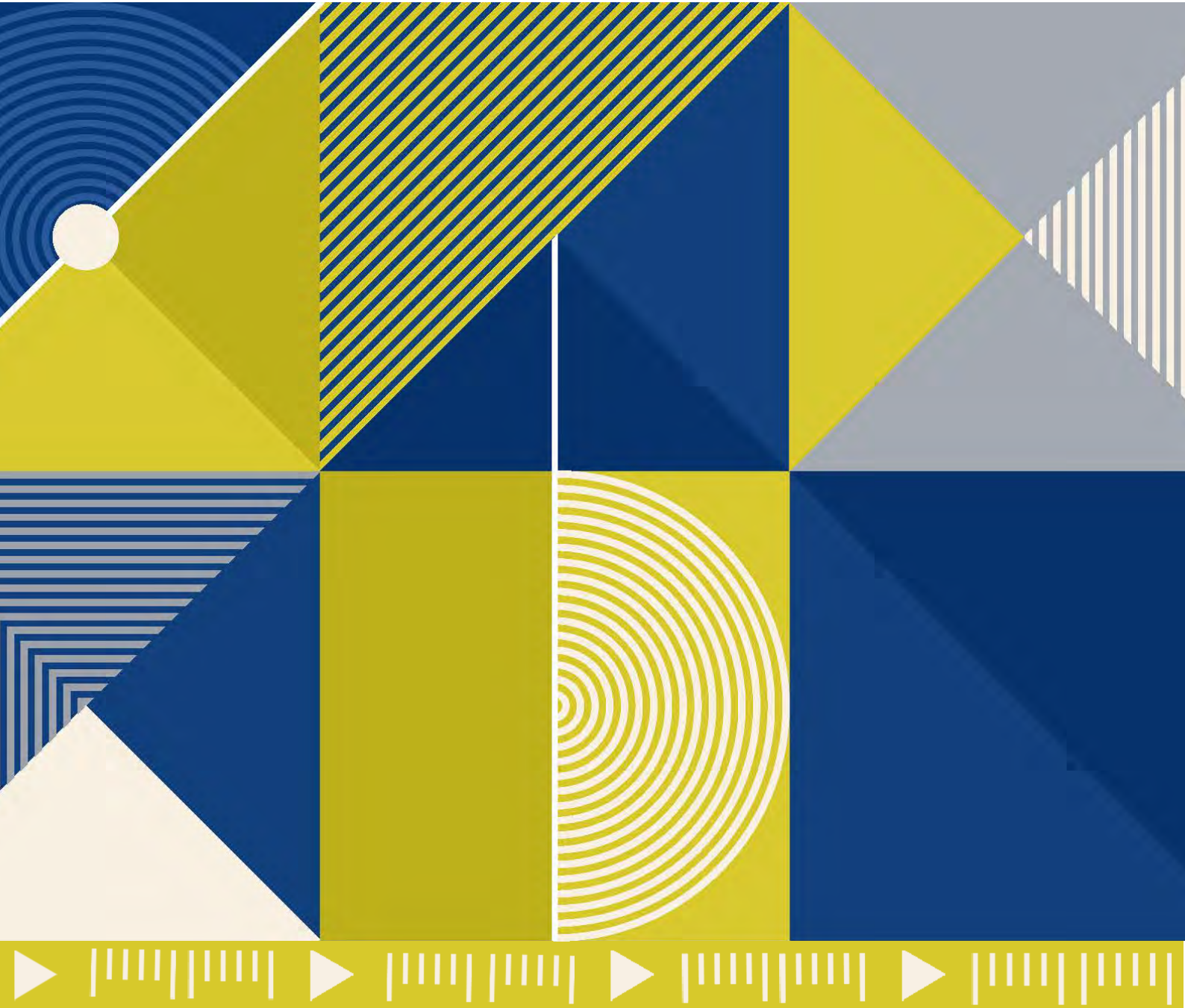




Istanbul Anti-Corruption Action Plan 5th Round of Monitoring **Assessment Framework**



OECD Anti-Corruption Network for Eastern Europe and Central Asia

Istanbul Anti-Corruption Action Plan

5th Round of Monitoring

Assessment Framework



This document is an integral part of the OECD Anti-Corruption Network for Eastern Europe and Central Asia (ACN) Work Programme 2023-2026. The document was **approved** at the 27th ACN Steering Group meeting on 17 November 2022.

For more information, please contact Mrs. Rusudan Mikhelidze, rusudan.mikhelidze@oecd.org.

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About the ACN

The Anti-Corruption Network for Eastern Europe and Central Asia ([ACN](#)) is a global relations programme of the [OECD Working Group on Bribery in International Business Transactions](#) (OECD WGB). The ACN was established in 1998 to promote anti-corruption reforms in Eastern Europe and Central Asia, to bring non-OECD member countries of the region closer to international anti-corruption standards and to strengthen their implementation through peer review, peer learning and experience exchange.

The ACN Steering Group is comprised of National Coordinators from the ACN countries, donors, and other relevant stakeholders. Civil society contact points contribute to its work through participation in its various activities. The Steering Group's annual meetings provide a framework for regional experience exchange and stakeholder consultations. High-Level Meetings of anti-corruption decision-makers are convened to reaffirm the commitment to the reforms and endorse new Programmes of Work of the ACN. The Secretariat of the ACN is a part of the Anti-Corruption Division in the OECD Directorate for Financial and Enterprise Affairs.

About the Istanbul Anti-Corruption Action Plan

The [Istanbul Anti-Corruption Action Plan \(IAP\)](#) is a flagship peer review programme of the ACN involving ten countries: Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Mongolia, Ukraine, Uzbekistan and Tajikistan.¹ Since its launch in 2003, the IAP has been promoting anticorruption reforms through comprehensive reviews.

The IAP methodology is based on the working methods of the Working Group on Bribery, but its substantive scope is broader, covering all forms of corruption, including active and passive domestic and international bribery, and a range of policy, preventive, and law-enforcement measures against corruption. The IAP process is not linked to one specific international law instrument. Its reviews rely on international standards and good practices relevant to the region, in particular, the IAP countries.

The IAP is known for high standards of transparency and inclusion. Representatives of civil society, business and the international community contribute to all steps of country reviews. The ACN and OECD members participate in the IAP as experts and donors.

The following sources of information are used for IAP monitoring: replies to the monitoring questionnaire provided by national authorities and non-governmental stakeholders, including civil society, business, and international partners; information and clarifications obtained during and after on-site visits; and independent research by the monitoring team, which includes monitoring experts and ACN Secretariat. Reports are discussed and adopted at the ACN plenary meetings. All reports are published on the ACN website.²

¹ Armenia, Azerbaijan, Georgia, Tajikistan, and Ukraine joined this initiative at the ACN General Meeting in 2003 in Istanbul, Turkey. Kyrgyzstan joined the Action Plan in 2003 and Kazakhstan in 2004. Uzbekistan joined in 2010, Mongolia in 2012 and Moldova in 2020.

² Monitoring reports are available here: <https://www.oecd.org/corruption/anti-bribery/corruption/acn/istanbul-action-plan.htm>.

Since its launch in 2003, the implementation of the Istanbul Anti-Corruption Action Plan has evolved into the following stages:

1. **Review of legal and institutional frameworks for fighting corruption.** Istanbul Action Plan countries prepared self-assessment reports on the basis of standard guidelines drawn up by the Secretariat. Groups of experts from ACN countries reviewed these self-assessment reports (without on-site visits) and developed recommendations covering three main areas: (1) anti-corruption policies and institutions, (2) criminalisation of corruption and law enforcement, and (3) preventive measures in public service. ACN plenary meetings discussed and adopted country assessment reports and recommendations based on consensus. These reviews were completed during 2003-2005.³
2. **The 1st round of monitoring.** The first round of monitoring was based on answers to individual Monitoring Questionnaires prepared by the Secretariat for each country. Groups of experts from ACN countries reviewed these answers and visited the countries to collect additional information. On the basis of the answers to the questionnaire and information gathered during the on-site visits, experts developed draft monitoring reports, which included assessments of progress and compliance ratings ranging from fully, largely to partially, or not implemented. The draft monitoring reports were presented for discussion and adoption at plenary meetings. The first round of monitoring was implemented during 2005-2007. The summary report about the first round of monitoring was published in 2008.
3. **The 2nd round of monitoring.** The second round of monitoring revisited the level of countries' compliance with recommendations given at the initial country review but included three new elements: (1) it involved the Standard Monitoring Questionnaire based mainly on the UNCAC standards; (2) the monitoring reports based on a desk review of questionnaires and on-site visits included updated compliance ratings for the previous recommendations as well as new recommendations; (3) upon the completion of the monitoring, the Secretariat organised return missions to the monitored countries to present the reports to the public officials, civil society and international partners in order to promote the implementation of the recommendations. The second round of monitoring was completed during 2009-2012.⁴ The summary report about the second round of monitoring was published in 2013.
4. **The 3rd round of monitoring.** The third round of monitoring aimed to promote compliance of the participating countries with the international anti-corruption standards and good practices with a focus on the practical implementation of anti-corruption measures and recommendations adopted in the second round. It involved country-specific questionnaires, on-site visits, adoption of reports with compliance ratings, new or updated recommendations and return missions. The third round was completed during 2013-2015.⁵ The summary report about the third round of monitoring was published in 2016.

³ Except the reviews of Uzbekistan and Mongolia that took place respectively in 2010 and 2014, based on the standard questionnaire developed for the second round of monitoring.

⁴ Uzbekistan underwent joint first and second round of monitoring in 2012 and third round in 2015.

⁵ Mongolia underwent joint first and second round of monitoring in 2015; it will undergo a joint third and fourth round of monitoring under this Work Programme.

5. **The 4th round of monitoring.** The fourth round of monitoring focused on enforcement and practical implementation, as well as the impact of anti-corruption measures. It also included an in-depth examination of a specific sector with a high risk of corruption, selected for each country individually based on defined criteria. The sector review assessed the practical application of anti-corruption policy, prevention, and enforcement measures in the chosen sector. The fourth round was completed in 2019, and the summary report was published in 2020.
6. **Regular updates.** After the adoption of the country reports, the Istanbul Action Plan countries prepared their updates about measures taken to implement the recommendations and presented them for discussion at each plenary meeting to ensure follow-up. During the third round of monitoring, the methodology of progress updates was revised to include the assessment of updates by peers and their adoption by the plenary meetings, including the ratings indicating progress or lack of progress in implementing the recommendations. During the fourth round, the methodology was further streamlined, and an additional level of assessment of progress was introduced.

Objectives, principles, and novelties of the 5th round of monitoring

The ACN Steering Group revamped the Istanbul Anti-Corruption Action Plan introducing several novelties for the 5th round of monitoring as a part of the outline of the ACN Work Programme 2020-2024.⁶ The ACN Steering Group decided to test the new indicator-based methodology of the 5th round of monitoring in a pilot, given its novelty and complexity. The pilot monitoring was conducted in 5 countries using pilot indicators. The reports were published in the spring of 2022,⁷ and a thorough revision process of the assessment framework was carried out in the first half of 2022.

The 5th round will cover 9 areas of performance with a focus on high-level corruption, practice, and enforcement. While the substantive scope of the 5th round remains comprehensive, covering anti-corruption policy, prevention of corruption and criminal responsibility for corruption, the Steering Group decided to narrow it down to core anti-corruption functions and activities building on progress and challenges in the IAP countries.⁸

One of the main novelties of the IAP 5th round of monitoring is the introduction of a normative framework for peer reviews: a set of narrowly defined benchmarks based on international standards and good practices. The benchmarks codify the IAP monitoring practice, in particular reflecting recommendations of the Summary Report for the 4th round of monitoring. The previous monitoring rounds did not use such a uniform framework, and the monitoring teams tailored individual recommendations for each monitored country based on international anti-corruption standards and good practices. Measuring country performance against a pre-defined uniform set of benchmarks aims at ensuring higher objectivity, consistency, and transparency of country assessments.

⁶ <https://www.oecd.org/corruption/acn/OECD-Anti-Corruption-Network-Work-Programme-2020-2024-ENG.pdf>

⁷ Read pilot monitoring reports for [Armenia](#), [Azerbaijan](#), [Georgia](#), [Moldova](#), and [Ukraine](#).

⁸ Summary Report “[Anti-Corruption Reforms in Eastern Europe and Central Asia, Achievements and Challenges, 2016-2019](#)”.

The next new feature is the increased frequency of monitoring compared to the previous rounds. Reviews will be annual, subject to available resources. The annual reviews aim at promoting faster progress in meeting the benchmarks. Previous IAP rounds envisaged monitoring reports every 3-4 years. Annual progress updates on the implementation of recommendations in-between these reports used a lighter procedure without a full cycle of monitoring. In the 5th round, the reviews will comprise all stages of monitoring for higher quality and depth of substantive evaluations. Progress updates will be discontinued, and compliance with the 4th monitoring round recommendations will not be assessed.

