

## Republic of Serbia

### Legal Framework

The legal framework in the Republic of Serbia is aligned with the ratified international documents in the field of anti-corruption, primarily with the **United Nations Convention Against Corruption**<sup>1</sup>, **Criminal Law Convention on Corruption**<sup>2</sup> and **Additional Protocol to the Criminal Law Convention on Corruption**<sup>3</sup>.

**The Criminal Code**<sup>4</sup> defines criminal acts with the aim to curb the corruption which are classified, primarily, in the group of criminal acts against official duty: abuse of office (Article 359), influence peddling (Article 366), soliciting and accepting bribes (Article 367) and bribery (Article 368). Also, most criminal acts against the economy are important for curbing corruption. The Criminal Code incriminate performing all forms of influence peddling by a person holding the status of an official, also, as a perpetrator of accepting bribes can be a foreign official, i.e. when the bribe is given, promised or offered to a foreign official (Article 367, paragraph 5 and Article 368, paragraph 3). In terms of curbing corruption in the private sector, the Law amending the 2016 Criminal Code, introduces new incriminations within the criminal acts against economy which refer to the corruption in the private sector.

In addition to the Criminal Code, the criminal acts against the economy and other offenses with the element of corruption are incriminated by other laws: **Law on the Anti-Corruption Agency**<sup>5</sup>, **Company Law**<sup>6</sup>, **Law on the Capital Market**<sup>7</sup>, **Law on the Tax Procedure and Tax Administration**<sup>8</sup>, **Law on Privatisation**<sup>9</sup>, **Law on Foreign Exchange Operations**<sup>10</sup>, **Law on Banks**<sup>11</sup>, **Law on Financing Political Activities**<sup>12</sup>.

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<sup>1</sup>“Official Gazette of Serbia and Montenegro - International treaties”number 12/05

<sup>2</sup>“Official Gazette of Serbia and Montenegro - International treaties”number 2/2002 and“Official Gazette of Serbia and Montenegro -International treaties”, number 18/2005

<sup>3</sup>Official Gazette of RS – International treaties, number 102/2007

<sup>4</sup>“Official Gazette of RS”no 85/2005, 88/2005- correction, 107/2005 - correction 72/2009, 111/2009, 121/2012, 104/2013, 108/2014, 94/2016, 35/2019

<sup>5</sup>“Official Gazette of RS”no 97/2008, 53/2010, 66/2011 – CC decision, 67/2013 – CC decision, 112/2013 – authentic interpretation and 8/2015 – CC decision

<sup>6</sup>“Official Gazette of RS”no 36/2011, 99/2011, 83/2014- other law, 5/2015, 44/2018 and 95/2018

<sup>7</sup>“Official Gazette of RS”no 31/2011, 112/2015 and 108/2016

<sup>8</sup>“Official Gazette of RS”no 80/2002, 84/2002 - correction, 23/2003 - correction, 70/2003, 55/2004, 61/2005, 85/2005 – other law, 62/2006 – other law, 63/2006 – correction of other law, 61/2007, 20/2009, 72/2009 – other law, 53/2010, 101/2011, 2/2012 - correction, 93/2012, 47/2013, 108/2013, 68/2014, 105/2014, 91/2015 – authentic interpretation, 112/2015, 15/2016, 108/2016, 30/2018 and 95/2018

<sup>9</sup>“Official Gazette of RS”no 83/2014, 46/2015, 112/2015 and 20/2016 – authentic interpretation

<sup>10</sup>“Official Gazette of RS”no 62/2006, 31/2011, 119/2012, 139/2014 and 30/2018

<sup>11</sup>“Official Gazette of RS”no 107/2005, 91/2010 and 14/2015

Adoption of the **Law on Liability of Legal Persons for Criminal Offenses**<sup>13</sup> introduced the liability of legal persons for criminal offenses.

For the fight against the corruption, of special importance is the **Law on the Organisation and Jurisdiction of Government Authorities in Suppression of Organised Crime, Terrorism, and Corruption**<sup>14</sup> which became effective on 1 March 2018, and which, *inter alia*, defines that all persons performing activities and tasks within the jurisdiction of government authorities in suppression of corruptive criminal offenses are obliged to keep as a secret the data and finding they obtain in performing those tasks and activities, in line with the regulations governing the secrecy of data and personal data protection.

The last amendments to the **Law on Civil Servants**<sup>15</sup>, which are a part of the reform process of the civil servant system based on merits, are focused on the strengthening and promoting the professionalism of civil servants and on the establishment of civil servant system based on the principles of transparency, competitiveness, and depoliticization. The amendment to the law which refer to the prevention of the conflict of interest have the aim to contribute to a better organisation of this field in the civil servant system, better prevention of corruption and management of the conflict of interest, harmonisation of legal solutions with the international standards in the field of prevention of the conflict of interest, and the realisation of objectives, measures and activities defined by strategic documents in the field of anti-corruption. It regulates in detail the prohibition of receiving gifts by government officials and with them related persons in terms that they must not receive a thing, present, service or any other benefit, which can affect the impartial and professional performance of office and which may be considered a reward related to the performance of that office. Also, it introduces the obligation of government officials to inform the government body about the present received. In the light of transparency related to the activities for preventing the conflict of interest the obligation is introduced for government authorities to publish reports on the management of the conflict of interest in the government authority containing the statistical data from the records on conflict of interest kept by the government authority.

**The Law on Public Service Employees**<sup>16</sup> defines the equal status and salaries of the public service employees (education, science, culture, health and social protection). The provisions of this law regulate the prevention of the conflict of interest and define measures for the prevention of the conflict of interest. It defines the prohibition of receiving presents in relation to the performance of activities, except from the protocol presents of small value and the prohibition of

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<sup>12</sup>“Official Gazette of RS”no 43/2011 and 123/2014

<sup>13</sup>“Official Gazette of RS”number 97/2008

<sup>14</sup>“Official Gazette of RS”no 94/2016 and 87/2018-other law

<sup>15</sup>“Official Gazette of RS”no 79/2005, 81/2005 - correction, 83/2005 - correction, 64/2007, 67/2007 - correction, 116/2008, 104/2009, 99/2014, 94/2017 and 95/2018

<sup>16</sup>“Official Gazette of RS”no 113/17 and 95/18

the use of public service office for affecting the realisation of rights. The implementation of this law was postponed for 1 January 2020.

