact on society, through educational campaigns, social media, participation in programmes and other forms of public communication. Improving communication with the media and the public is considered essential for increasing transparency and strengthening trust in the results of the Agency's work.

The drafting and continuous updating of bylaws in accordance with legal standards constituted an important process during 2025. The adopted acts have helped establish a sustainable basis for the effective implementation of legislation. Going forward, a priority remains the harmonization of secondary

legislation with primary legislation, by adapting it to institutional needs and ensuring the more efficient functioning of work processes.

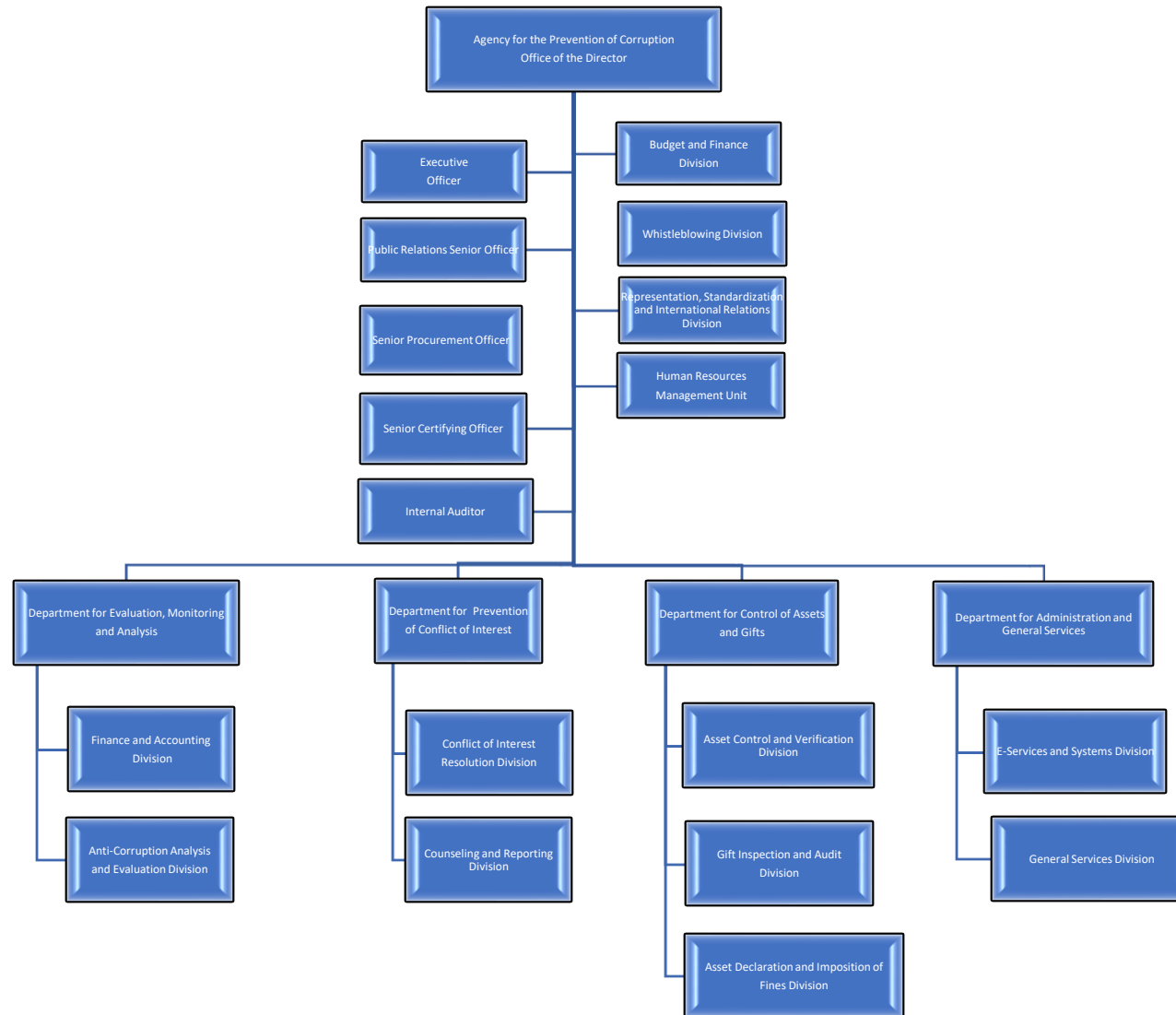
The increase in the number of whistleblowing cases during 2025 demonstrates enhanced trust in the relevant mechanisms. The training of Responsible Officers within institutions has contributed to improving performance and strengthening responsibility in the handling of and protection of whistleblowers. A continuing priority remains the creation of a safe and protective environment for whistleblowers, considering their protection as an important preventive mechanism against corruption and as a key factor in strengthening institutional integrity.

The Agency aims, through strengthening professional expertise and expanding capacities, assessing corruption risk in sensitive sectors, addressing legal gaps and monitoring integrity plans, to contribute in a sustainable manner to the prevention of corruption in Kosovo.

The needs identified during the implementation of the Annual Performance Plan for 2025 were supported by various partners through concrete projects. The strengthening of this cooperation will continue in the future. During 2025, the Agency developed successful cooperation with international partners, by participating in activities within and outside the country and by exchanging best practices in the field of preventing and combating corruption. Representation in regional and global initiatives will remain a strategic priority.

A priority of particular importance remains the engagement of all responsible institutions for the empowerment of the competent authorities in the prevention of conflict of interest, contact officials for the declaration of assets and gifts, as well as Responsible Officers for the protection of whistleblowers. Creating adequate working conditions for these officials, as key points of contact and coordination with the Agency, is essential for the effective implementation of legal obligations in the field of corruption prevention.