Another novelty is the indicator-based assessment and **scoring system** to calculate country ratings, described below in detail, developed based on the OECD's relevant experience and lessons learnt in the pilot monitoring. The new scoring system aims at minimising subjectivity and discretion, increasing precision and removing cross-country inconsistencies in ratings. In the previous rounds, ratings were determined by monitoring teams in relation to individual recommendations using the scale: non-compliant, partially compliant, largely compliant, and fully compliant, without sufficiently clear criteria or detailed guidance on how to assign them.

The following principles of the IAP monitoring will remain in place for the 5th round of monitoring:

Peer review methodology – the monitoring will be conducted as an intergovernmental peer review process, where experts from the ACN countries review IAP countries. Experts from IAP countries will be systematically involved in the monitoring, along with those from the OECD countries to ensure the transfer of experience. Representatives of international organisations may also take part as members of the monitoring team.⁹

Transparent monitoring process – transparency will remain an important feature of the IAP. Monitoring reports will undergo thorough consultations and open discussions at plenary meetings involving all ACN country delegates, non-governmental and international partners. All reports will be published in full on the ACN website. National Coordinators will be invited to translate, publish, and disseminate reports on the official government websites of their countries.

Inclusive participation of non-governmental stakeholders will continue to be promoted, including contributions to the preparation of monitoring reports and participation in on-site visits, bilateral consultations on draft reports and plenary meetings. Alternative reports and other materials will be solicited from non-governmental partners and taken into account in the country assessments, as described further in this document.

Equal treatment and consensus-based decision-making – as in the previous monitoring rounds, the reports will be developed in a manner that ensures equal treatment to all countries, applying the same uniform benchmarks, rules, and procedures. The reports will be adopted by consensus, whereby countries undergoing monitoring are included in the decision-making process.

Coordination with other international organisations will continue to be an important part of the IAP process to ensure that monitoring reports consider and use the assessments carried out under different international frameworks. ACN Secretariat will ensure regular coordination

⁹ For evaluating sections on integrity in public procurement and business integrity, the ACN will partner with the EBRD.

with the EU and the OGP as partner organisations under the [EU for Integrity Programme](#) and with the Group of States against Corruption (GRECO) of the Council of Europe and the United Nations Office on Drugs and Crime (UNODC).

Schedule for the 5th round of monitoring

The 5th round of monitoring will be launched in November 2022, at the ACN High-Level Meeting. During the 5th round, the ACN monitoring plenaries will take place once a year to adopt monitoring reports. The first reviews launched in November 2022 will establish the baseline assessment for Eastern Partnership countries in 2023,¹⁰ followed by Central Asian countries in 2024. The following reviews will be annual (subject to available resources) to promote progress through frequent in-depth follow-up on the developments in the IAP countries.

Main stages of reviews under the 5th round of monitoring

The 5th round of monitoring country reviews will involve the following key stages:

- Sending standard monitoring questionnaires to national coordinators and non-governmental stakeholders of monitored countries;
- Receiving replies to the questionnaires;
- Preparing a preliminary draft monitoring report;
- Country (physical or virtual) on-site visit;
- Finalising the draft report;
- Bilateral discussions of the draft report with the monitored country;
- Adoption of the report at a plenary meeting;
- Publication of the adopted report.

The schedule of the 5th round of monitoring reviews will follow the standard timeline of the IAP monitoring process. To start preparations for each country review, the Secretariat will develop a country schedule using the model schedule provided below. Reviews will be conducted in English or in Russian, depending on the choice of the country and the language skills of the monitoring team. Once the language of the review is agreed with the National Coordinator, only one language will be used throughout the monitoring. All monitoring-related communication will be conducted via email. On the request from the National Coordinator, the Secretariat may send an official letter to the Government of the respective country to request high-level support for the monitoring, if necessary.

¹⁰ Considering the war in Ukraine, the monitoring of Ukraine may be postponed.

Model timeline for country reviews

Action	Responsibility	Deadline
BEFORE ON-SITE		
Establishing the schedule	Secretariat, National Coordinator	16 weeks
Establishing the monitoring team	Secretariat in consultation with ACN countries	16 weeks
Sending the standard questionnaire to the country	Secretariat	15 weeks
Sending the questionnaire to non-governmental stakeholders	Secretariat	15 weeks
Submission of answers to the questionnaire by the National Coordinator and non-governmental stakeholders	National Coordinator, non-governmental stakeholders	6 weeks
Sending additional questions to the Government, if necessary	Secretariat	5 weeks
Submission of answers to the additional questions	National Coordinator	4 weeks
Preparation of the preliminary report with questions for the on-site visit	Monitoring team	2 weeks
Preparation of the agenda of the on-site visit (public institutions)	Secretariat in consultation with the National Coordinator	2 weeks
Preparation of the panels with non-governmental stakeholders	Secretariat in coordination with non-governmental stakeholders	1 week
BEFORE PLENARY		
On-site visit (5 days, when physical)	Monitoring Team, National Coordinator, authorities, non-governmental stakeholders	17 weeks
Additional meetings (virtual) if necessary	Monitoring team, National Coordinator, authorities	16 weeks
List of additional information requests sent to the country	Monitoring team	16 weeks
Additional information submitted to the ACN Secretariat	National Coordinator	15 weeks
Draft report sent for consultations to National Coordinator and non-governmental stakeholders	Monitoring team	11 weeks
Draft report sent for translation, if applicable	Secretariat	11 weeks
Comments to the draft report received by the Secretariat	National Coordinator and non-governmental stakeholders	7 weeks
Draft report revised and sent to the country and stakeholders	Monitoring Team	5 weeks
Country to flag issues for the first round of bilateral meeting	National Coordinator	4 weeks
The first round of bilateral consultations with the country	Monitoring team, National Coordinator, and non-governmental stakeholders as relevant	3 weeks
Finalised draft report distributed to the participants of the plenary meeting	Monitoring team	2 weeks
Country to flag issues for the second round of bilateral consultations	National Coordinator and non-governmental stakeholders	1 weeks
The second round of bilateral consultations with the country	Monitoring Team, National Coordinator, and non-governmental stakeholders as relevant	At plenary
Adoption of the report at a plenary meeting	ACN Plenary	At plenary
AFTER PLENARY		
Publishing the report and the press release	Secretariat	4 weeks

Letter to Prime Minister/President/Speaker of Parliament of the monitored country with the report attached	Secretariat	6 weeks
Translation of the report into the national language and its publication on the governmental website	National Coordinator	8 weeks

Establishing the monitoring team

A monitoring team consists of peer review experts and representatives of the ACN Secretariat. The Secretariat will establish a monitoring team for each monitored country by selecting experts with the necessary qualifications, profiles, and language skills. For this purpose, the Secretariat will approach individual experts recommended by the ACN National Coordinators or by other ACN partners (e.g., other OECD divisions, other international organisations, and partners), or whose qualifications and suitability to perform this work are known to the Secretariat through previous engagements. The Secretariat will inform the National Coordinators of the monitored country as well as the countries of the monitoring experts about the final compositions of monitoring teams.

The monitoring experts should have significant knowledge and experience in one or several of the Performance Areas covered by the monitoring, should be familiar with the relevant international standards and good practices, should be able to work in multi-cultural groups, and speak and write in the chosen language of the review. Monitoring teams will be assembled with a view to ensure a balance of expertise, gender, and country representation. The Secretariat will seek to ensure that IAP countries are represented in these teams.

Monitoring experts shall:¹¹

- Declare any possible conflict of interest to the ACN Secretariat;
- Review answers to the monitoring questionnaire from the government and non-governmental stakeholders, raise additional questions, if necessary;
- Review answers to additional questions, carry out additional research, study any publicly available relevant information¹² and contribute to the preparation of the preliminary draft report;
- Study the preliminary draft report before the on-site visit;
- Participate in country on-site visit, including panels with public authorities, as relevant, NGOs, experts, academia and foreign missions, and chair panels on the themes assigned to them;

¹¹ Updated manual for the monitoring experts, including tasks as well as practical information on the 5th round of monitoring will be prepared later based on the existing [manual](#).

¹² Any publicly available information on the evaluated country's activities within the scope of the monitoring can be examined by the expert, including official government data, reports by international organisations, academia, media or NGOs.

- Contribute to the drafting of the relevant sections of the report, review comments provided to the draft report, and contribute to the finalisation of the draft report for bilateral consultations and plenary meetings;
- Present the draft report and actively participate in the debate during the bilateral and plenary meetings;
- Contribute to the finalisation of the report, on the basis of bi-lateral discussions and plenary meetings for publication.

A representative of the ACN Secretariat will act as a Team Leader for each country. The Team Leader will coordinate the distribution of themes among the experts and chair introductory and closing sessions during the country on-site visit, as well as bilateral consultations on the draft report. The Team Leader will also be responsible for coordinating timely drafting of the report and its quality. The ACN Secretariat will coordinate communication between the monitoring team, the National Coordinator, and other stakeholders involved in the monitoring.

Questionnaires and preliminary draft report

The Secretariat will elaborate standard government and non-governmental stakeholder questionnaires for the 5th round of monitoring. The country questionnaire will include questions and requests for supporting material, including documents, statistics, links to websites or else. The National Coordinators will be invited to provide answers to the questions in the questionnaire and supporting documents on behalf of the monitored country. For this purpose, they will engage with all relevant state bodies to obtain information on time, ensure that all questions receive a full and substantiated reply, finalise, and consolidate replies to the questionnaire and supporting documents and submit them to the Secretariat according to the agreed schedule. The National Coordinators will be responsible for the completeness, accuracy, and timely provision of answers.

Answers to the questionnaire should be provided in an electronic form suitable for editing, e.g., as a Word Document. Supporting documentation should be enclosed and numbered according to the numbering used in the questionnaire. Answers and documents should be submitted in the chosen language of the review and should be precise and to the point. The inclusion of information not related to the question or relevant benchmarks should be avoided.

The ACN Secretariat will also invite other stakeholders (civil society, business organisations and international partners) to provide inputs by filling out a separate stakeholder questionnaire.

The monitoring team will review the provided information and may raise additional questions and request additional information before the country visit if necessary. Based on the collected information and desk research, the monitoring team will prepare an initial country assessment in the form of a preliminary draft report that will be further developed and completed at the next stages of monitoring. The preliminary draft report will highlight issues that have not been sufficiently addressed by written answers requiring clarification or additional evidence during the on-site visit. The preliminary draft report will be available to the monitoring team only.

The monitoring team will also prepare a list of questions for each panel of the on-site visit and share it with the monitored country's National Coordinator in advance of the on-site visit to facilitate preparations for and discussions during the visit.

Country on-site visits

Country on-site visits will be physical by default but can be replaced by virtual meetings, if necessary.

The Secretariat will prepare a draft agenda of the on-site visit in consultation with the National Coordinator based on the model agenda provided below. The National Coordinator will ensure that all relevant state authorities are considered for the inclusion as participants to the meetings, will invite state bodies to the meetings, and prepare them for participation in respective thematic panels in accordance with the agenda. The names and positions of each participant must be provided to the Secretariat in advance of the on-site visit, preferably with finalised agenda of the on-site.

The duration of the physical country on-site visit will be up to 5 days. The monitoring team may request additional meetings if the scheduled meetings are not sufficient to obtain the necessary information.

The monitored country will provide a venue for panels with representatives of state bodies and interpretation, if necessary. Although the monitored country is not required to make travel arrangements for the monitoring team, it may consider negotiating for a block of hotel rooms at a government rate at a location convenient to the venue of the monitoring. The monitored country may also provide catering during the on-site visit in-between the sessions and may offer one dinner to the monitoring team.

The model agenda of the visit includes separate panels for each Performance Area. Panels will be chaired by the Team Leader and/or respective expert, as relevant. Monitoring experts must attend their respective sessions but are also encouraged to take part in as many sessions of the on-site as possible to form a holistic view of the country's performance. The on-site visit schedule includes preparatory sessions for the monitoring team, which are open only to the ACN Secretariat and monitoring experts.

On-site visit discussions will focus on those parts of the preliminary draft monitoring report where there are gaps in evidence, or the monitoring team needs clarifications. In addition to the questions shared in advance of the on-site visit with the National Coordinator and the non-governmental partners, the monitoring team may also ask other questions relevant to the monitoring during the on-site visit. During or after the on-site visit, the monitoring team and the Secretariat may request additional information and documents from the National Coordinator.

The Secretariat will be responsible for the organisation of special panels with representatives of non-governmental organisations, business and international partners engaged in anti-corruption and good governance activities in the country. The National Coordinator may suggest to the Secretariat to invite concrete NGOs, experts, academia, business, or foreign partners to these sessions. Government officials cannot take part in these special panels.