**Law on Employees in Autonomous Provinces and Local Self-Government Units**<sup>17</sup> defines the comprehensive manner of the system of labour relations in autonomous provinces and local self-government units, with the aim to establish the basic principles of civil servant system, based on the standards accepted in the modern comparatively legal systems, which fulfils the basic presumption for the full professionalisation and depoliticization of the staff in autonomous provinces and local self-government units. As conflict of interest may occur in various circumstances and forms, those law provisions regulate: the prohibition of receiving presents, additional work, prohibition of establishment of economic entities and companies, restriction of memberships in the bodies of economic entities and companies, and the reporting of conflict of interest related to a decision of the body.

**Law on Public Agencies**<sup>18</sup> introduces the mandatory inspection of professional competences, knowledge and skills of candidate in the election process which introduces the merit system in the employment system of public agencies. The provisions of that law define the regulations related to the prevention of the conflict of interest of civil servants apply to the prevention of the conflict of interest of the employees.

The latest amendments to the **Law on Enforcement and Security**<sup>19</sup> defines the anti-corruption measure which is directly related to the realisation of the right to property. The executive creditor who, by submitting several execution proposals against the same executive debtor, requested a separate settlement of several claims which could have been settled in the same executive procedure, has the right to a compensation only for those costs which he/she would have had if he/she had submitted only one execution proposal for the settlement of those claims. The provisions apply accordingly also when the execution creditor submitted several execution proposals against the same execution debtor requesting the full or partial settlement of the principal of one claim, interest or procedure costs.

The new **Law on Educational Inspection**<sup>20</sup> is the first special law in the field of inspection, adopted after the adoption of the general Law on Inspection Oversight, which specifically regulates the specificities of the inspection in the field of education. In line with the recommendation of the Anti-Corruption Agency, the new legal solution defines that inspection oversight over the institutions' operations, as an entrusted task, will not be performed by municipal or city administration anymore as defined by the provision of the valid Law on the Fundamentals of the Education System<sup>21</sup>.

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<sup>17</sup>“Official Gazette of RS”no21/16, 113/17, 113/17–other law and 95/18)

<sup>18</sup>“Official Gazette of RS”no 18/2005, 81/2005 – correction and 47/2018

<sup>19</sup>“Official Gazette of RS”no 106/2015, 106/2016 – authentic interpretation, 113/2017 – authentic interpretation and 54/2019

<sup>20</sup>“Official Gazette of RS”number 27/2018

<sup>21</sup> “Official Gazette of RS”, no 72/2009, 52/2011, 55/2013, 35/2015 –authentic interpretation, 68/2015 and 62/2016 – CC decision

Significant changes have been made in the systemic laws in the field of construction, transportation and infrastructure, with the aim, apart from other things, to reduce the possibilities of corruption. Amendments to the **Law on Planning and Construction**<sup>22</sup> introduces the electronic system for issuance of construction permits, which brought to an important reform change of the system for issuance of construction acts. The key effects of the establishment of the software for the issuance of electronic construction are that all the procedures related to the issuance of construction permits are performed in one place, and the possibilities of corruption are minimised. The adoption of the **Law on the Registration Procedure with the Cadastre of Real Estate and Utilities**<sup>23</sup> and the introduction of e-counters, the important reform of the cadastre was carried out. The basic goal achieved by this law is the increased legal security of real estate owners, real estate acquirers and third persons who rely on the data registered in the cadastre, and in this way the possibility of corruption is minimised, since direct communication with employees in the services of the cadastre of real estate is not able, while fast services reduce the motivation and reasons for corruption.

The **Law on Healthcare**<sup>24</sup> received the provisions which refer to the conflict of interest and corruption (Articles 234 and 235). Those provisions define that the competences of the ethical board of healthcare institutions are, *inter alia*, to provide advice and guidelines regarding the prevention of the conflict of interest and corruption, identification and reduction of risks of the conflict of interest and corruption, training and raising the awareness of the employees about the prevention of the conflict of interest and corruption, giving opinion in the cases of suspicion of the conflict of interest and corruption and taking measures necessary for the protection of persons who provided information on cases of the conflict of interest and corruption. Also, those provisions define that the suspicion of corruption shall be reported not only to the ethical board but also to the prosecutor's office and the ministry responsible for interior.

In the course of the creation of the **Law on Health Insurance**<sup>25</sup> attention was paid to the negative impact of the corruption on the adopted solution. As the creation of bylaws in the field of health insurance is ongoing, the potential negative impact on the proposed solutions is considered, especially in the bylaw act regulating the manner and conditions for the realisation of the right to mandatory health insurance and participation, and the bylaw on the waiting list improving the criteria for establishing the waiting list, and the transparency and the creation of the single base i.e. waiting list.

## **Strategic Framework**

**Action Plan for Chapter 23** (sub-chapter Fight against corruption) within the envisaged activities, integrated certain human rights in the anti-corruption policy. In the widest possible

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<sup>22</sup>“Official Gazette of RS”no 72/2009, 81/2009 - correction, 64/2010 – CC decision, 24/2011, 121/2012, 42/2013 – CC decision, 50/2013 – CC decision, 98/2013 – CC decision, 132/2014, 145/2014, 83/2018, 31/2019 and 37/2019 – other law

<sup>23</sup>“Official Gazette of RS”no 41/2018, 95/2018 and 31/2019

<sup>24</sup>“Official Gazette of RS”, number 25/2019

<sup>25</sup>“Official Gazette of RS”number 25/2019

sense, the Action Plan for Chapter 23 aims at strengthening the rule of law, which is based on the inalienable human rights and makes the basic presumption of Serbian Constitution.

Within the activity which envisages the adoption of the Law on the Prevention of Corruption<sup>26</sup> with the aim of protection of the public interest, reduction of the risk of corruption and strengthening the integrity and liability of public authorities and public officials, the text of the law also integrated the right to access to information of public importance, personal data protection, right to information, right to participation in public activity management, right to property.

Action Plan for Chapter 23 (sub-chapter Fight against corruption), defines the adoption of amendments to the Criminal Code in the part of criminal offenses against economy, with the aim to harmonise with certain standards in the process of accession of the Republic of Serbia to the European Union. Fulfilling these activities at the same time empowers the right to freedom and safety, right to fair trial, legal safety in criminal law, right to equal protection of the rights and the right to legal means.