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



ANNEX NO. 2. LIST OF PARTICIPATION IN TRAININGS, FORUMS, SEMINARS DURING 2025

No.	Type of training	Organization	Place	Date	No. of participants
1.	Presentation and discussion on the Methodological Guidance on Conflict of Interest	APC	Istog	29-31.01.2025	14
2.	Spending Officers	Treasury of Kosovo	Prishtina	06.02./2025	1
3.	Study visit, domestic anti-corruption mechanisms	EPAC	Lisbon	11-13.02.2025	3
4.	Official visit to the French ACC	EPAC	Paris	19-21.02.2025	3
5.	Participation in the regional meeting of the Community of Practice on Political Integrity in the Western Balkans and Turkey	Kosovo Democratic Institute	Skopje	27-28.02.2025	1
6.	Study visit	PECK III	Roma	25.02.2025-1.03.2025	11
7.	Commitments Module	Treasury of Kosovo	Prishtina	05-10.03.2025	1
8.	Expenditure Module / Certifying Officer	Treasury of Kosovo	Prishtina	13-17.03.2025	1
9.	Microsoft Visio & Microsoft Publisher	KIPA	Prishtina	27-28.03.2025	2
10.	Protection of Personal Data	KIPA	Prishtina	27-28.03.2025	1
11.	Increasing Public Oversight and Institutional Accountability in Kosovo	GLPS	Prishtina	20.03.2025	1
12.	Transfer, suspension and termination of employment relationship in the Civil Service	KIPA	Prishtina	25-26.09.2025	1
13.	Participation in the Working Group on Public Integrity and Anti-Corruption	OECD	Paris	25-28.03.2025	2
14.	European Whistleblowing Conference	European Whistleblowing Institute	Brussels	03-04.04.2025	1
15.	Advancement of the Asset Declaration System	APC	Prishtina	22.04.2025	17
16.	Budget execution and Treasury procedures	Treasury of Kosovo	Prishtina	22-23.04.2025	3

17.	Workshop on drafting the Methodology on Monitoring the State Strategy and Action Plan against Corruption	APC / OSCE	Gjakova	19-21.05.2025	12
18.	Whistleblowing Mechanism - Advanced Training	APC / OSCE	Peja	19-20.06.2025	7
19.	Prevention and Reduction of Administrative Burden	EU	Prishtina	28-30.05.2025	4
20.	Introduction to the UNCAC and UNTOC review mechanisms	RAI	Podgorica	01-04.07.2025	2
21.	Support for Kosovo's EU integration reform processes mandated by the German Federal Ministry for Economic Cooperation and Development	KIPA	Prishtina	07-08.07.2025	1
22.	Participation in the 24th Monitoring Meeting of the Anti-Corruption Action Plan	OECD	Paris	07-10.07.2025	2
23.	Training on asset registration in KFMIS	Treasury of Kosovo	Prishtina	08-11.07.2025	1
24.	Amendment and Supplementation of Law No. 08/L-197 on Public Officials	MIA	Prishtina	23.07.2025	1
25.	Prevention of Corruption through Whistleblowing and Integrity in the Public Sector	APC / OSCE	Gjilan	14-15.08.2025	2
26.	Meeting between the APC and ANAC	OSCE	Roma	14-16.09.2025	3
27.	Advanced Professional Programme for Public Procurement	KIPA	Prishtina	23.09.2025	1
28.	Transfer, suspension and termination of employment relationship in the Civil Service	KIPA	Prishtina	25-26.09.2025	1
30.	Official visit to the Agency for Prevention of Corruption in Montenegro	Kosovo Agency of Statistics	Podgorica	26.09.2025	8
31.	Confiscation of Illegal Assets without Conviction	EU	Prishtina	30.09.2025-1.10.2025	4
32.	Anti-Corruption and Good Governance in the Western Balkans	RAI	Sarajevo	05-07.10.2025	1
33.	Stabilisation and Association Agreement (SAA)	KIPA	Prishtina	15-16.10 2025	1
34.	Gender issues and the challenges of building gender equality	KIPA	Prishtina	20 -21.10 2025	1
35.	Introduction to legislation – General theory of legal acts	KIPA	Prishtina	22-23.10.2025	1
36.	Performance management system and oversight of agencies	KIPA	Prishtina	03-04.11.2025	2

37.	Summary Report on the Implementation of Integrity Plans (January-June), as well as the Amendment of the Guidelines on Monitoring and Reporting of Integrity Plans	APC / OSCE	Podujeva	09-11.10.2025	14
38.	Training for Trainers	KIPA	Prishtina	18.11.2025	1
39.	Participant in the roundtable: Regional Community of Practice on Integrity in the Public Sector	AFA / RESPA	Belgrade	21-23.10.2025	2
40.	Professional Conference and the 24th Annual General Assembly of EPAC/EACN	EPAC / EACN	The Hague	23-26.11.2025	2
41.	Workshop on finalizing the APC Performance Plan for 2026	APC	Tirana	04-06.11.2025	20
42.	The importance of preventing conflict of interest at source	OSCE	Peja	11-13.11.2025	4
43.	Whistleblower Protection in Practice	OSCE	Prizren	21-22.11.2025	2
45.	APC Strategic Plan for 2026-2028	OSCE	Peja	01-03.12.2025	16
46.	Development of Control Mechanisms and Digitalization of Processes in the Public Financial Management System	Treasury of Kosovo	Prishtina	04.12.2025	1
47.	Workshop organized with the support of SIGMA for strengthening the strategic role of the HRMU	DMPO	Prishtina	18.12.2025	1