Model agenda for a country on-site visit for baseline reports

Day/Time	Morning		Afternoon		Evening
Sunday	Arrival of the monitoring team		Briefing/prep meeting of the monitoring team		
	Panel/Performance Area	Invited participants	Panel/Performance Area	Invited participants	Monitoring Team
Day 1	<p>Introduction with the National Coordinator</p> <p>PA 1 Anti-Corruption Policy</p> <ol style="list-style-type: none"> 1. Evidence-based and up-to-date anti-corruption policy 2. Inclusive and transparent policy development 3. Effective implementation 4. Coordination, monitoring, and evaluation 	<p>Monitoring team and the state agency serving as a National Coordinator of the ACN</p> <ol style="list-style-type: none"> 1. National Coordinator(s) 2. Body responsible for policy development 3. President Administration 4. Prime Minister's Office 5. Parliament 6. Selected focal points of implementing agencies 	<p>PA 2 Conflict of Interest and Asset Declarations</p> <ol style="list-style-type: none"> 1. Legal framework for COI 2. Enforcement of COI 3. Broad, transparent, and digitised asset and interest disclosure 4. Effective verification and enforcement 	<ol style="list-style-type: none"> 1. Institutions responsible for COI policy development and oversight of implementation, including sanctions, methodological guidance, and individual counselling 2. Units/officials in line ministries/state bodies, including in sectors with a high risk of corruption, responsible for enforcement of COI rules 3. Officials responsible for COI policy and oversight in the judiciary, public prosecution service, Parliament, Government, municipalities, and other relevant state bodies 4. Institution(s) responsible for asset and interest disclosure, including collecting asset declarations, electronic system, verification, sanctions, collection, analysis, and publication of data. 5. Judges with the relevant case experience 6. Officials responsible for oversight of asset declarations in the judiciary, public prosecution service and other relevant state bodies, including in sectors with a high risk of corruption 	Debriefing for the day and briefing for the next day
	<p>PA 3 Protection of Whistleblowers</p> <ol style="list-style-type: none"> 1. Legal framework 2. Effective protection mechanisms 3. Dedicated agency 4. Enforcement and routine application of mechanism 	<ol style="list-style-type: none"> 1. Institutions responsible for whistleblower protection reform, such as the Ministry of Justice, Government Administration, Civil Service Agency 2. Institutions/officials responsible for reporting channels and oversight 3. Selected state bodies/top enforcers of the whistleblower protection 4. Judges with relevant case experience 			
Day 2	<p>PA 4 Business Integrity</p> <ol style="list-style-type: none"> 1. Risk management oversight 2. Public disclosure of beneficial ownership, verification, and sanctions 3. A dedicated institution 4. Integrity of SOEs 	<ol style="list-style-type: none"> 1. Business ombudsman/dedicated institution responsible for receiving complaints from companies 2. Ministry of Economy (relevant department/s) and other relevant regulatory bodies (audit and financial control institutions) 3. State agency responsible for SOE policy, monitoring of performance, etc. 4. Specialised anti-corruption body 5. Ministry of Finance 6. Representatives of the five largest SOEs 	<p>PA 5 Public Procurement</p> <ol style="list-style-type: none"> 1. Comprehensive public procurement system 2. Competitive public procurement system 3. Enforcement 4. Transparency 	<ol style="list-style-type: none"> 1. Central public procurement body 2. Procurement units/experts from individual agencies (e.g., health, education, public works) 3. Investigators and prosecutors dealing with cases of corruption in public procurement 4. Body(ies) responsible for complaints and oversight 5. Supreme audit institution 	Debriefing for the day and briefing for the next day
Day 3	<p>PA 6 Judiciary</p> <ol style="list-style-type: none"> 1. Judicial appointment and tenure 	<ol style="list-style-type: none"> 1. Judicial Council and all other similar bodies (e.g., qualification or disciplinary commission of judges, judicial inspection) 	<p>PA 7 Prosecution Service</p> <ol style="list-style-type: none"> 1. Appointment and dismissal of the Prosecutor General 	<ol style="list-style-type: none"> 1. Prosecutorial Council or a similar body (e.g., qualification or disciplinary body) 2. Prosecutors of different levels 	Debriefing for the day and briefing for the next day

	<ol style="list-style-type: none"> 2. Court presidents, judicial remuneration and budget 3. Judicial Council 4. Judicial accountability 	<ol style="list-style-type: none"> 2. Judges of different levels 3. Court administration 4. Ministry of Justice 5. Representatives of the parliamentary committee responsible for legislation on the judiciary, judicial appointments 	<ol style="list-style-type: none"> 2. Appointment, promotion, and accountability of prosecutors 3. Budget, remuneration and performance evaluation of prosecutors 4. Status, composition, functions, and operation of the Prosecutorial Council 	<ol style="list-style-type: none"> 3. HR of the Prosecution Service 4. Officials responsible for the budget of the prosecutor's office 5. Unit responsible for review of misconduct of prosecutors 6. Ministry of Justice 5. Representatives of the parliamentary committee responsible for legislation on the prosecution service 	
Day 4	<p>PA 8 Specialised Anti-Corruption Bodies</p> <ol style="list-style-type: none"> 1. The specialisation of investigators and prosecutors 2. Specialisation in identification, tracing, management and return of illicit assets 3. Appointment of heads of specialised investigative and prosecutorial bodies 4. Adequate powers and transparency of specialised investigative and prosecutorial bodies 	<ol style="list-style-type: none"> 1. Specialised anti-corruption bodies, units, or persons with law enforcement powers 2. Specialised anti-corruption prosecutors (units, bodies, persons) 3. Investigative and prosecutorial bodies, units or persons which have anti-corruption or other related jurisdiction (AML, financial crimes, etc.) 3. Unit/officials responsible for specialised training 4. Unit/officials responsible for the budget of the specialised institution 5. Unit/official with HRM functions 6. Units/persons responsible for public relations/communications of the relevant LE/prosecution bodies. 7. Institutions responsible for asset recovery and management 8. External audit committees/commissions, if an external audit of AC institutions is performed 	<p>Session with Business (See separate agenda)</p>	<ol style="list-style-type: none"> 1. Business associations 3. State-owned companies (optional) 4. SMEs 5. Foreign investors 6. Audit and legal companies 7. Private sector actors as asset managers in criminal proceedings, if any 	<p>Debriefing for the day and briefing for the next day</p> <p><i>Dinner hosted by the monitored country (optional, only one dinner invitation from the government can be accepted by the monitoring team)</i></p>
			<p>A session with International Partners (See separate agenda)</p>	<ol style="list-style-type: none"> 1. Bi-lateral aid agencies 2. Economic and trade attaches 3. International organisations and IFIs 4. International foundations and internationally funded programmes 	
Day 5	<p>PA 9 Enforcement of Corruption Offences</p> <ol style="list-style-type: none"> 1. Enforcement of liability for corruption offences 2. Enforcement of liability of legal persons 3. Enforcement of confiscation measures 4. Detection and prosecution of high-level corruption 	<ol style="list-style-type: none"> 1. Prosecution Service/Police/Ministry of Interior 2. Specialised anti-corruption investigative/prosecutorial bodies 3. Authorities responsible for criminal statistics 4. Law enforcement officers with experience in dealing with corporate liability 5. Ministry of Justice or agency responsible for developing related regulations 6. Institutions responsible for asset recovery and management; related practitioners; FIU 7. Financial analysts and financial investigators dealing with financial investigations in corruption cases 8. Authorities responsible for international cooperation and MLA 9. Law enforcement officials responsible for detection and investigation of HLC/Prosecutors specialised in related cases 10. Criminal court judges/judges with relevant experience 	<p>A session with Civil Society (See separate agenda)</p>	<ol style="list-style-type: none"> 1. TI local chapter, anti-corruption watchdog NGOs and think tanks 2. Media, investigative journalists 3. University professors, academics, and researchers 4. Procurement experts 	<p>Wrap-up session of the Monitoring Team</p>
			<p>Closing session with the National Coordinator</p>		

Drafting monitoring reports

The monitoring team will complete and update the draft report using additional information received during and after the on-site visit. The Secretariat will review the reports to ensure consistent application of the assessment framework in all monitored countries. The monitoring team will finalise the draft report and send it to the National Coordinator and non-governmental stakeholders for consultations, with a request to provide comments in "track changes".

The Secretariat will invite the monitored country to submit any corrections or clarifications to the report it deems appropriate. While the monitored country should not view this as an opportunity to rewrite the report, it should point to areas of significant disagreement to allow the Secretariat to identify the list of issues that may require bilateral consultations.

The monitoring team will update the draft report based on the received comments. If necessary, it will hold a bilateral meeting with the monitored country to clarify comments, to resolve the main issues of disagreement and finalise the draft for sending out to the delegates of the plenary meeting. The non-governmental stakeholders that provided feedback to the draft report may also participate in these bilateral consultations.

The Secretariat will disseminate the updated report to the plenary participants and invite the National Coordinator and non-governmental stakeholders to review it to flag issues requiring further bilateral discussions as a part of the plenary meeting. The purpose of this second round of bilateral consultations is to resolve outstanding issues and finalise the report for the presentation and adoption at the ACN plenary. These bilateral consultations will involve the country delegation, non-governmental stakeholders present at the plenary meeting, monitoring team, and may involve the IAP Chair. Discussions will be limited to the flagged issues; thus, the National Coordinator and other stakeholders will be requested to inform the Secretariat about these issues in advance, in line with the country monitoring schedule. To ensure that all outstanding issues are addressed within the allocated time, National Coordinators will be invited to prioritise issues and engage in constructive discussions aimed at finding consensus.

Plenary meeting to adopt monitoring reports

Draft reports will be presented for discussion and adoption at the ACN plenary meetings. The discussion and the adoption of the reports will include a plenary reading of the report to review outstanding issues and adopt the reports. The monitoring meeting participants will include the Steering Group members, country delegations, civil society and monitoring experts and other main stakeholders. The reports will be adopted by the plenary meeting on the basis of the consensus of the ACN countries.

The 5th round monitoring reports

The 5th round of monitoring will use performance indicators¹³ for the peer review. These indicators evaluate anti-corruption policy, prevention of corruption and criminal liability for corruption, with a focus on practical application and enforcement, and high-level corruption, in line with the scope of the 5th round of monitoring as defined by the Steering Group. The normative framework for the assessment is a set of narrowly defined benchmarks derived from international standards and good practices considering the stocktake of the previous four rounds of monitoring with achievements and remaining challenges in the region. This normative framework codifies the IAP monitoring practice since its launch and reflects recommendations in the summary report for the 4th round of monitoring.¹⁴

As the previous rounds of IAP monitoring have thoroughly assessed relevant legal frameworks, the 5th round targets practical enforcement and only focuses on legal frameworks in the areas where the countries of the region significantly lag behind in reaching the standards.

The assessment framework does not aim to cover each performance area exhaustively. The following considerations guided the selection of benchmarks:

- Relevance to the achievements and remaining challenges specific to the ACN region;
- Shifting focus on enforcement and practice from legal and institutional frameworks;
- Limitations related to the availability of administrative data and other available data sources;
- Encouraging countries to advance their performance in line with international standards and good practice;
- Ensuring objectivity of the assessment process by using uniform benchmarks.

To ensure recognition of progress at a granular level, as well as increase objectivity and consistency of the reviews, benchmarks are broken down into elements. The framework sets targets for countries for the next four years until the completion of the 5th round of IAP monitoring in 2026.

All the requirements for compliance with the benchmarks are spelled out in the benchmarks themselves. The Secretariat prepares a practical guide to further explain the meaning of benchmarks and serve as a reference document for monitoring experts, national coordinators, and other relevant stakeholders in the process of reviews.

Scoring and performance levels

To ensure higher objectivity and consistency of reviews, the 5th round of IAP monitoring will use an indicator-based scoring system. Performance levels will be calculated for each Performance

¹³ The ACN developed these indicators through inclusive consultations, tested them in a pilot and revised them based on written comments, as well as the work of the 10 Thematic Working Groups comprising representatives of the ACN countries and partners, and thorough bilateral consultations with the IAP countries.

¹⁴ See findings and recommendations of the Summary Report "[Anti-Corruption Reforms in Eastern Europe and Central Asia, Achievements and Challenges, 2016-2019](#)".

Area (PA). A maximum possible score of a PA is 100 points. Within these 100 points, a performance level for the PA will be determined according to the following scale of performance:

Performance Level	A	B	C	D
	Outstanding	High	Average	Low
Points	76-100	51-75	26-50	<25

Points for each of the 9 Performance Areas (PAs) are calculated by aggregating scores of all benchmarks within that PA. There is no higher aggregation (i.e., scores for all 9 Performance Areas are not aggregated). Each benchmark and its elements (numbered as ABCD... in the benchmarks) are scored individually. This means that a country may be compliant with one element of the benchmark and get the relevant score, and not-compliant with another element of the same benchmark for which it gets no score. The granularity of scores is ensured by narrowly defined benchmarks that are split into smaller elements, to the extent possible.

Benchmarks are self-contained. This means that all requirements to meet the benchmark are set in the benchmarks themselves. The Guide is an additional supporting document for the monitoring team and the country to interpret and better understand the benchmarks.

The indicators have an equal weight within the PA. Every PA has 4 indicators. This means that a total point for an indicator is always 25 (100/4). Benchmarks have equal weight within an indicator, and, in most cases (see scoring method 1 below), elements have equal weight within a benchmark, as explained below.¹⁵ The exact maximum score of each benchmark depends on the overall number of benchmarks included in the indicator. To calculate the weight of a benchmark within an indicator, the total weight of the indicator (25 points) should be divided by the total number of benchmarks within that indicator. For example, in an indicator comprising five benchmarks, the maximum score of each benchmark is 5 points.

Benchmarks are scored by three different scoring methods, as illustrated below.