Regarding the implementation of the activities in the field of education defined by the Action Plan for the Negotiation Chapter 23 (sub-chapter Fight against corruption), Minister of Education, Science, and Technological Development made the Decision to adopt the Action Plan for the Fight against Corruption in Education in line with the recommendations in the OECD Report “Strengthening the Integrity and Anti-Corruption in Education” from 2012 and the Action Plan for the implementation of the Education Development Strategy in Serbia by 2020. The Action Plan contains 13 measures and actions, and some of them are: employment in the institutions before university and higher education, enrolment in the institutions of higher education, assessment in university education, improvement of inspection oversight, accreditation of institutions and programmes. The realisation period of that Action Plan is 2017-2020<sup>27</sup>.

The National Anti-Corruption Strategy in the Republic of Serbia for the period 2013-2018, and the accompanying Action Plan define the adoption and implementation of the efficient legal framework regulating lobbying and the participation of the public in the procedure of adoption of regulations. The Law on Lobbying<sup>28</sup> establishes a comprehensive framework for the legal regulation of lobbying which ensures transparency of lobbying activities.

One of the goals of the Sport Development Strategy in the Republic of Serbia in the period 2014-2018 (and the Strategy being created) is restricting the space for the use of so called discretion rights which are often the source of corruption, by considering the way in which the budget money is spent and establishing a clear and transparent procedure for monitoring the money flows in sport and respecting all the positive laws and bylaws. The obligation of each local self-government unit is defined to determine the programme for sport development on its territory, to

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<sup>26</sup>“Official Gazette of RS” number 35/2019.

<sup>27</sup>Action Plan for Fight against Corruption in Education based on the OECD recommendations from 2012 is available at the web site of the Ministry of Education, Science, and Technological Development -

<http://www.mpn.gov.rs/javnost-rada/>

<sup>28</sup>“Official Gazette of RS” number 87/2018

be in line with that strategy, and that in the allocation of funds it will take care of the criteria defined on the national level and that the entire process will be public and transparent.

The National Youth Strategy for the period 2015-2025 in the field of “Youth Safety” plans the activity to improve the existing and develop new programmes and activities covering the risks of various forms of crime and corruption.

Since 2012, the Republic of Serbia has been a participant in the Open Government Partnership, an international initiative through which it implements numerous measures aimed at improving the transparency, public responsibility and participation of the public in decision making, as well as strengthening of public integrity and fight against corruption. The adoption of the **Law on Electronic Government**<sup>29</sup> and the bylaws created based on that law, established the legal framework for opening and reuse of data while in October 2017, the Open Data Portal was launched where over 200 data sets have been published by 40 institutions.

### **Corruption Prevention Mechanisms**

Human rights are directly or indirectly involved in the corruption prevention mechanisms, implemented by the Anti-Corruption Agency, including local anti-corruption plans, integrity plans and petitions of legal and natural persons.

Local anti-corruption plan is a preventive anti-corruption mechanism for the introduction of the principle of good governance and good government in the work of bodies and services of local self-government units and other public authorities, meeting the needs and interest of the local population and local community on the local level.

The Integrity Plan is a document, which is a result of the self-assessment of the level of exposure of institutions to the risks of occurrence and development of corruption, and the exposure to ethically and professionally unacceptable actions. The goal of adoption of the integrity plan is strengthening the integrity of institutions, which involves individual honesty, professionalism, ethics, institutional unity, and the manner of acting in line with moral values. Strengthening the integrity of institutions reduces the risk for public authorisations to be used contrary to the purpose for which they were established, which contributes to the improvement of the quality of the work of the institutions, and therefore the increase of the public trust in their work.

Local anti-corruption plans and integrity plans should reduce the space for the occurrence of corruption and thus prevent the occurrence of the damage which can be manifested in the form of violation of human rights of individuals who may become victims of the corruption.

The Anti-Corruption Agency acts within its competences in line with the petitions of the citizens, in which the petitioners point out the corruptive acts in the manner of work or actions taken by public authorities or officials and civil servants on a position, which are not necessarily related to the petitioner or due to which the petitioners believe that some of their rights or legal interests are violated.

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<sup>29</sup>“Official Gazette of RS” number 27/2018

As the Anti-Corruption Agency has no inspection or investigation authorisations, but the prevention role in the society, the goal of actions based on the petitions is to identify the cases of corruption in cooperation with citizen and pointing out to the public authorities the actions which make room for corruption in the public sector.

The Anti-Corruption Agency has received more than 6.500 petitions of natural and legal persons so far, which are mostly in the field of education, judiciary, health and labour and social policy. Based on those petitions, the Agency has launched relevant procedures to identify the violations of the law and to prosecute the responsible persons.

For the prevention of corruption of great importance is the implementation of the Law on Protection of Whistle-blowers<sup>30</sup>. Starting from its implementation in 2015, until the end of 2018, 568 cases were resolved before the court of the total 637 cases which confirms the efficiency of the protection of whistle-blowers in court procedures. The protection of whistle-blowers also refers to those who are related to whistle-blowers, suffering harmful consequences and this is why the full legal protection is provided to those who report the suspicion of corruption or cases of abuse of public interest. The Supreme Court of Cassation provides the support to the activities which refer to the protection of whistle-blowers and in that regard realises the cooperation with the civil society organisations.

Police activities related to the corruptive criminal offenses are performed by the Ministry of Interior (MoI). The MoI tended to have the new Law on Police<sup>31</sup> in order to create a clear legal framework for the action of police officers and to clearly underline the role and competences of the Sector of Internal Control as an organisation unit under the MoI competent for the control of legality of the work of police officers and other employees in the MoI and as a holder of all activities for curbing corruption among the employees in the MoI. The Sector of Internal Control has introduced three new preventive institutes implementing related services in the European Union – carrying out the corruption risk analysis, carrying out integrity test and record keeping on property status and inspection of changes in property status (officials of MoI and highly risky jobs established by the corruption risk analysis). It is defined that the Sector of Internal Control performs the security checks for the managers of medium level – second level of security check, and also for the persons on the position and appointed persons, i.e. managers of higher and strategic level in the MoI – third level of security check. Based on the authorisations for the adoption of bylaws which refer to the activities within the purview of the Sector of Internal Control, all the necessary bylaws have been adopted as follows:

- Rulebook on the manner of carrying out the integrity test and the Rulebook on the manner of performing internal control<sup>32</sup>;
- Rulebook on the manner of controlling reports and changes of property status in MoI<sup>33</sup>;
- Instructions on the Methodology for carrying out corruption risk analysis in MoI<sup>34</sup>.

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<sup>30</sup>“Official Gazette of RS” number 128/14

<sup>31</sup>“Official Gazette of RS“, no 6/2016, 24/2018 and 87/2018

<sup>32</sup>“Official Gazette of RS” number 39/2018

<sup>33</sup>“Official Gazette of RS“ number 49/2018

The increase in the number of employees in the Sector of Internal Control, their training and improvement of technical capacities, was performed with the aim to implement the new competences of the Sector in order to realise the activities within the Action Plan for Chapter 23 (Judiciary and fundamental rights) and Action Plan for Chapter 24 (Justice, freedom, and security), National Programme for the adoption of EU acquis, and Action Plan for the implementation of the National Anti-Corruption Strategy.

Corruption prevention and protection in the field of education is realised by reviewing the valid contracts and requirements for concluding contracts on leasing a part of the space of school institutions. Since 2012, all the lease contracts for the part of space of educational institutions have been concluded in line with the Law on Public Property<sup>35</sup>, Regulation on the requirements for buying and selling real estate by direct negotiations, leasing of objects in public property and procedures of public bidding and collection of written bids<sup>36</sup> and the Decision of the Minister of Education, Science, and Technological Development from 3 December 2012 which defines the requirements under which school institutions may lease real estate in public ownership, the purpose of the use of the funds realised from the lease, and the deadline of leasing the real estate and the Instructions of the Minister of Education, Science, and Technological Development from 3 December 2012 for the conduct of educational institutions and institutions of pupils' and students' standards in leasing real estate in public property. Those regulations establish the procedures under which all contracts undergo a double control of the National Directorate for Property and the Ministry of Education, Science, and Technological Development. The activity is continuous and there is a reduction of the number of cases requiring inspection oversight.

The oversight over the implementation of the Law on Patient's Rights<sup>37</sup> and the oversight over the realisation of the rights of patients are prevention measures as the most efficient way of fighting against corruption since a full and timely information significantly influences the resolution of the needs of customers who, due to their health status, are in a vulnerable solution.

In 2018, the health inspection was sent 2141 petitions which referred to the rights of patients, of which 1973 petitions referred to five out of 19 rights of patients, as follows: right to quality of health service provision, right to access to healthcare, right to respect of patient's time, right to information and right to other professional opinion, and 422 petitions were found by the inspection as reasonable.

### **Organisation of state authorities for suppressing corruption, cooperation, and coordination**

Law on Organisation and Jurisdiction of Government Authorities in Suppression Organised Crime, Terrorism and Corruption defines the establishment of Special Departments for Suppression of Corruption in four higher public prosecutor's offices – in Belgrade, Novi Sad, Niš and Kraljevo.

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<sup>34</sup> "Official Gazette of RS" number 94/2018

<sup>35</sup> "Official Gazette of RS" no 72/11, 83/13 and 105/14

<sup>36</sup> "Official Gazette of RS" no 24/2012, 48/2015, 99/2015, 42/2017 and 94/2017.

<sup>37</sup> "Official Gazette of RS" number 45/2013



The coordination of work of special departments of public prosecutor's offices for suppression of corruption is performed by the prosecutor for organised crime who, with the aim to coordinate the work, convenes meetings for the managers of special departments at least once a month.

The prosecutor for organised crime appointed a deputy prosecutor who is responsible under the annual work programme for the coordination of work of special departments for suppression of corruption. Regular monthly meetings are held with the managers of Special Departments for Suppression of Corruption in public prosecutor's offices.

Also, the Law defines the possibility of establishing the service of financial forensics in the Prosecutor's Office for Organised Crime and special departments of higher public prosecutor's offices. Three financial forensic officers have been employed so far, one in the Prosecutor's Office for Organised Crime and one in each special department for suppression of corruption established in the public prosecutor's offices in Belgrade and Novi Sad. The hired forensic officers underwent relevant trainings in the field of finances, accounting, audit, banking, stock market, and economic operations, for which they received the relevant certificates.

Starting of March 2018, a cooperation has been established among the special departments for suppression of corruption with the organisational units for fighting against corruption under the police organisation. The cooperation is carried out in line with the law, jurisdictions, authorisations and responsibilities of government authorities.

Pursuant to the Law, liaison officers were appointed in the government authorities, institutions, and funds for the purpose of improving the coordination and cooperation with special departments for suppression of corruption and the Prosecutor's Office for Organised Crime.

Force Groups can be established in the Prosecutor's Office for Organised Crime and special departments in higher public prosecutor's offices for suppression of corruption, with the aim to identify and prosecute criminal offenses subject to the work of the force group.

A force group is established by the decision of the Prosecutor for Organised Crime, i.e. the decision of the higher public prosecutor, upon obtaining the consent from the National Public Prosecutor.

A force group includes the members who are employees in government and other authorities depending on the work scope defined by the decision on the establishment of the force group, only with their consent and the consent of the manager of the authority appointing the employees.

The National Public Prosecutor has given the consent to the Special Departments of higher public prosecutor's offices for suppression of corruption, to establish six force groups, which work resulted in the submission of a large number of criminal charges for corruptive criminal offences and prosecution of a large number of persons.

In April 2017, the National Council of Prosecutors established the institute of commissioners for independence which undertakes activities aimed at strengthening the independence and

institutional integrity of public prosecutor's office and protection and strengthening of independence and professional integrity of the holders of public prosecutor functions.

All public prosecutor's offices created the Integrity Plan in line with the Guidelines for the creation and implementation of the integrity plan and the draft (model) integrity plan, created by the Anti-Corruption Agency. Every public prosecutor's office has appointed a person responsible for monitoring the implementation of the adopted integrity plan.

Special departments for acting in the cases of corruptive criminal offenses were established in the Higher Courts in Belgrade, Kraljevo, Niš and Novi Sad.

In April 2019, the Ministry of Justice, supported by the USAID/GAI Government Accountability Project, established the Working Group for monitoring the preparation, creation and testing of the Electronic Registry of corruptive cases with the task to monitor the activities on the creation of the Registry of corruptive acts and give proposals and guidelines for the creation of the Registry, and to monitor their practical implementation in the pilot and final phase.

On 1 March 2018, the Anti-Corruption Department was established under the MoI in the Directorate of Criminal Police in line with the Law on Organisations and Jurisdictions of Government Authorities in Suppression of Organised Crime, Terrorism and Corruption, as an independent unit specialised for suppression of corruption which has an exclusive jurisdiction in the Republic of Serbia for researching and proving 27 criminal offenses in the field of criminal offenses against official duty and against economy.