Scoring method 1

Scoring method 1 is used in the majority of benchmarks. Under this scoring method, if the benchmark has elements, its score is equally distributed among these elements. For example, if the benchmark (with a total weight of 6.25 points) has three elements, the maximum score of each of them is 2.08 points, as shown below.

Example of the scoring method 1: Performance Area 1 - Anti-Corruption Policy

Indicator	Benchmarks and elements	Score
4. Coordination, monitoring and evaluation of anti-corruption policy is ensured <i>Max. score per indicator = 25</i>	<i>Benchmarks 4.1.-4.3.</i>	<i>6.25 each</i>

¹⁵ This equal weighting method is equivalent to the OECD Indicators of [Product Market Regulation](#) (PMR). It is also implicitly equivalent to the [Public Integrity Indicators](#).

	4.4. Non-governmental stakeholders are engaged in the monitoring and evaluation:	6.25 max
	A. Non-governmental stakeholders are invited to regular coordination meetings where the monitoring of the progress of the policy implementation is discussed;	2.08
	B. A monitoring report reflects written contributions of non-governmental stakeholders;	2.08
	C. An evaluation report reflects an assessment of the policy implementation conducted by non-governmental stakeholders.	2.08

Scoring method 2

When elements in a benchmark reflect different levels of compliance (from a higher standard to a lower one), the score of the benchmark is adjusted so that it corresponds to the degree of compliance. In the example shown below, element A of this benchmark is scored higher (as 100% of the maximum score for this benchmark) because it is a preferable standard that countries should strive to achieve. Element B is an alternative and, in the case of compliance, is scored 70% of the maximum score for this benchmark.

Example of the scoring method 2: Performance Area 6 - Independence of Judiciary

Indicator	Benchmarks and elements	Score
1. Merit-based appointment of judges and their tenure is guaranteed in law and practice <i>Max. score per indicator = 25</i>	<i>Benchmark 1.1.:</i> Irremovability of judges is guaranteed: A. Judges are appointed until the legal retirement age (100% of the benchmark) OR	5 (100%)
	B. Clear criteria and transparent procedures for confirming in office following the initial (probationary) appointment of judges are set in the legislation and used in practice (70% of the benchmark)	3.5 (70%)
	<i>Benchmarks 1.2.-1.5.</i>	5 each

Scoring method 3

For one benchmark that assesses the implementation of anti-corruption policy based on government reports, the score reflects the percentage of implementation of the policy measures. For example, if 70% of the measures planned for the previous year were fully implemented, the country will receive 70% of the maximum score possible under this benchmark.

Example of the scoring method 3: Performance Area 1 - Anti-Corruption Policy

Indicator	Benchmarks and elements	Score
3. The anti-corruption policy is effectively implemented <i>Max. score per indicator = 25</i>	3.1 Measures planned for the previous year were fully implemented according to government reports. <i>Note: The country's score for this benchmark will equal the percentage of measures planned for the respective year that were fully implemented, according to the government reports (scoring method 3). For example, if 70% of the measures planned for the previous year were fully implemented, the country would receive 70% of the maximum score possible under this benchmark.</i>	12.5 max (100%) Country score: (70% of 12.5 = 8.75)

	<i>Benchmark 3.2</i>	12.5
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Assessment period and cut-off date

The assessment period for all reviews will be the calendar year (the period from 1 January to 31 December) preceding the monitoring year that is the year when the on-site visit is conducted. Information about the developments after this period, even if provided during the review, will be reflected in the subsequent reports. Thus, the cut-off date for new developments is 31 December of the year preceding the monitoring.

As regards laws, normative acts or other documents that require adoption in the monitored country, monitoring will only take into account those in force by 31 December of the monitored year. Benchmarks requiring the existence of continuous enforcement practice (for example, application of certain measures or sanctions) will be evaluated based on the previous calendar year too. For benchmarks that evaluate practice depending on whether a certain event happened (for example, the appointment of the Prosecutor General) if the event did not happen during the preceding year, the benchmark is “not applicable”, and will be deducted from the calculation, not affecting the total score under the Performance Area. Such cases are marked in the notes to the benchmarks.

The evaluation of benchmarks is based on a rigorous peer review process, including country and stakeholder questionnaires, on-site visits and desk research as described above. If the country did not provide materials that show compliance with the specific benchmark during the monitoring, and the relevant information is not available to the monitoring team from other sources, that benchmark will be considered as not met.

Structure of the reports

The reports will include nine chapters, one for each Performance Area (PA). The chapters will be divided into sections for each indicator. Each section will include minimum background information, as relevant; analysis of compliance with benchmarks and its elements, as relevant; with reference to sources and evidence obtained in the process of monitoring, including from non-governmental sources of information; conclusions of the monitoring team. The text of the analysis will be concise, and to the point, it will not reflect or refer to information and arguments provided by the country or stakeholders in full, instead it will summarise the main points. The report will also include a summary table with information about compliance with benchmarks and scores under each indicator and PA.

In addition, each chapter will include a section analysing the opinion of the non-governmental stakeholders about the country’s performance under the respective performance area. To prepare this analysis, the monitoring team will use the existing information (including public reports or statements by NGOs and international organisations, existing surveys) and information obtained from stakeholders during the monitoring process through the questionnaire and on-site meetings. The review of the opinion of the non-governmental stakeholders will complement the monitoring team’s analysis of the country’s performance and will not be scored separately.

Model outline of a monitoring report

Introduction and monitoring process

Executive Summary

Chapter 1 Anti-Corruption Policy

- Evidence-based and up-to-date anti-corruption policy
- Inclusive and transparent policy development
- Effective implementation
- Coordination, monitoring, and evaluation

Chapter 2 Conflict of Interests and Asset Declarations

- Effective legal framework for conflict of interests
- Enforcement of conflict of interests
- Broad, transparent, and digitised asset and interest disclosure
- Unbiased and effective verification and enforcement

Chapter 3 Protection of Whistleblowers

- Legal framework
- Effective protection mechanisms
- Dedicated agency
- Enforcement and routine application of protection mechanisms

Chapter 4 Business Integrity

- Risk management oversight
- Public disclosure of beneficial ownership, verification, and sanctions
- Dedicated institution to address complaints
- Integrity of SOEs

Chapter 5 Integrity in Public Procurement

- Comprehensive public procurement system
- Competitive public procurement system
- Sanctions for violations
- Transparency of public procurement

Chapter 6 Independence of Judiciary

- Merit-based judicial appointment and tenure
- Appointment of court presidents, judicial remuneration and budget
- Status, composition, mandate, and operation of the Judicial Council
- Judicial accountability

Chapter 7 Independence of Prosecution Service

- Appointment and dismissal of the Prosecutor General
- Appointment, promotion, and accountability of prosecutors
- Budget, remuneration and performance evaluation of prosecutors

- Status, composition, functions, and operation of the Prosecutorial Council

Chapter 8 Specialised Anti-Corruption Bodies

- Specialisation of investigators and prosecutors
- Specialisation in identification, tracing, management and return of illicit assets
- Appointment of heads of specialised investigative and prosecutorial bodies
- Powers and transparency of specialised investigators and prosecutors

Chapter 9 Enforcement of Corruption Offences

- Enforcement of liability for corruption offences
- Enforcement of liability of legal persons
- Enforcement of confiscation measures
- Detection and prosecution of high-level corruption

Publication of reports

The reports adopted by the ACN plenary meeting will be considered final. After linguistic editing and technical corrections, the Secretariat will publish the reports with a press release on the ACN website in line with the OECD rules, including on data protection.

The Secretariat will send an official letter with a copy of the report to the Prime Minister/President/Parliament and the National Coordinator of the monitored country and will invite them to further disseminate the report. The National Coordinators are encouraged to translate the report into the national language, publish it as soon as possible on a governmental website(s), disseminate it to each responsible authority and take steps to promote its implementation.

Role of National Coordinator

The National Coordinator of the monitored country is responsible for ensuring the monitoring process at the national level. The National Coordinator must ensure the coordination with all relevant institutions involved to prepare them for the monitoring and delivery of answers to the questionnaire and additional information on time and with high quality. In particular, the duties of the National Coordinator related to monitoring include:

- Collection of replies to the monitoring questionnaire from national authorities, preparing a consolidated version and their submission to the ACN Secretariat;
- Preparation and carrying out of on-site visit;
- Coordination of the review of a draft report by all relevant authorities (collecting feedback from national authorities, preparing a consolidated version of comments to draft monitoring report, sending comments to the ACN Secretariat);
- Ensuring participation of the national delegation at the plenary meeting;

- Organising translation of the report into the national language and its publication.

To support more effective implementation of the ACN Work Programme and to help the National Coordinators in implementing their functions, countries will be encouraged to create coordination mechanisms or procedures that will involve representatives of public institutions responsible for areas covered by monitoring which are not in the exclusive competences of the agency acting as a National Coordinator. Such mechanisms or procedures would be particularly important to help the National Coordinator in organising the monitoring activities, including the responses to the questionnaire, the on-site visit, review, and negotiation of the draft and ensuring its implementation after the adoption.

Considering the focus of the 5th round of monitoring on implementation and practice, administrative or judicial statistics are important sources for the review. The IAP countries are invited to introduce relevant standard statistical variables in their annual data collection systems to ensure regular collection and automatic annual availability of data for variables used in the monitoring.

Role of the IAP Chair

The IAP Chair and Vice-Chair provides overall strategic leadership and support in delivering key decisions and is supported by the Vice-Chair. The main responsibilities of the IAP Chair include:¹⁶

- Leading discussions during the ACN plenary meetings, supporting the ACN in conducting peer review work inter alia by promoting open and constructive discussions and facilitating the adoption of monitoring reports. The IAP Chair may join a monitoring team of a particular country at the on-site or bilateral discussions as needed;
- Participating in high-level events and meetings, and otherwise representing the ACN in relevant international settings;
- Facilitating effective working relationships and engaging with member countries, development partners and other relevant organisations;
- Communicating and consulting with the ACN Secretariat regularly and otherwise supporting the ACN in effectively implementing its Work Programme.

Role of Non-Governmental Stakeholders

The IAP has been known for its engagement with non-governmental stakeholders (local and international NGOs, international organisations, private sector companies, and business associations, experts, academics). The external evaluation report of the ACN considered CSO

¹⁶ The Vice-Chair will be responsible for supporting the IAP Chair and conducting other functions delegated by the IAP Chair. The functions, roles and responsibilities of the Chair and Vice-Chair will be spelled out in more detail, in other documents, as relevant.

inclusion in the IAP exemplary, stating that the IAP process is widely recognised as a monitoring mechanism that excels in fostering civil society participation.¹⁷

Inclusive participation of non-governmental stakeholders will continue to be promoted and further enhanced in the 5th round of monitoring. The ACN Secretariat will solicit contributions from non-governmental stakeholders at various stages of review through their written or oral inputs, reviewing their alternative reports, research, analysis, and any other available inputs.

For each monitored country, the ACN Secretariat will update the list of stakeholders building on its previous engagement but also requesting the National Coordinator and relevant partner organisations (OGP, EU Delegations, other national and international partners) to provide relevant contacts. Subject to available resources, the ACN secretariat may organise information sessions and training for non-governmental stakeholders.

The ACN will send out a special questionnaire for non-governmental stakeholders to the mentioned list and will request to distribute it further to their relevant contacts. These replies to the monitoring questionnaire will be one of the sources for the monitoring.

The next important stage of monitoring involving non-governmental stakeholders is the on-site visit. The Secretariat will organise special panels with representatives of non-governmental stakeholders, including business and international partners engaged in anti-corruption and good governance activities in the country, inviting all relevant stakeholders it has identified and requesting its partners to forward the invite to other interested stakeholders. To ensure free exchange of information, the Government representatives will not be invited to attend these meetings. Anonymity of non-governmental stakeholders will be preserved throughout the whole process.

Inputs of non-governmental stakeholders will be reflected in the 5th Round of Monitoring reports in two ways. Firstly, the monitoring team will use non-governmental sources of information in the assessment of compliance with the benchmarks, along with other sources of monitoring. Secondly, each PA will include a section analysing the opinion of the non-governmental stakeholders about the country's performance under each PA. To prepare this analysis, the monitoring team will use the existing information (including public reports or statements by NGOs and international organisations, existing surveys) and information obtained from stakeholders during the monitoring process through the questionnaire and on-site meetings. The review of the opinion of the non-governmental stakeholders will complement the monitoring team's analysis of the country's performance and will not be scored separately.

Non-governmental organisations will be invited to provide their inputs after the on-site as additional information, a follow-up to special panels, as well as comments to the draft report produced by the monitoring team. Representatives that provided input will have an opportunity to take part in the bilateral discussions on the draft report, as well as its discussion at the ACN Plenary Meeting. After the publication of the adopted report, the role of non-governmental organisations will be key in disseminating it and using its findings for programming of activities, advocacy and holding government accountable to implementation reforms.

¹⁷ For more information - <https://www.oecd.org/corruption/acn/OECD-Anti-Corruption-Network-External-Evaluation-2019-ENG.pdf>.