In line with the Business-Technical Cooperation Agreement with the Anti-Corruption Agency, the MoI has been exchanging the information with the Agency since 30 December 2015, with the aim to perform the activities from their purview. Based on the Agreement on the use of applicable software of the Agency – Registry of Assets and Profit for keeping records on the property card and the manner of data exchange between the MoI and the Agency, concluded in July 2018, the Agency transferred to the MoI the free use of applicable software for keeping records on the property card and for performing control of registration and changes of property status of the managers in the MoI, as well as the employees at high-risk work positions in the MoI. That agreement also establishes mutual provision of record data kept by the MoI and the Agency, with the aim to perform the activities within their purview. In 2019, the cooperation agreement was signed with the Administration for Prevention of Money Laundering, and the annex to the exiting contract with the Republic Geodetic Authority, and there are ongoing activities on signing the agreement with the Tax Administration and the Business Registers Agency.

On the operational level, the coordination mechanism between the Anti-Corruption Department in the MoI and special departments of Higher Public Prosecutor's Offices (HPPO) is based on the territorial jurisdiction, and in line with that the sections of the Anti-Corruption Departments are distributed in the following manner: HPPO Belgrade – section for Belgrade and Šabac, HPPO Novi Sad – section for Novi Sad and Subotica, HPPO Kraljevo – section Kraljevo, Jagodina, and Užice, HPPO Niš – section for Niš and Zaječar.

MoI signed four protocols/memoranda on cooperation based on which it realises international operational police cooperation, as follows:

- In May 2011, with the Sector for Internal Control and Professional Standards of the MoI of Macedonia;
- In June 2012, with the National Protection Service of Hungary;
- In October 2012 with the General Directorate for Fight against Corruption in the Ministry of Administration and Interior of Romania;
- In October 2013 with the Administration for Internal Control and the Administration of the MoI Inspectorate of the Republic of Bulgaria.

In the previous period MoI initiated signing of the memoranda/protocols on cooperation with the aim to suppress corruption on the mutual border with related services from the Republic of Greece and Republic of Slovenia, and activities have been started for signing of the mentioned protocols.

### **Creation of safe and encouraging environment**

National Public Prosecutor's Office and MoI concluded the Agreement on Cooperation in April 2016, which defines that the National Public Prosecutor's Office and MoI use their internal acts to establish the obligation of emergency action in the cases of criminal offenses which caused the damage to a person performing activities of public importance in the field of information in relation to the activities performed by that person. Also, it defines the appointment of persons for contact and coordination of actions in the cases from that field. For the purpose of more efficient exchange of data and action monitoring, the National Public Prosecutor's Office and MoI will record separately the criminal offenses committed against journalists.

On 22 December 2015, the National Public Prosecutor issued instructions defining record keeping in the appellate, higher and basic public prosecutor's offices regarding the criminal offense committed against persons performing the activities of public importance in the field of information, regarding the activities they perform and online attacks against web pages of the media outlets. Moreover, it was defined that emergency action must be taken in the mentioned cases.

Representatives of MoI, National Public Prosecutor's Office, Journalists' Association of Serbia, Journalists' Association of Vojvodina, Association of Independent Electronic Media, and Association of Online Media signed the Agreement on Cooperation and Measures for Raising the Level of Journalists' Safety on 26 December 2016. The Independent Journalists' Association of Vojvodina joined the Agreement on 18 January 2017. The Agreement has the aim to establish the system of measures for ensuring more efficient criminal law protection of journalists.

A Permanent Working Group has been established which members are authorised representatives of the agreement parties of high level and the cooperation mechanism has been established between the signatories by appointment of contact points for permanent communication between the mentioned government authorities and journalists' associations and media associations in cases of committing criminal offenses against journalists.

The Permanent Working Group has regular meetings to discuss actions of competent authorities in the cases where damaged parties are journalists, and the measures to improve actions and communication of contact persons. The National Public Prosecutor's Office quarterly provides

the members of the permanent working group with the bulletin “Information on actions of public prosecutor’s offices regarding criminal offenses committed against journalists”.

Regarding the protection of the position of lawyers the deputy National Public Prosecutor is a member of the Working Group for monitoring the cases of attacks against lawyers and the work on the relevant normative framework with the aim to improve the criminal law protection of lawyers established on 13 August 2018. In the meeting of the working groups there were discussions about the actions of competent authorities in the cases where damaged parties were lawyers. Furthermore, the National Public Prosecutor issued General Mandatory Instruction on 6 September 2018, ordering emergency actions of public prosecutor’s offices in all the cases for criminal offenses committed against lawyers, in relation to the work they perform.

Having recognised the importance of the creation of a safe and encouraging environment for the civil society, in March 2018, the Government made the Regulation on the funds for encouraging programmes or missing parts of the funds for financing the programmes of public interest realised by the associations<sup>38</sup>. That improves the normative framework with the aim to contribute to the prevention and fight against corruption in the field of financing the civil sector from the budget funds, i.e. to ensure transparency of the process of allocation of funds for encouraging programmes or missing parts of the funds for financing programmes of public interest realised by associations. The regulation specifically defines the measures which refer to the prevention of the conflict of interest in using the allocated funds with associations in order to take all the necessary measures to avoid the conflict of interest. It defines that the beneficiary of the funds (association) before concluding contracts shall provide the competent authority with the statement of non-existence of the conflict of interest and internal act on anti-corruption policy, and that the association in spending the approved budget funds for the realisation of the programme, shall inform the competent authority, immediately upon learning about it, the situation which are or may bring to the conflict of interest.

### **Round tables, education, projects on anti-corruption**

Regarding the consideration of the issues of importance for the fight against corruption, the judges of the Supreme Court of Cassation, appellate and higher courts participated in the Round table on trials in the cases of economic crime and corruption in March 2019. The work of Special Anti-Corruption Departments in higher courts in the Republic of Serbia was presented on that occasion and issues were discussed regarding the implementation of the Law on Organisation and Jurisdiction of Government Authorities in Suppression of Organised Crime, Terrorism, and Corruption. In particular, the discussed focused on presentation and assessment of evidence, determination of unlawful property gain as a consequence of criminal acts in entities of economic operations, and the issue of seizure of property in the cases with the elements of corruption.

In the previous period, in cooperation with the OSCE Mission to Serbia and the Ministry of Justice of the USA, and the National Public Prosecutor’s Office and the Higher Belgrade Court, the “Manual for Suppression of Economic Crime and Corruption” was published and distributed,

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<sup>38</sup>“Official Gazette of RS” number 16/2018

which involves the case law analysis of the Supreme Court of Cassation regarding the criminal offenses with the elements of corruption.

At the last year's Counselling of judges, a special segment was devoted to the corruptive criminal offenses. The topics of the report referred to the new possibilities of proving corruptive criminal offenses and practice of Special Anti-Corruption Departments of the Higher Belgrade Court, and the implementation of the Law on Organisation and Jurisdiction of Government Authorities in Suppression of Organised Crime, Terrorism, and Corruption.

At the following counselling of judges in October this year, the round tables will be devoted to the issues of anti-corruption. Discussions will be focused on the amendments to the Criminal Code in the context of economic crime and actions taken by courts regarding those amendments, abuse of office and ethical standards and disciplinary accountability of judges, and the Practicum for investigations and trials for corruption will be presented.

Within the 2013 IPA project "Prevention and Anti-Corruption", which realisation started in the second half of 2017, there are specialised trainings carried out in the field of fight against corruption. The specialised trainings are carried out also in the organisation of the OSCE Mission to Serbia and the Office of the Legal Advisor of the USA Embassy in Belgrade.

These trainings are intended for judges, public prosecutors, police officers, but also government authorities and agencies appointing liaison officers – representatives of the Anti-Corruption Agency, Tax Administration, Administration for Prevention of Money Laundering, Customs Administration, Public Procurement Administration, Business Registers Agency, State Audit Institutions, Cadastre, National Bank of Serbia, etc. The trainings refer to the activities in corruption cases, but also financial investigations and seizure of property obtained through corruption.

In cooperation with the organisation "The Whistle" more than 800 judges of basic, higher and appellate courts, more than 100 prosecutors and more than 100 lawyers attended the training which ensured the acquisition of the necessary knowledge and skills for conducting trials in cases which refer to the protection of whistle-blowers.

**DATA ON CARRIED OUT TRAININGS IN THE JUDICIAL ACADEMY ON ANTI-CORRUPTION, ETHICS AND INTEGRITY FOR THE PERIOD 2015-2019**

<b>Year</b>	<b>Name of Training</b>	<b>Number of Training</b>	<b>Target Group and Number of Participants</b>	<b>Training Content</b>
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2016	TRAINING OF LECTURERS FOR ETHICS AND INTEGRITY IN THE JUDICIARY SYSTEM	2 trainings for training of lecturers	15 judges and 14 Public prosecutors	Training content: <ul style="list-style-type: none"> <li>• Definition of the training programme</li> <li>• Presentation skills</li> <li>• Definition of hypothetical questions for a discussion</li> </ul>
	ETHICS AND INTEGRITY IN THE JUDICIARY SYSTEM	8 workshops	96 judges and 89 public prosecutors	Training content: <ul style="list-style-type: none"> <li>• Domestic and international framework for judge's / prosecutor's ethics</li> <li>• Conflict of interest and ethics on the Internet</li> <li>• Disciplinary procedure in case of violation of judge's / prosecutor's ethics</li> <li>• Resolution of ethical dilemmas and hypothetical situation related to the implementation of ethical standards</li> </ul>
2017	ETHICS AND INTEGRITY IN THE JUDICIARY SYSTEM	10 workshops	94 judges and 91 public prosecutors  2x24 trainees of the initial training of the Judicial Academy	Training content: <ul style="list-style-type: none"> <li>• Domestic and international framework for judge's / prosecutor's ethics</li> <li>• Conflict of interest and ethics on the Internet</li> <li>• Disciplinary procedure in case of violation of judge's / prosecutor's ethics</li> <li>• Resolution of ethical dilemmas and hypothetical situation related to the implementation of ethical standards</li> </ul>

2018	ETHICS AND INTEGRITY IN THE JUDICIARY SYSTEM	14 workshops	95 judges, 89 misdemeanour judges, 94 public prosecutors	<p>Training content:</p> <ul style="list-style-type: none"> <li>• Domestic and international framework for judge's / prosecutor's ethics</li> <li>• Conflict of interest and ethics on the Internet</li> <li>• Disciplinary procedure in case of violation of judge's / prosecutor's ethics</li> <li>• Resolution of ethical dilemmas and hypothetical situation related to the implementation of ethical standards</li> </ul>
	ETHICS FOR CIVIL SERVANTS (employees in the High Judicial Council)	2 workshops	41 employees	<p>Training content:</p> <ul style="list-style-type: none"> <li>• Ethical code of civil servants – implementation and disciplinary accountability</li> <li>• Ethical culture and ethical decision making</li> <li>• Conflict of interest</li> <li>• Ethical dilemmas and resolution of hypothetical cases related to the implementation of the ethical code</li> </ul>
2019	ETHICS AND INTEGRITY AND PREVENTION OF CORRUPTION IN THE JUDICIARY SYSTEM	12 workshops	4 judges, 4 for public prosecutors and 4 for misdemeanour courts	<p>Ethical code, Ethical culture and ethical decision making, Prevention of the conflict of interest, resolution of ethical dilemmas and 4 hypothetical questions related to the implementation of the ethical code</p>

In 2017, the National Academy of Public Administration was established as the central institution of the professional development in the administration of the Republic of Serbia – with the status of a publicly acknowledged organiser of activities of informal adult education, which established its competences in 2018. Within the General Training Programme for civil servants in 2019, a special field of professional development was defined – **fight against corruption** containing several thematic units, including: Prevention of the conflict of interest and control of property of the officials, Integrity Plan and a mechanism for preventing corruption (self-assessment of risks of corruption in institutions), Right to Access the Information of Public Importance, Protection of Whistle-blowers. The 2019 General Training Programme for employees in local self-government units, in the field of professional development called GOOD GOVERNANCE, defines, *inter alia*, training programmes for the following thematic units: Development and Implementation of Local Anti-Corruption Policies; Creation and Implementation of the Ethical Code of Officials and the Code of Conduct of Servants and Appointed Officials in Local Self-Government Units; Realisation of the Right to Access the Information of Public Importance; Whistle-blowing and protection of whistle-blowers.

Within the Cooperation Plan of the MoI and OSCE Mission to the Republic of Serbia for 2018, police officers of the Sector of Internal Control of the MoI had a study visit to the General Directorate for the Fight against Corruption of the MoI of Romania, with the aim to learn about the manner of carrying out corruption risk analyses and integrity tests. The OSCE Mission to the Republic of Serbia organised a two-day training for carrying out corruption risk analysis for 20 participants in Belgrade (police officers of the Sector of Internal Control, Police Directorate, Secretariat and Customs Administration) and a three-day seminar for police officers of the MoI with the aim to clarify the manner of carrying out the corruption risk analysis.