Performance Indicators for the 5th Round of Monitoring

General Definitions

“Clear criteria, grounds, or procedures”: Criteria, grounds, or procedures are considered clear if, in the assessment of the monitoring team, they are not ambiguous and excessively broad to allow unlimited discretion of the decision-making body.

“Corruption offences”: Criminal offences mentioned in Chapter III of the United Nations Convention against Corruption, namely bribery of national public officials, bribery of foreign public officials and officials of international public organizations, embezzlement, misappropriation or other diversion of property by a public official, trading in influence, abuse of functions by a public official, illicit enrichment, bribery in the private sector, embezzlement of property in the private sector, laundering of proceeds of crime.

“Competitive procedures”: Procedures are considered competitive when vacancies are advertised online, and any eligible candidate can apply.

“Dedicated agency, unit, or staff”: An agency, a unit within the agency, or specialized staff that deals exclusively with certain function(s) and do not perform other duties.

“High-level corruption”: Corruption offences which meet one of the following criteria:

- A. Involve high-level officials in any capacity punishable by criminal law (for example, as masterminds, perpetrators, abettors, or accessories).
- B. Involve substantial benefits for officials, their family members, or other related persons (for example, legal persons they own or control, political parties they belong to).

A substantial benefit means a pecuniary benefit that is equal to or exceeds the amount of 1,000 monthly statutory minimum wages (or the equivalent of the minimum wage if it is not applicable) fixed in the respective country on 1 January of the year for which data is provided.

“High-level officials”: The following appointed or elected officials:

- A. The President, members of Parliament, members of Government and their deputies;
- B. Heads of central executive bodies and other central public authorities and their deputies, members of collegiate central public authorities, including independent market regulators and supervisory authorities;
- C. Head and members of the board of the national bank, supreme audit institution;
- D. Judges of general courts and the constitutional court, prosecutors, members of the highest judicial or prosecutorial governance bodies (for example, a judicial or prosecutorial council);
- E. Regional governors or heads of regional administrations, capital city mayor;
- F. Ambassadors and heads of diplomatic missions;
- G. Any other public officials explicitly designated as politically exposed persons by the national anti-money laundering legislation.

“Judicial governance body”: Judicial Council or another similar body that is set up by the Constitution or law, is institutionally independent from the executive and legislative branch of government, Chairperson of the Supreme Court, and court administration, has a mandate defined by the law, and manages its own budget.

“Law”: Primary law, not secondary legislation.

“Legislation”: Primary and secondary legislation.

“Non-governmental stakeholders”: Local and international NGOs, international organisations, private sector companies, and business associations, experts, academics.

“Policy/policy documents”: Anti-corruption strategy or action plan in force at the time of the monitoring. Other documents, even if they contain measures targeting corruption, will not be evaluated. If a country does not have a dedicated anti-corruption policy document and anti-corruption sections are included in other policy documents, the country will choose one document to be evaluated under PA 1.

“Prosecutorial governance body”: Prosecutorial Council or another body that is set up by the Constitution or law, is institutionally independent from the executive and legislative branch of government and not formally subordinated to the Prosecutor General, and has a mandate defined by the law. In this definition “not formally subordinated” means that the Prosecutor General or his/her deputies do not chair in the respective body, do not appoint, or dismiss its members, do not approve its decisions, or play a decisive role in its decision-making in another form, as well as have no authority to supervise or control its operation, and “mandate” means the authority to perform specific tasks.

“Routinely”: Applied or used systematically as a usual practice. The application or use is systematic when it includes at least 3 cases per year.

“Regular/regularly”: Taking place often or at uniform intervals. The benchmark may set specific intervals.

“Transparent procedures”: Procedures are considered transparent if the legislation regulates the main steps in the process and information about the outcomes of these steps is published online.

PERFORMANCE AREA 1: ANTI-CORRUPTION POLICY

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. The anti-corruption policy is evidence-based and up-to-date	1.1. The following evidence has been used for developing objectives and measures of the policy documents, as reflected in the policy documents or their supporting materials: <ul style="list-style-type: none"> A. Analysis of the implementation of the previous policy documents (if existed) or analysis of the corruption situation in the country; B. National or sectoral corruption risk assessments; C. Reports by state institutions, such as an anti-corruption agency, supreme audit institution, and law enforcement bodies; D. Research, analysis, or assessments by non-governmental stakeholders, including international organisations; E. General population, business, employee, expert, or other surveys; F. Administrative or judicial statistics. 	1
	1.2. The action plan is adopted or amended at least every three years.	1
	1.3. Policy documents include: <ul style="list-style-type: none"> A. Objectives, measures with implementation deadlines and responsible agencies; B. Outcome indicators; C. Impact indicators; D. Estimated budget; E. Source of funding. 	1
2. The anti-corruption policy development is inclusive and transparent	2.1. The following is published online: <ul style="list-style-type: none"> A. Drafts of policy documents; B. Adopted policy documents. 	1
	2.2. Public consultations are held on draft policy documents: <ul style="list-style-type: none"> A. With sufficient time for feedback (no less than two weeks after publication); B. Before adoption, the government provides an explanation regarding the comments that have not been included; C. An explanation of the comments that have not been included is published online. 	1

3. The anti-corruption policy is effectively implemented	<p>3.1. Measures planned for the previous year were fully implemented according to the government reports.</p> <p><i>Note: The country's score for this benchmark will equal the percentage of measures planned for the respective year that were fully implemented, according to the government reports (scoring method 3). For example, if 70% of the measures planned for the previous year were fully implemented, the country would receive 70% of the maximum score possible under this benchmark.</i></p>	3
4. Coordination, monitoring, and evaluation of anti-corruption policy is ensured	<p>3.2. Anti-corruption measures unimplemented due to the lack of funds do not exceed 10% of all measures planned for the reporting period.</p>	1
	<p>4.1. Coordination and monitoring functions are ensured:</p> <ul style="list-style-type: none"> A. Coordination and monitoring functions are assigned to dedicated staff (secretariat) at the central level by a normative act, and the staff is in place; B. The dedicated staff (secretariat) has powers to request and obtain information, to require participation in the convened coordination meetings, to require submission of the reports of implementation; C. Dedicated staff (secretariat) has resources necessary to conduct respective functions; D. Dedicated staff (secretariat) routinely provides implementing agencies with methodological guidance or practical advice to support policy implementation. 	1
	<p>4.2. Monitoring of policy implementation is ensured in practice:</p> <ul style="list-style-type: none"> A. A monitoring report is prepared once a year; B. A monitoring report is based on outcome indicators; C. A monitoring report includes information on the amount of funding spent to implement policy measures; D. A monitoring report is published online. 	1
	<p>4.3. Evaluation of the policy implementation is ensured in practice:</p> <ul style="list-style-type: none"> A. An evaluation report is prepared at least at the end of each policy cycle; B. An evaluation report is based on impact indicators; C. An evaluation report is published online. 	1
<p>4.4. Non-governmental stakeholders are engaged in the monitoring and evaluation:</p> <ul style="list-style-type: none"> A. Non-governmental stakeholders are invited to regular coordination meetings where the monitoring of the progress of the policy implementation is discussed; B. A monitoring report reflects written contributions of non-governmental stakeholders; C. An evaluation report reflects an assessment of the policy implementation conducted by non-governmental stakeholders. 	1	

PERFORMANCE AREA 2: CONFLICT OF INTERESTS AND ASSET DECLARATIONS

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. An effective legal framework for managing conflict of interest is in place	1.1. The legislation extends to and includes a definition of the following concepts applicable to public officials, in line with international standards: <ul style="list-style-type: none"> A. Actual and potential conflict of interest; B. Private interests that include any pecuniary and non-pecuniary advantage to the official, his or her family, close relatives, friends, other persons, or organisations with whom the official has personal, political, or other associations; C. An apparent conflict of interest. 	1
	1.2. The legislation assigns the following roles and responsibilities for preventing and managing ad hoc conflict of interest: <ul style="list-style-type: none"> A. Duty of an official to report COI that emerged or may emerge; B. Duty of an official to abstain from decision-making until the COI is resolved; C. Duties of the managers and dedicated bodies/units to resolve COI reported or detected through other means. 	1
	1.3. The legislation provides for the following methods of resolving ad hoc conflict of interest: <ul style="list-style-type: none"> A. Divestment or liquidation of the asset-related interest by the public official; B. Resignation of the public official from the conflicting private-capacity position or function, or removal of private interest in another way; C. Recusal of the public official from involvement in an affected decision-making process; D. Restriction of the affected public official's access to particular information; E. Transfer of the public official to duty in a non-conflicting position; F. Re-arrangement of the public official's duties and responsibilities; G. Performance of duties under external supervision; H. Resignation/dismissal of the public official from their public office. 	1
	1.4. The legislation provides for the following methods of resolving ad hoc conflict of interest:	1

	<ul style="list-style-type: none"> A. Specific methods for resolving conflict of interest in the collegiate (collective) state bodies; B. Specific methods for resolving conflict of interest for top officials who have no direct superiors. 	
	<p>1.5. There are special conflict of interest regulations or official guidelines for:</p> <ul style="list-style-type: none"> A. Judges; B. Prosecutors; C. Members of Parliament; D. Members of Government; E. Members of local and regional representative bodies (councils). 	1
2. Regulations on conflict of interest are properly enforced	<p>2.1. Sanctions are routinely imposed on public officials for the following violations:</p> <ul style="list-style-type: none"> A. Failure to report an ad hoc conflict of interest; B. Failure to resolve an ad hoc conflict of interest C. Violation of restrictions related to gifts or hospitality; D. Violation of incompatibilities; E. Violation of post-employment restrictions. 	1
	<p>2.2. Sanctions are routinely imposed on high-level officials for the following violations:</p> <ul style="list-style-type: none"> A. Violation of legislation on prevention and resolution of ad hoc conflict of interest; B. Violation of restrictions related to gifts or hospitality; C. Violation of incompatibilities; D. Violations related to requirements of divesting ownership rights in commercial entities or other business interests; E. Violation of post-employment restrictions. 	1
	<p>2.3. The following measures are routinely applied:</p> <ul style="list-style-type: none"> A. Invalidated decisions or contracts as a result of a violation of conflict-of-interest regulations; B. Confiscated illegal gifts or their value; C. Revoked employment or other contracts of former public officials concluded in violation of post-employment restrictions. 	1
3. Asset and interest declarations apply to high corruption risk public officials, have a broad scope and are transparent for the public and digitized	<p>3.1. The following officials are required to declare their assets and interests annually:</p> <ul style="list-style-type: none"> A. The President, members of Parliament, members of Government and their deputies, heads of central public authorities and their deputies; B. Members of collegiate central public authorities, including independent market regulators and supervisory authorities; C. Head and members of the board of the national bank, supreme audit institution; D. The staff of private offices of political officials (such as advisors and assistants); 	1

	<ul style="list-style-type: none"> E. Regional governors, mayors of cities; F. Judges of general courts, judges of the constitutional court, members of the judicial governance bodies; G. Prosecutors, members of the prosecutorial governance bodies; H. Top executives of SOEs. 	
	<p>3.2. The legislation or official guidelines require the disclosure in the declarations of the following items:</p> <ul style="list-style-type: none"> A. Immovable property, vehicles and other movable assets located domestically or abroad; B. Income, including its source; C. Gifts including in-kind gifts and payment for services and indicating the gift's source; D. Shares in companies, securities; E. Bank accounts; F. Cash inside and outside of financial institutions, personal loans given; G. Financial liabilities, including private loans; H. Outside employment or activity (paid or unpaid); I. Membership in organizations or their bodies. <p><i>Note: The disclosure of the above items may be conditional on reaching a certain value threshold.</i></p>	1
	<p>3.3. The legislation or official guidelines contain a definition and require the disclosure in the declarations of the following items:</p> <ul style="list-style-type: none"> A. Beneficial ownership (control) of companies, as understood in FATF standards, domestically and abroad (at least for all declarants mentioned in Benchmark 3.1.), including identification details of the company and the nature and extent of the beneficial interest held; B. Indirect control (beneficial ownership) of assets other than companies (at least for all declarants mentioned in Benchmark 3.1.), including details of the nominal owner of the respective asset, description of the asset, its value; C. Expenditures, including date and amount of the expenditure; D. Trusts to which a declarant or a family member has any relation, including the name and country of trust, identification details of the trust's settlor, trustees, and beneficiaries; E. Virtual assets (for example, cryptocurrencies), including the type and name of the virtual asset, the amount of relevant tokens (units) and the date of acquisition. <p><i>Note: The disclosure of the above items may be conditional on reaching a certain threshold.</i></p>	1

	3.4. The legislation or official guidelines require the disclosure in the declarations of information on assets, income, liabilities, and expenditures of family members, that is, at least spouse and persons who live in the same household and have a dependency relation with the declarant.	1
	3.5. Declarations are filed through an online platform.	1
	<p>3.6. Information from asset and interest declarations is open to the public:</p> <ul style="list-style-type: none"> A. Information from asset and interest declarations is open to the public by default in line with legislation, and access is restricted only to narrowly defined information to the extent necessary to protect privacy and personal security; B. Information from asset and interest declarations is published online; C. Information from asset and interest declarations is published online in a machine-readable (open data) format; D. Information from asset declarations in a machine-readable (open data) is regularly updated. <p><i>Note: The benchmark does not concern special legal regulations (if exist) on the declarations filed by officials whose positions are classified, or which contain other classified information.</i></p>	1
	<p>3.7. Functionalities of the electronic declaration system include automated cross-checks with government databases, including the following sources:</p> <ul style="list-style-type: none"> A. Register of legal entities; B. Register of civil acts; C. Register of land titles; D. Register of vehicles; E. Tax database on individual and company income. 	1
4. There is unbiased and effective verification of declarations with enforcement of dissuasive sanctions	<p>4.1. Verification of asset and interest declarations is assigned to a dedicated agency, unit, or staff and is implemented in practice:</p> <ul style="list-style-type: none"> A. There is the specialized staff that deals exclusively with the verification of declarations and does not perform other duties (70%); OR B. Verification of declarations is assigned to a dedicated agency or a unit within an agency that has a clearly established mandate to verify declarations, is responsible only for such verification and not for other functions (100%). 	2
	<p>4.2. Verification of asset and interest declarations, according to legislation and practice, aims to detect:</p> <ul style="list-style-type: none"> A. Conflict of interest (ad hoc conflict of interest or other related situations, for example, illegal gifts, incompatibilities); 	1

	<ul style="list-style-type: none"> B. False or incomplete information; C. Illicit enrichment or unjustified variations of wealth. 	
	<p>4.3. A dedicated agency, unit, or staff dealing with the verification of declarations has the following powers clearly stipulated in the legislation and routinely used in practice:</p> <ul style="list-style-type: none"> A. Request and obtain information, including confidential and restricted information, from private individuals and entities, public authorities; B. Have access to registers and databases which are held/administered by domestic public authorities and are necessary for the verification; C. Access information held by the banking and other financial institutions: with a prior judicial approval (50%) or without such an approval (100%); D. Have access to available foreign sources of information, including after paying a fee if needed; E. Commissioning or conducting an evaluation of an asset's value; F. Providing ad hoc or general clarifications to declarants on asset and interest declarations. 	<p>1</p> <p>2</p>
	<p>4.4. The following declarations are routinely verified in practice:</p> <ul style="list-style-type: none"> A. Declarations of persons holding high-risk positions or functions; B. Based on external complaints and notifications (including citizens and media reports); C. <i>Ex officio</i> based on irregularities detected through various, including open, sources; D. Based on risk analysis of declarations, including based on cross-checks with the previous declarations. 	1
	<p>4.5. The following measures are routinely applied:</p> <ul style="list-style-type: none"> A. Cases of possible conflict of interest violations (such as violations of rules on ad hoc conflict of interest, incompatibilities, gifts, divestment of corporate ownership rights, post-employment restrictions) detected based on the verification of declarations and referred for follow-up to the respective authority or unit; B. Cases of possible illicit enrichment or unjustified assets detected based on the verification of declarations and referred for follow-up to the respective authority or unit; C. Cases of violations detected following verification of declarations based on media or citizen reports and referred for follow-up to the respective authority or unit. 	1
	<p>4.6. The following sanctions are routinely imposed for false or incomplete information in declarations:</p> <ul style="list-style-type: none"> A. Administrative sanctions for false or incomplete information in declarations; B. Criminal sanctions for intentionally false or incomplete information in declarations in cases of significant amount as defined in the national legislation; 	1

	C. Administrative or criminal sanctions on high-level officials for false or incomplete information in declarations.	
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PERFORMANCE AREA 3: PROTECTION OF WHISTLEBLOWERS

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. The whistleblower's protection is guaranteed in law	<p>1.1. The law guarantees the protection of whistleblowers:</p> <ul style="list-style-type: none"> A. Individuals who report corruption related wrongdoing at their workplace that they believed true at the time of reporting; B. Motive of a whistleblower or that they make a report in good faith are not preconditions to receiving protection; C. If a public interest test is required to qualify for protection, corruption-related wrongdoing are considered to be in public interest, and their reporting qualifies for protection by default. <p><i>Note: Corruption related wrongdoing means that the material scope of the law should extend to: 1) corruption offences (see definition in the introductory part of this guide); and 2) violation of the rules on conflict of interest, asset and interest declarations, incompatibility, gifts, other anti-corruption restrictions. At their workplace means that a report is made based on information acquired through a person's current or past work activities in the public or private sector. As such, citizen appeals are not covered.</i></p>	1
	<p>1.2. Whistleblower legislation extends to the following persons who report corruption-related wrongdoing at their workplace:</p> <ul style="list-style-type: none"> A. Public sector employees; B. Private sector employees; C. Board members and employees of state owned enterprises. <p><i>Note: Whistleblower legislation means all legal provisions defining whistleblowing, reporting</i></p>	1

	<i>procedures and protections provided to whistleblowers.</i>	
	1.3. Persons employed in the defence and security sectors who report corruption-related wrongdoing benefit from equivalent protections as other whistleblowers.	1
	1.4. In administrative or judicial proceedings involving the protection of rights of whistleblowers, the law regulating respective procedure puts on the employer the burden of proof that any measures taken against a whistleblower were not connected to the report.	1
	1.5. The law provides for the following key whistleblower protection measures: A. Protection of whistleblower's identity; B. Protection of personal safety; C. Release from liability linked with the report; D. Protection from all forms of retaliation at the workplace (direct or indirect, through action or omission).	1
	1.6. The law provides for the following additional whistleblower protection measures: A. Consultation on protection; B. State legal aid; C. Compensation; D. Reinstatement.	1
2. Effective mechanisms are in place to ensure that whistleblower protection is applied in practice	2.1. The following reporting channels are provided in law and available in practice: A. Internal at the workplace in the public sector and state owned enterprises; B. External (to a specialized, regulatory, law enforcement or other relevant state body); C. Possibility of public disclosure (to media or self-disclosure e.g., on social media); D. The law provides that whistleblowers can choose whether to report internally or through external channels.	1
	2.2. There is a central electronic platform for filing whistleblower reports which is used in practice.	1
	2.3. Anonymous whistleblower reports: A. Can be examined; B. Whistleblowers who report anonymously may be granted protection when they are identified.	1
3. The dedicated agency for whistleblower protection has clear powers defined in law and is operational in	3.1. There is a dedicated agency, unit, or staff responsible for the whistleblower protection framework.	1
	3.2. A dedicated agency, unit or staff has the following key powers clearly stipulated in the legislation: A. Receive and investigate complaints about retaliation against whistleblowers;	1

practice	<ul style="list-style-type: none"> B. Receive and act on complaints about inadequate follow up to reports received through internal or external channels or violations of other requirements of whistleblower protection legislation; C. Monitor and evaluate the effectiveness of national whistleblower protection mechanisms through the collection of statistics on the use of reporting channels and the form of protection provided. 	
	<p>3.3. The dedicated agency, unit or staff has the following powers clearly stipulated in the legislation:</p> <ul style="list-style-type: none"> A. Order or initiate protective or remedial measures; B. Impose or initiate imposition of sanctions or application of other legal remedies against retaliation. 	1
	<p>3.4. The dedicated agency, unit, or staff responsible for the whistleblower protection framework functions in practice.</p>	1
4. The whistleblower protection system is operational, and protection is routinely provided	<p>4.1. Complaints of retaliation against whistleblowers are routinely investigated.</p>	1
	<p>4.2. Administrative or judicial complaints are routinely filed on behalf of whistleblowers.</p>	1
	<p>4.3. The following protections are routinely provided to whistleblowers:</p> <ul style="list-style-type: none"> A. State legal aid; B. Protection of personal safety; C. Consultations; D. Reinstatement; E. Compensation. 	1
	<p>4.4. There are no cases where breaches of confidentiality of a whistleblower's identity were not investigated and sanctioned.</p>	1

PERFORMANCE AREA 4: BUSINESS INTEGRITY

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. Boards of listed/publicly traded companies are responsible for oversight of risk management, including corruption risks	1.1. Corporate Governance Code (CGC) establishes the responsibility of boards of the companies listed in stock exchanges to oversee risk management: <ul style="list-style-type: none"> A. CGC or other related documents establish the responsibility of boards to oversee risk management; B. CGC or other related documents establish the responsibility of boards to oversee corruption risk management; C. CGC or other related documents which establish responsibility to oversee risk management are mandatory for listed companies. 	1
	1.2. Securities regulator or other relevant authorities monitor how listed companies comply with the CGC: <ul style="list-style-type: none"> A. The legislation identifies an authority responsible for monitoring the compliance of listed companies with the CGC; B. The monitoring is conducted in practice. 	1
2. Disclosure and publication of beneficial ownership information of all companies registered in the country, as well as verification of this information and sanctioning of violations of the relevant rules, is ensured	2.1. There is the mandatory disclosure of information about beneficial owners of registered companies: <ul style="list-style-type: none"> A. The country's legislation must include the definition of beneficial owner (ownership) of a legal entity which complies with the relevant international standard; B. The law requires companies to provide a state authority with up-to-date information about their beneficial owners, including at least the name of the beneficial owner, the month and year of birth of the beneficial owner, the country of residence and the nationality of the beneficial owner, the nature and extent of the beneficial interest held; C. Beneficial ownership information is collected in practice. 	1
	2.2. Public disclosure of beneficial ownership information is ensured in machine-readable (open data), searchable format and free of charge: <ul style="list-style-type: none"> A. Beneficial ownership information is made available to the general public through a centralized online register; B. Beneficial ownership information is published in a machine-readable (open data) and searchable format; 	1

	C. Beneficial ownership information is available to the general public free of charge.	
	2.3. Beneficial ownership information is verified routinely by public authorities.	1
	2.4. Sanctions are applied routinely, at least for the following violations of regulations on registration and disclosure of beneficial ownership: A. Failure to submit for registration or update information on beneficial owners; B. Submission of false information about beneficial owners.	1
3. There is a mechanism to address concerns of companies related to violation of their rights	3.1. There is a dedicated institution - an out-of-court mechanism to address complaints of companies related to violation of their rights by public authorities, which: A. Has the legal mandate to receive complaints from companies about violation of their rights by public authorities and to provide protection or help businesses to resolve their legitimate concerns; B. Has sufficient resources and powers to fulfil this mandate in practice; C. Analyses systemic problems and prepares policy recommendations to the government on improving the business climate and preventing corruption.	1
	3.2. The institution mentioned in Benchmark 3.1 publishes online at least annually reports on its activities, which include the following information: A. Number of complaints received, and the number of cases resolved in favour of the complainant; B. A number of policy recommendations issued, and the results of their consideration by the relevant authorities.	1
4. State ensures the integrity of governance structure and operations of state owned enterprises (SOEs)	4.1. Supervisory boards in the five largest SOEs: A. Are established through a transparent procedure based on merit, which involves online publication of vacancies and is open to all eligible candidates; B. Include a minimum of one-third of independent members.	1
	4.2. CEOs in the five largest SOEs: A. Are appointed through a transparent procedure which involves online publication of vacancies and is open to all eligible candidates; B. Are selected based on the assessment of their merits (experience, skills, integrity).	1
	4.3. The five largest SOEs have established the following anti-corruption mechanisms: A. A compliance programme that addresses SOE integrity and prevention of corruption; B. Risk-assessment covering corruption.	1
	4.4. In the five largest SOEs, the anti-corruption compliance programme includes the following: A. Rules on gifts and hospitality; B. Rules on prevention and management of conflict of interest;	1

	<ul style="list-style-type: none"> C. Charity donations, sponsorship, political contributions; D. Due diligence of business partners; E. Responsibilities within the company for oversight and implementation of the anti-corruption compliance programme. 	
	<p>4.5. The five largest SOEs disclose via their websites:</p> <ul style="list-style-type: none"> A. Financial and operating results; B. Material transactions with other entities; C. Amount of paid remuneration of individual board members and key executives; D. Information on the implementation of the anti-corruption compliance programme; E. Channels for whistleblowing and reporting anti-corruption violations. 	1