In September 2018, there was a study visit of the representatives of the General Inspection for Security Protection of Czech Republic to the MoI, and in November of the same year, there was a study visit of the representatives of the MoI to the General Inspection of the Czech Republic with the aim to learn about the competences of the two services and the implementation of new institutes in the prevention and suppression of corruption, with a special accent on carrying out the integrity test, since the mentioned inspection has years of experience in its implementation.

Police officers of the Sector of Internal Control participated in the training named “Integrity Test” where the lecturers were the representatives of the General Directorate for Fight against Corruption of the MoI of Romania.

In March 2019, the realisation of the twinning project “Strengthening the capacities of the Sector of the Internal Control for Fight against Corruption in MoI” started within the 2015 IPA programme with the twinning partners from the Republic of Lithuania and Romania. The twinning programme, which is to last 18 months, includes the education of police officers of the Sector of Internal Control on carrying out preventive institutes in suppressing corruption, operational analytics and specialised trainings for corruption cases, as well as the improvement of the IT system of the Sector of Internal Control. In May and June 2019, there was the need analysis for trainings and creation of operational procedures.



The MoI members participate in the realisation of the project “Regional Police Cooperation and Creation of Integrity in the West Balkan Region”, which implementation was started in early 2019, and will continue in the coming three years. Within that project, police offices of the Sector of Internal Control participated on the regional meeting of the heads of services of internal control, department for professional standards in April 2019 (Skopje, Republic of North Macedonia). The goal of this regional meeting was the exchange of information about current and planned activities, challenges and best practice, as well as definition of the areas of cooperation in strengthening the capacities for the prevention of corruption and the implementation of new institutes in order to suppress corruption (corruption risk analysis, integrity test and property status assessment).

In cooperation with the OSCE Mission to the Republic of Serbia and the Geneva Centre for Democratic Control of Arm Forces, MoI organised a workshop on 12 June 2019 named “Integrity Plan and Methodology for Corruption Risk Management”, presenting the publication “Guidelines for carrying out corruption risk analysis in MoI”, so that the MoI employees participating in the work of working groups for carrying out the corruption risk analysis could get informed about each phase of the implementation of activities on risk analysis and tasks of the working group.

Within the 2015 IPA EU programme, a procurement of IT, audio and video equipment was made in the amount of EUR 750.000 for the need of strengthening the technical capacities of the MoI.

MoI is a member of the network “European partners for fighting corruption – ERAS”, consisted of the services for police surveillance and anti-corruption agencies.

The MoI Sector of Internal Control participates in the realisation of the project “Strengthening the protection of human rights of persons deprived of liberty and convicted persons in Serbia”, within the joint programme of the European Union and the Council of Europe “Horizontal Facility for Western Balkans and Turkey”. In May 2019, the Phase I was completed, and the Phase II of this project will start in the next period.

In addition to the international operational cooperation the police officers of the MoI participated in the international and regional meetings:

- Third regional forum on internal control service (Sofia – Republic of Bulgaria) in November 2018.
- 18<sup>th</sup> annual conference of the network European Partners for Anti-Corruption – “PAC” (Rust – Republic of Austria) in October 2018.
- Conference “Ethics and Integrity at the Borders of Romania – international institutional dialogue”, (Bucharest – Romania) in December 2018.

Sector of Internal Control of MoI has an established open phone line for reporting corruption, and other illegalities in the work made by police officials and other MoI employees in the work or in relation to the work. During the working time police offices of the Sector talk with the citizens about their profession, and outside their working time the citizens can leave them notes.

A leaflet and a poster were created for reporting corruption in MoI in Serbian and English, so that Serbian citizens and foreign citizens could get informed about how to report incidence of

corruption in MoI. The posters and leaflets are placed at border crossings and facilities of the regional police administrations of the MoI.

Every year the Ministry of Culture and Information makes a call for co-financing of projects of production of media contents in the field of public information and grants funds for the realisation of projects on reporting and investigating corruption in various fields of social life which ensures genuine, impartial, timely and full information of all the citizens, i.e. it contributes to the raising of the awareness among the citizens about the corruption and violation of human rights. In the light of that the Ministry co-financed four projects in 2019 with the total amount of RSD 1.7000.000,00.

Also, in a special competition, funds are allocated for the projects organising professional and scientific meetings dealing with the improvement of media and journalism, i.e. strengthening of professional capacities of media officers (journalists, managers, researchers, experts in the field of media law) to investigate and report on dangers of corruption phenomena in the society. The total of RSD 1,500,000.00 has been allocated for the project “Strengthening the capacities of journalists for reporting on public finances of local self-governments”.

### **Challenges and examples of good practice regarding the integration of human rights in the national strategies and anti-corruption policies**

Serbian Chamber of Commerce made and published the anti-corruption standards and practice such as: Business Ethics Code, Corporative Management Code, and it promotes: the rules of the International Chamber of Commerce for Fight against Corruption, the rules of the Anti-Corruption Declaration of the Global Response of Serbia, and the economic entities which have adopted the anti-corruption plans or integrity plans.

With the adoption of the Business Ethics Code<sup>39</sup> and the Corporative Management Code<sup>40</sup> in December 2005, the Republic of Serbia became one of the countries which have their own national business ethic code and the corporative management code, which contributes with its nature to the further development of autonomous law and business practice based on ethical principles.

General Meeting of Serbian Chamber of Commerce adopted the new Corporative Management Code on 17 September 2012<sup>41</sup>. The principles and recommendations contained in that Code are not binding, however, they are recommended to all capital companies, especially to members of the Serbian Chamber of Commerce, as the best practice of corporative management. Capital companies can apply the principles and recommendations of that Code directly by making a decision in the competent body of the company, or, if necessary, they can develop them by the adoption of their own corporative management code, i.e. adoption of other internal acts of the company. Capital company, which is a member of the Serbian Chamber of Commerce is obliged to inform the Chamber if it applies that Code. A capital company which does not apply the Corporative Management Code of Serbian Chamber of Commerce, must inform the Chamber

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<sup>39</sup>“Official Gazette of RS”number 1/2006

<sup>40</sup>“Official Gazette of RS”number 1/2006

<sup>41</sup>“Official Gazette of RS”number 99/2012

about the corporative management code it does apply and the place where that code is available at the web portal of the company.