PERFORMANCE AREA 5: INTEGRITY IN PUBLIC PROCUREMENT

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. The public procurement system is comprehensive	1.1. Public procurement legislation covers the acquisition of works, goods and services concerning public interests by: A. Publicly owned enterprises, including SOEs and municipality owned enterprises; B. Utilities and natural monopolies; C. Non-classified area of the national security and defence sector.	1
	1.2. The legislation clearly defines specific, limited exemptions from the competitive procurement procedures.	1
	1.3. Public procurement procedures are open to foreign legal or natural persons.	1
2. The public procurement system is competitive	2.1. Direct (single-source) contracting represents: A. Less than 10% of the total procurement value of all public sector contracts (100%); B. Less than 20% of the total procurement value of all public sector contracts (70%); C. Less than 30% of the total procurement value of all public sector contracts (50%).	2
	2.2. The average number of proposals per call for tender is: A. More than 3 (100%); B. More than 2.5 (70%); C. More than 2 (50%); D. More than 1.5 (30%); E. Less than 1.5 (0%).	2
	2.3. The threshold value for goods contracts: A. Less than EUR 2,500 equivalent (100%); B. Less than EUR 5,000 equivalent (50%); C. Less than EUR 10,000 (30%); D. More than 10,000 (0%).	2
3. Dissuasive and proportionate sanctions are set by legislation and enforced for procurement related	3.1. Conflict of interest in public procurement is covered by legislation and applied in practice: A. There are explicit conflict of interest regulations established by law covering all public employees involved in the procurement cycle (from planning to contract completion stage); B. Sanctions are routinely imposed on public employees for violations of conflict of interest rules in public procurement;	1

violations	C. There are explicit conflict of interest regulations established by law covering all private sector actors involved in procurement.	
	3.2. Sanctions are routinely imposed for corruption offences in public procurement.	1
	3.3. The law requires to debar from the award of public sector contracts: A. All natural persons convicted for corruption offences; B. All legal persons and affiliates of legal persons sanctioned for corruption offences.	1
	3.4. Debarment of all legal and natural persons convicted for corruption offences from the award of public sector contracts is enforced in practice: A. At least one natural person convicted for corruption offences was debarred; B. At least one legal person or an affiliate of a legal person sanctioned for corruption offences was debarred.	1
4. Public procurement is transparent	4.1. An electronic procurement system, including all procurement methods: A. Is stipulated in public procurement legislation; B. Is accessible for all interested parties in practice.	1
	4.2. The following procurement stages are encompassed by an electronic procurement system in practice: A. Procurement plans; B. Procurement process up to contract award, including direct contracting; C. Lodging an appeal and receiving decisions; D. Contract administration, including contracts modification.	1
	4.3. The following up-to-date procurement data are publicly available online on a central procurement portal free of charge (except for nominal registration or subscription fee, where applicable): A. Procurement plans; B. Complete procurement documents; C. The results of evaluation, contract award decision and final contract price; D. Appeals and results of their review; E. Information on contract implementation.	1
	4.4. The following up-to-date procurement data are publicly available online on a central procurement portal free of charge (except for nominal registration or subscription fee, where applicable), in the machine-readable format: A. Procurement plans; B. Complete procurement documents; C. The results of evaluation, contract award decision and final contract price;	1

	D. Appeals and results of their review; E. Information on contract implementation.	
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PERFORMANCE AREA 6: INDEPENDENCE OF JUDICIARY

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. Merit-based appointment of judges and their tenure is guaranteed in law and practice	<p>1.1. Irremovability of judges is guaranteed: A. Judges are appointed until the legal retirement age (100%); OR B. Clear criteria and transparent procedures for confirming in office following the initial (probationary) appointment of judges are set in the legislation and used in practice (70%).</p> <p><i>Note: The country is compliant with one of the alternative elements A-B if the respective procedure applies to all judges. If different procedures apply to different categories of judges, the country's score is determined by the element with the lower number of points.</i></p>	2
	<p>1.2. A Judicial Council or another judicial governance body plays an important role in the appointment of judges, and the discretion of political bodies (if involved) is limited: A. The Judicial Council or another judicial governance body directly appoints judges. The role of Parliament or President (if involved at all) is limited to endorsing the Council's decision without the possibility to reject it (100%); OR B. The Judicial Council or another judicial governance body prepares a proposal on the appointment of a judge that is submitted to the Parliament or President that may reject it only in exceptional cases on clear grounds provided in the legislation and explained in the decision (70%); OR C. The Judicial Council or another judicial governance body reviews all candidates for judicial office and makes a justified recommendation to the relevant decision-making body (50%).</p>	2

	<p><i>Note: The country is compliant with one of the alternative elements A-C if the respective procedure applies to all judges. If different procedures apply to different categories of judges, the country's score is determined by the element with the lower number of points.</i></p>	
	<p>1.3. A Judicial Council or another judicial governance body plays an important role in the dismissal of judges, and the discretion of political bodies (if involved) is limited:</p> <p>A. The Judicial Council or another judicial governance body directly dismisses judges. The role of Parliament or President (if involved at all) is limited to endorsing the Council's decision without the possibility to reject it (100%);</p> <p>OR</p> <p>B. The Judicial Council or another judicial governance body prepares a proposal on the dismissal of a judge that is submitted to the Parliament or President that may reject it only in exceptional cases on clear grounds provided in the legislation and explained in the decision (70%);</p> <p>OR</p> <p>C. The Judicial Council or another judicial governance body reviews all proposals for dismissal of judges and makes a justified recommendation to the relevant decision-making body (50%).</p> <p><i>Note: The country is compliant with one of the alternative elements A-C if the respective procedure applies to all judges. If different procedures apply to different categories of judges, the country's score is determined by the element with the lower number of points.</i></p>	2
	<p>1.4. Judges are selected:</p> <p>A. Based on competitive procedures, that is when vacancies are advertised online, and any eligible candidate can apply;</p> <p>B. According to merits (experience, skills, integrity).</p>	1
	<p>1.5. Judges are promoted:</p> <p>A. Based on competitive procedures, that is when vacancies are advertised online, and any eligible candidate can apply;</p> <p>B. According to merits (experience, skills, integrity).</p>	1
2. Appointment of court presidents and judicial remuneration and budget do not affect judicial independence	<p>2.1. Court presidents are elected or appointed:</p> <p>A. By the judges of the respective court or by the Judicial Council or another judicial governance body;</p> <p>B. Based on an assessment of candidates' merits (experience, skills, integrity);</p> <p>C. In a competitive procedure.</p>	1

	<p>2.2. The budgetary funding allocated to the judiciary:</p> <p>A. Was not less than 90% of the amount requested by the judiciary or, if less than 90%, is considered sufficient by the judiciary;</p> <p>B. Included the possibility for the judicial representatives to participate in the consideration of the judicial budget in the parliament or the parliament's committee responsible for the budget.</p>	1
	<p>2.3. The level of judicial remuneration:</p> <p>A. Is fixed in the law;</p> <p>B. Excludes any discretionary payments.</p>	1
<p>3. Status, composition, mandate, and operation of the Judicial Council guarantee judicial independence and integrity</p>	<p>3.1. The Judicial Council and other judicial governance bodies are set up and function based on the Constitution and/or law that define their powers.</p>	1
	<p>3.2. The composition of the Judicial Council and other judicial governance bodies includes not less than half of the judges who:</p> <p>A. Are elected by their peers;</p> <p>B. Represent all levels of the judicial system.</p>	1
	<p>3.3. The composition of the Judicial Council and other judicial governance bodies includes at least 1/3 of non-judicial members with voting rights who represent the civil society or other non-governmental stakeholders (for example, academia, law professors, attorneys, human rights defenders, NGO representatives).</p>	1
	<p>3.4. Decisions of the Judicial Council and other judicial governance bodies:</p> <p>A. Are published online;</p> <p>B. Include an explanation of the reasons for taking a specific decision.</p>	1
<p>4. Judges are held accountable through impartial decision-making procedures</p>	<p>4.1. The law stipulates:</p> <p>A. Clear grounds for the disciplinary liability of judges that do not include such grounds as "breach of oath", "improper performance of duties", or "the loss of confidence or trust" unless the legislation breaks them down into more specific grounds;</p> <p>B. All main steps of the procedure for the disciplinary liability of judges.</p>	1
	<p>4.2. The disciplinary investigation of allegations against judges is separated from the decision-making in such cases.</p>	1
	<p>4.3. There are procedural guarantees of the due process for a judge in disciplinary proceedings, namely the right to be heard and produce evidence, the right to employ a defence, the right of judicial appeal, and these guarantees are enforceable in practice.</p>	1
	<p>4.4. There is no criminal or administrative punishment for judicial decisions (including for wrong decisions or miscarriage of justice), or such sanctions are not used in practice.</p>	1

PERFORMANCE AREA 7: INDEPENDENCE OF PUBLIC PROSECUTION SERVICE

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. Prosecutor General is appointed and dismissed transparently and on the objective grounds	1.1. A prosecutorial governance body or a committee, which is composed of non-political experts (e.g., civil society, academia, law professors, attorneys, human rights defenders), who are not public officials and are not subordinated to any public authorities, reviews the professional qualities and integrity of all candidates for the Prosecutor General and provides its assessment to the appointing body: <ul style="list-style-type: none"> A. The procedure is set in the legislation; B. The procedure was applied in practice. 	1
	1.2. The procedure for pre-term dismissal of the Prosecutor General is clear, transparent, and objective: <ul style="list-style-type: none"> A. Grounds for dismissal are defined in the law; B. Grounds for dismissal are clear and do not include such grounds as “breach of oath”, “improper performance of duties”, or “the loss of confidence or trust” unless the legislation breaks them down into more specific grounds; C. The law regulates the main steps of the procedure; D. The law requires information about the outcomes of different steps (if there are several steps) of the procedure to be published online. 	1
	1.3. There were no cases of dismissal of the Prosecutor General outside the procedure described in benchmark 1.2.	1
2. Appointment, promotion, and accountability of prosecutors are based on fair and clear mechanisms	2.1. All prosecutors (except for Deputies Prosecutor General) are selected based on competitive procedures and according to merits: <ul style="list-style-type: none"> A. All vacancies are advertised online; B. Any eligible candidate can apply; C. Prosecutors are selected according to merits (experience, skills, integrity). 	1
	2.2. All prosecutors (except for Deputies Prosecutor General) are promoted based on competitive procedures and according to merits:	1

	<p>A. Vacancies are advertised to all eligible candidates; B. Any eligible candidate can apply; C. Prosecutors are promoted according to merits (experience, skills, integrity).</p>	
	<p>2.3. Clear grounds and procedures for disciplinary liability and dismissal of prosecutors are stipulated: A. The law stipulates grounds for disciplinary liability and dismissal of prosecutors; B. Grounds for the disciplinary liability and dismissal are clear and do not include such grounds as “breach of oath”, “improper performance of duties”, or “the loss of confidence or trust” unless the legislation breaks them down into more specific grounds; C. The law regulates the main steps of the disciplinary procedure.</p>	1
	<p>2.4. The disciplinary investigation of allegations against prosecutors is separated from the decision-making in such cases.</p>	1
3. The budget of the public prosecution service, remuneration and performance evaluation of prosecutors guarantee their autonomy and independence	<p>3.1. The budgetary funding allocated to the prosecution service: A. Was not less than 90% of the amount requested by the prosecution service or, if less than 90%, is considered sufficient by the prosecution service; B. Included participation of representatives of the prosecution service in consideration of its budget in the parliament or the parliament’s committee responsible for the budget, if requested by the prosecution service.</p>	1
	<p>3.2. The law protects the level of remuneration of prosecutors and limits discretion: A. The law stipulates guarantees protecting the level of remuneration of prosecutors (70%); OR The level of remuneration is stipulated in the law (100%); B. If there are additional discretionary payments, they are assigned based on clear criteria</p>	2 1
	<p>3.3. Performance evaluation of prosecutors is carried out by: A. Prosecutorial bodies (70%); B. Prosecutorial Council or another prosecutorial governance body (100%).</p>	2
4. The status, composition, functions, and operation of the Prosecutorial Council guarantee the independence of the	<p>4.1. The Prosecutorial Council and other prosecutorial governance bodies function based on the Constitution and/or law that defines their powers.</p>	1
	<p>4.2. The majority of the Prosecutorial Council and other prosecutorial governance bodies is composed of prosecutors who: A. Are elected by their peers; B. Represent all levels of the public prosecution service.</p>	1

public service	prosecution	4.3. The composition of the Prosecutorial Council and other prosecutorial governance bodies includes at least 1/3 of non-prosecutorial members with voting rights who represent non-governmental stakeholders (e.g., civil society, academia, law professors, attorneys, human rights defenders).	1
		4.4. The decisions of the Prosecutorial Council and other prosecutorial governance bodies: A. Are published online; B. Include an explanation of the reasons for taking a specific decision.	1
		4.5. The Prosecutorial Council or other prosecutorial governance bodies play an important role in the appointment of prosecutors: A. The Prosecutorial Council or another prosecutorial governance body directly appoints prosecutors. The role of the Prosecutor General (if involved at all) is limited to endorsing the Council's decision without the possibility of rejecting it (100%); OR B. The Prosecutorial Council or another prosecutorial governance body prepares a proposal on the appointment of a prosecutor that is submitted to the Prosecutor General, that may reject it only in exceptional cases on clear grounds explained in the decision (70%); OR C. The Prosecutorial Council or another prosecutorial governance body reviews all candidates for the position of a prosecutor and makes a justified recommendation to the relevant decision-making body or official (50%). <i>Note: The country is compliant with one of the alternative elements A-C if the respective procedure applies to all prosecutors. If different procedures apply to different categories of prosecutors, the country's score is determined by the element with the lower number of points.</i>	2
		4.6. The Prosecutorial Council or other prosecutorial governance bodies play an important role in the discipline of prosecutors: A. The Prosecutorial Council or another prosecutorial governance body directly applies disciplinary measures or proposes disciplinary measures to the relevant decision-making official that can be rejected only in exceptional cases on clear grounds explained in the decision; B. If the Prosecutor General is a member of the Prosecutorial Council or other prosecutorial governance bodies dealing with disciplinary proceedings, he or she does not participate in decision-making on the discipline of individual prosecutors.	1

PERFORMANCE AREA 8: SPECIALISED ANTI-CORRUPTION INSTITUTIONS

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. The anti-corruption specialisation of investigators and prosecutors is ensured	<p>1.1. Investigation of corruption offences is assigned in the legislation to a body, unit or a group of investigators which specialise in combatting corruption:</p> <p style="margin-left: 20px;">A. There are investigators with a clearly established mandate and responsibility to investigate corruption offences as the main focus of activity (70%);</p> <p style="margin-left: 40px;">OR</p> <p style="margin-left: 20px;">B. There is a body or unit of investigators with a clearly established mandate and responsibility to investigate corruption offences as the main focus of activity (100%).</p> <p><i>Note: The main focus of activity means that the specialized investigators, body, or unit predominantly and primarily deal with the investigation of corruption offences but may also investigate other related crimes, namely crimes which are close in their nature to corruption (for example, misuse of state budget) or are investigated together with corruption offence (for example, forgery in office, fraud, participation in an organized criminal group).</i></p>	2
	<p>1.2. Jurisdiction of the anti-corruption body, unit, or a group of investigators specified in 1.1, is protected by legislation and observed in practice:</p> <p style="margin-left: 20px;">A. The legislation does not permit corruption cases to be removed from the specialised anti-corruption body, unit, investigator, or allows it only exceptionally, based on clear grounds established in the legislation;</p> <p style="margin-left: 20px;">B. There were no cases of transfer of proceedings outside legally established grounds.</p>	1
	<p>1.3. Prosecution of corruption offences is conducted by a body, unit or a group of prosecutors which specialise in combatting corruption:</p> <p style="margin-left: 20px;">A. There is a body, unit, or a group of prosecutors with a clearly established mandate to supervise or lead the investigation of corruption cases as the main focus of activity;</p> <p style="margin-left: 20px;">B. There is a body, unit, or a group of prosecutors with a clearly established mandate to present corruption cases in court as the main focus of activity.</p>	1

	<i>Note: A similar approach to the “main focus” is used as in the note to 1.1.</i>	
2. The functions of identification, tracing, management and return of illicit assets are performed by specialised officials	2.1. A dedicated body, unit or group of specialised officials dealing with the identification, tracing and return of criminal proceeds, including from corruption (asset recovery practitioners), functions in practice.	1
	2.2. A dedicated body, unit or group of specialised officials dealing with the management of seized and confiscated assets in criminal cases, including corruption, functions in practice. <i>Note: Benchmarks 2.1 and 2.2: There is no requirement that the body, unit, or a group of specialised officials deal exclusively with corruption proceeds. If they deal with different kinds of criminal assets, including corruption assets, – the benchmarks 2.1 and 2.2 are met, as long as the body, unit or a group of specialised officials deal exclusively with function(s) described in 2.1 and 2.2, and do not perform other duties.</i>	1
3. The appointment of heads of the specialised anti-corruption investigative and prosecutorial bodies is transparent and merit-based, with their tenure in office protected by law	3.1. The head of the anti-corruption investigative body, unit, or group of investigators, which specialises in investigating corruption, is selected through the following selection procedure in practice: A. The legislation regulates the main steps in the process; B. The information about the outcomes of the main steps is published online; C. The vacancy is advertised online; D. The requirement to advertise the vacancy online is stipulated in the legislation; E. Any eligible candidates could apply; F. The selection is based on an assessment of candidates’ merits (experience, skills, integrity) in legislation and in practice. <i>Note: If the head of the specialised body, unit or group of investigators was not selected in the monitoring period, the benchmark will be considered as “not applicable”. If the selection procedure was not finalised at the time of the monitoring, it shall be evaluated in the monitoring cycle after its completion and the benchmark will be considered as “not applicable” until it is finalised.</i>	1
	3.2. The procedure for pre-term dismissal of the head of the anti-corruption investigative body, unit, or a group of investigators, which specialise in investigating corruption, is clear, transparent, and objective: A. Grounds for dismissal are defined in the law; B. Grounds for dismissal are clear and do not include such grounds as “breach of oath”, “improper performance of duties”, or “loss of confidence or trust” unless the legislation breaks them down into more specific grounds;	1

	<p>C. The law regulates the main steps of the procedure; D. The law requires that information about the outcomes of different steps (if there are several steps) of the procedure is published online.</p>	
	<p>3.3. There were no cases of dismissal of the head of the anti-corruption investigative body, unit, or a group of investigators outside of the procedure described in benchmark 3.2.</p> <p><i>Note: If the head of the specialised body, unit or group of investigators was not dismissed in the monitoring period, the benchmark will be considered as “not applicable”. If the dismissal procedure was not finalised at the time of the monitoring, it shall be evaluated in the monitoring cycle after its completion and the benchmark will be considered as “not applicable” until it is finalised.</i></p>	1
	<p>3.4. The head of the anti-corruption prosecutorial body or unit is selected through the following selection procedure:</p> <p>A. The legislation regulates the main steps in the process; B. The information about the outcomes of the main steps is published online; C. The vacancy is advertised online; D. The requirement to advertise the vacancy online is stipulated in the legislation; E. Any eligible candidates could apply; F. The selection is based on the assessment of candidates’ merits (experience, skills, integrity).</p> <p><i>Note: If the head of the specialised body, unit or group of prosecutors was not selected in the monitoring period, the benchmark will be considered as “not applicable”. If the selection procedure was not finalised at the time of the monitoring, it shall be evaluated in the monitoring cycle after its completion and the benchmark will be considered as “not applicable” until it is finalised.</i></p>	1
<p>4. The specialised anti-corruption investigative and prosecutorial bodies have adequate powers and work transparently</p>	<p>4.1. An anti-corruption investigative body, unit, or a group of investigators, which specialises in investigating corruption, has in legislation and practice:</p> <p>A. Powers to apply covert surveillance, intercept communications, and conduct undercover investigations; B. Powers to access tax, customs, and bank data – directly or through a court decision.</p> <p><i>Note: Powers to apply covert surveillance, intercept communications and conduct an undercover investigation can be performed by the dedicated body, unit, or a group of investigators directly or through (with the help of) other bodies.</i></p>	1

	<p>4.2. Detailed statistics related to the work of the anti-corruption investigators and prosecutors are published online at least annually, including:</p> <ul style="list-style-type: none">A. A number of registered criminal proceedings/opened cases of corruption offences;B. A number of persons whose cases were sent to court disaggregated by level and type of officials;C. A number of terminated investigations with grounds for termination. <p><i>Note: The ground for termination means the legal ground, such as due to running out of the statute of limitations, absence of elements of the crime, etc., but not the details of the cases.</i></p>	1
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PERFORMANCE AREA 9: ENFORCEMENT OF CORRUPTION OFFENCES

INDICATORS	BENCHMARKS WITH ELEMENTS	Scoring Method
1. Liability for corruption offences is enforced	1.1. Sanctions are routinely imposed for the following offences: A. Active bribery in the public sector; B. Passive bribery in the public sector; C. Active or passive bribery in the private sector; D. Offering or promising of a bribe, bribe solicitation or acceptance of an offer/promise of a bribe; E. Bribery with an intangible and non-pecuniary undue advantage; F. Trading in influence. <i>Note: Enforcement-related benchmarks of this Performance Area take into account the first instance court sentences/decisions.</i>	1
	1.2. Sanctions (measures) are routinely imposed for criminal illicit enrichment or non-criminal confiscation of unexplained wealth of public officials (unjustified assets).	1
	1.3. There is at least one case of the started investigation of foreign bribery offence.	1
	1.4. Sanctions are routinely imposed for the following offences: A. Money laundering with possible public sector corruption as a predicate offence; B. Money laundering sanctioned independently of the predicate offence.	1
	1.5. In all cases of conviction for a corruption offence, public officials are dismissed from the public office they held.	1
	1.6. There are safeguards against the abuse of special exemptions from active bribery or trading in influence offences: A. Any special exemption from active bribery or trading in influence offence is applied taking into account circumstances of the case (that is not applied automatically); B. The special exemption is applied on the condition that voluntary reporting is valid during a short period of time and before the law enforcement bodies become aware of the crime on their own;	1

	<p>C. The special exemption is not allowed when bribery is initiated by the bribe-giver; D. The special exemption requires active co-operation with the investigation or prosecution; E. The special exemption is not possible for bribery of foreign public officials; F. The special exemption is applied by the court, or there is judicial control over its application by the prosecutor.</p> <p><i>Note: These safeguards can be stipulated in the legislation or official guidelines that are followed in practice.</i></p>	
	<p>1.7. No case of corruption offence by a public official is terminated because of: A. The expiration of the statute of limitations; B. The expiration of time limits for investigation or prosecution.</p>	1
	<p>1.8. Enforcement statistics disaggregated by the type of corruption offence is annually published online, including information on: A. Number of cases opened; B. Number of cases sent to the court; C. Number of cases ended with a sentence (persons convicted); D. Types of punishments applied; E. Confiscation measures applied; F. Types and levels of officials sanctioned.</p>	1
	<p>1.9. Enforcement statistics on corruption offences is collected on the central level.</p>	1
<p>2. The liability of legal persons for corruption offences is provided in the law and enforced</p>	<p>2.1. The liability of legal persons for corruption offences is established in the law.</p> <p><i>Note: The liability of legal persons should be established at least for active bribery in the public and private sector, trafficking in influence (if criminalized in the country), and money laundering.</i></p>	1
	<p>2.2. The liability of legal persons for corruption offences is autonomous that is not restricted to cases where the natural person who perpetrated the offence is identified, prosecuted, or convicted.</p>	1
	<p>2.3. The law provides for proportionate and dissuasive monetary sanctions for corporate offences, including by taking into account the amount of the undue benefit paid as a bribe or received as proceeds.</p>	1
	<p>2.4. The law provides for non-monetary sanctions (measures) applicable to legal persons (for example, debarment from public procurement or revocation of a license).</p>	1
	<p>2.5. The legislation or official guidelines allow due diligence (compliance) defence to exempt legal persons from liability, mitigate, or defer sanctions considering the case circumstances.</p>	1
	<p>2.6. The following sanctions (measures) are routinely applied to legal persons for corruption offences:</p>	1

	<ul style="list-style-type: none"> A. Monetary sanctions; B. Confiscation of corruption proceeds; C. Non-monetary sanctions (for example, prohibition of certain activities). 	
3. Confiscation measures are enforced in corruption cases	3.1. Confiscation is routinely applied regarding: <ul style="list-style-type: none"> A. Instrumentalities of corruption offences; B. Proceeds of corruption offences. 	1
	3.2. Confiscation orders in at least 50% of corruption cases are fully executed.	1
	3.3. The following types of confiscation measures were applied at least once in corruption cases: <ul style="list-style-type: none"> A. Confiscation of derivative (indirect) proceeds of corruption; B. Confiscation of the instrumentalities and proceeds of corruption offences transferred to informed third parties; C. Confiscation of property the value of which corresponds to instrumentalities and proceeds of corruption offences (value-based confiscation); D. Confiscation of mixed proceeds of corruption offences and profits therefrom. 	1
	3.4. The following types of confiscation measures were applied at least once in corruption cases: <ul style="list-style-type: none"> A. Non-conviction based confiscation of instrumentalities and proceeds of corruption offences; B. Extended confiscation in criminal cases. 	1
	3.5. Measures are taken to ensure the return of corruption proceeds: <ul style="list-style-type: none"> A. The return of corruption proceeds from abroad happened at least once; B. The requests to confiscate corruption proceeds are routinely sent abroad. 	1
4. High-level corruption is actively detected and prosecuted	4.1. At least 50% of punishments for high-level corruption provided for imprisonment without conditional or another type of release. <i>Note: Only aggravated bribery offences punishable with imprisonment are taken into account.</i>	1
	4.2. Immunity of high-level officials from criminal investigation or prosecution of corruption offences: <ul style="list-style-type: none"> A. Is lifted without undue delay; B. Is lifted based on clear criteria; C. Is lifted using procedures regulated in detail in the legislation; D. Does not impede the investigation and prosecution of corruption offences in any other way. 	1
	4.3. No public allegation of high-level corruption was left not reviewed or investigated (50%), or decisions not to open or to discontinue an investigation were taken and explained to the public (50%).	1

Note 1: The monitoring team will provide to the Government the list of public allegations it has uncovered (if any), if such allegations were made during the calendar year preceding the year of the monitoring. The Government provides to the monitoring team detailed information on the initial review and investigation of each such case, including explanation of reasons to terminate or not to pursue the investigation. The Government also provides links to the publication of information on the outcomes of such review or investigation for each case. The said publication must happen before the submission of the country's replies to the monitoring questionnaire. The publication may exclude information that is harmful to the investigation of other cases.

Note 2: Public allegations mean allegations that are available in the public domain and are disseminated by reputable local or international mass media or sourced to a reputable local or international organization. The allegation should include verifiable statements of fact about specific persons and alleged violations. The monitoring team decides whether the mass media outlet or organization is considered reputable based on the feedback of the non-governmental and governmental stakeholders and including such factors as the period of operation, whether frequently cited by other stakeholders or mass media, a regular online publication of information about the organization's activity in the anti-corruption area, etc.

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