Serbian Chamber of Commerce is a member of the International Anti-Corruption Commission, International Chamber of Commerce from Paris and has an established practice of sharing material in various meetings in the Chamber of Commerce of Serbia regarding the rules and guidelines of the International Chamber of Commerce for the fight against corruption.

Serbian Chamber of Commerce is a member of the network of the international organisation Global Response in Serbia, founded by the United Nations. During the time the secretariat of the network was organisationally placed on its premises and while it chaired the Working Group for the fight against corruption, the “Anti-Corruption Declaration” was initiated in the Republic of Serbia, which signatory was also Serbian Chamber of Commerce.

At the internet portal of Serbian Chamber of Commerce, the following information is uploaded: Business Ethics Code of Serbian Chamber of Commerce, Corporative Management Code, standards of the International Chamber of Commerce for the fight against corruption, Anti-Corruption Declaration, Global Response of Serbia, example of good practice of companies in the field of anti-corruption.

***In the second quarter of 2018, Serbian Chamber of Commerce continued with the activities on the realisation of EU Projects “Anti-Corruption Manual for Small and Medium-Sized Enterprises (SME)”:***

- In 2018, activities were continued on the realisation of the approved project under the European programme “Economic and financial crime, corruption, environmental crime” in the field of company anti-corruption named “Anticorruption toolkit for SME sector”. The Project participants are Italian Chamber of Commerce, Romanian Chamber of Commerce and Eurochambers. The project involved the research of the company on the territory of Italy Romania and Serbia on the topic of exposure of the company work to potential corruption. Based on the research results the manual was created for small and medium-sized enterprises (with a special focus on micro enterprises), on the topic of protection from potential corruption in operations, the project started with the activities in February 2016 and was completed in April 2018.

- “C-detector on-line”–At the home page of the portal of Serbian Chamber of Commerce a link is given where members of Serbian Chamber of Commerce can test the risk of corruption in their company in a fast and simple way, through the given questionnaire. The result of the responses to the questionnaire is in the PDF file, giving the advice for the improvement of the integrity of the company and for reduction of corruption risk. <http://www.c-detector.eu/>

- The Manual “Anticorruption toolkit for SME”– is one of the results of the Project. The purpose of this toolkit is that micro and small and medium-sized enterprises operating in Europe are provided with the reference, so that they could establish relevant instrument for the prevention and suppression of corruption. Furthermore, it provides guidelines for the identification of proper measures for fighting against corruption in this quite concrete but fundamental segment of the European market. Micro, small and medium-sized enterprises are selected as the target

group of this project not only for representing 99.8% of all EU enterprises, but primarily because of their nature as small entities. That makes them specially vulnerable to cyclical trends in economy, in the context of often complicated ones.

- “Methodology Manual – Analysis and treatment of corruption risk in small and micro enterprises” – is one of the results of the project. The manual provides an overview of the method developed and tested within the project, which aim is to analyse the trends of corruption established among micro, small and medium-sized enterprises and in public administration, for defining the relevant tools for the prevention and fight against such criminal acts. The purpose of that manual is the introduction of the method of Anticorruption toolkit for SME in all organisations, research centres, associations or institutions in Europe wanting to replicate the experience of the project “Anticorruption Toolkit for SME sector” for analysing the corruption risks and definition of a set of useful measures for micro/SME in order to prevent corruption risks.

### ***Anticorruption events of Serbian Chamber of Commerce in 2018***

- National Conference of the Project “Anticorruption Toolkit for SME sector” was held on 29 March 2018. The results were presented in the conference held in the Serbian Chamber of Commerce to the representatives of public authorities and members of the Serbian Chamber of Commerce. The conference was attended by 50 participants;

- Infor Day “Programme of the European Union for small and medium-sized enterprises”, on 20 April 2018 – in Serbian Chamber of Commerce HPPO Zrenjanin a round table was held. The main goal of the meeting was the presentation of the EU programme and the financial instruments for the support to small and medium-sized enterprises and possibilities for their implementation in the Republic of Serbia, and the presentation of services of the European entrepreneurial network which facilitate the access to those programmes;

- Info Day “Programmes of the European Union for small and medium-sized enterprises”, 25 April 2018 – in Serbian Chamber of Commerce – HPPO Valjevo, a round table was held in Šabac. The event was organised with the aim to present the programme and financial instruments of the EU, and the possibilities for their implementation in the Republic of Serbia;

- In the third quarter of 2018, activities were continued on the promotion of “C-detector on-line”, which is placed on the home page of the portal of Serbian Chamber of Commerce. The link and the explanation for the use of that questionnaire was provided to mail addresses through 300 small and medium-sized enterprises. The desired goal is the promotion and the use of the toolkit, as the first form of self-assessment of the exposure of small and medium-sized enterprises to the corruption risks, and the promotion of the advice for the improvement of anticorruption ability of those companies. The result of the response to the questionnaire of small and medium-sized enterprises is in a PDF file giving advice for the improvement of the integrity of the company and the reduction of corruption risk.

- 11 December 2018 - Compliance breakfast—in the organisation of Serbian Chamber of Commerce and the European Institute for Compliance and Ethics in operations from Slovenia, a Compliance breakfast was held in Belgrade. The meeting was attended by 56 participants, representatives of economic entities operating in Serbia, representatives of the Institute from Slovenia and a representative of the Anti-Corruption Agency of Serbia. The aim of the event organization is to further promote the introduction of compliance function and comprehensive compliance program to ensure systematic management of compliance and ethical risks in the operations of companies, lack of precise regulations and guidelines for the introduction of compliance programs, condition different understandings of competencies, methodology and organization of compliance function in the domestic field.

In the first half of 2019 the activities of Serbian Chamber of Commerce and the Anticorruption Team of Serbian Chamber of Commerce were continued on the fight against corruption. The cooperation was continued with the European Institute for Compliance of the activities and business ethics from Slovenia on the organisation of the Annual Conference in Bled, in November this year and the participation of the members of Serbian Chamber of Commerce within the Compliance community consisted of almost 100 economic entities and individuals.

Through its representative in the Counselling Board, Serbian Chamber of Commerce participated in the research project “Business Integrity Country Agenda” carried out by “Transparency Serbia”, with the support of the European Bank for Reconstruction and Development, which tests the preconditions for a successful fight against corruption in business environment. The first meeting of the Counselling Board was held on 3 June 2019.