

Work Programme 2023-2026

This Work Programme 2023-2026 provides a **Strategic Framework** for the ACN activities, including the 5th round of the Istanbul Anti-Corruption Action Plan (IAP) monitoring, Law-Enforcement Network (LEN), Business Integrity Group (BIG) and country projects. It also provides an indicative schedule of events and deliverables. The substantive elements, the **Assessment Framework for the 5th Round of Monitoring of the IAP** and **Methodology for the Matrix of High-Level Corruption Cases**, are presented in separate documents under the umbrella of this Work Programme.

The supporting elements, such as the **Communications** and **Financing Plans** were prepared by the Secretariat after the agreement of the ACN Steering Group on the substantive elements; they are also presented as separate documents.

The Steering Group agreed this Strategic Framework at the meeting on 17 November 2022.

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Context

The **Anti-Corruption Network for Eastern Europe and Central Asia (ACN)** was established in 1998 to help the region^{1,2} implement international anticorruption standards combining regional and country capacity building with regular monitoring of progress.

The ACN is a regional outreach programme of the OECD Working Group on Bribery (WGB)³. It is served by the Anti-Corruption Division (ACD) of the OECD Directorate for Financial and Enterprise Affairs (DAF) as Secretariat.

The Steering Group is the governing body of the ACN, it agrees on the Work Programme, reviews its implementation, and guides the Secretariat on all related matters. The Steering Group is composed of the National Coordinators from all participating jurisdictions and Contact Points from partner organisations. The Steering Group makes decisions by consensus.

Upon the completion of the previous Work Programme for 2016-2019, the Secretariat commissioned the external evaluation of the ACN⁴ and prepared the summary report on the implementation of the previous Work Programme⁵. During its last physical meeting in 2019, the ACN Steering Group discussed the [outline](#) of the Work Programme for 2020-2024 including the main directions and schedule of activities⁶.

The ACN activities during 2020-2022 were disrupted by the COVID-19 pandemic and were reorganised as required by distant work mode. In this period, the ACN pursued the preparations for the new Work Programme, including the development of the Assessment Framework for the 5th round of monitoring of the Istanbul Anti-Corruption Action Plan (IAP) and its pilot; institutional strengthening of the Law-

¹ The ACN is open to all jurisdictions in Eastern Europe and Central Asia. Currently participating jurisdictions are Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Republic of North Macedonia, Georgia, Kazakhstan, Kosovo* (*This designation is without prejudice to positions on status, and is in line with United Nations Security Council Resolution 1244/99 and the Advisory Opinion of the International Court of Justice on Kosovo's declaration of independence), Kyrgyzstan, Latvia, Lithuania, Republic of Moldova, Mongolia, Montenegro, Romania, Serbia, Slovenia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan. OECD Members participate in the ACN as partners or donors. The ACN is open for participation by international organisations, such as the Council of Europe and its Group of States against Corruption (GRECO), the Organisation for Security and Cooperation in Europe (OSCE), the UN Office on Drugs and Crime (UNODC), and the UN Development Programme (UNDP), as well as multi-lateral development banks, including the EBRD, and the World Bank. The ACN also regularly invites non-governmental partners to its meetings and consults with them on all workstreams, including Transparency International and other non-governmental and business associations.

² In response to Russia's large-scale aggression against Ukraine, the OECD Council has decided to immediately suspend the participation of Russia and Belarus in OECD bodies; <https://www.oecd.org/countries/russia/statement-from-the-oecd-council-on-further-measures-in-response-to-russia-s-large-scale-aggression-against-ukraine.htm>. Russia and Belarus are not involved in the ACN activities since then.

³ The OECD Working Group on Bribery in International Business Transactions is made up of representatives from the Parties to the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the Anti-Bribery Convention); for information about the Working Group, please refer to the [OECD website](#).

⁴ OECD; [External Evaluation Report, OECD ACN Work Programme 2016-2019](#)

⁵ OECD; [Anti-corruption Reforms in Eastern Europe and Central Asia, Progress and Challenges, 2016-2019](#)

⁶ OECD; [External Evaluation Report, OECD ACN Work Programme 2020-2024](#)

Enforcement Network, the development of the methodology for the Matrix of High-Level Corruption Cases and the launch of the Thematic Study on High-Level Corruption; a second study on Business Integrity in the ACN region and the follow-up capacity building programme as well as the study on the Business Ombudsman Institutions; development of new country projects in Ukraine, Uzbekistan, and Kazakhstan.

The new proposed Work Programme 2023-2026 is based on the outline of 2019 and is built further on the activities implemented during 2020-2022 to respond to new realities in the region.

Objectives

The overall objective of the Work Programme for 2023-2026 **is to support the ACN countries in the implementation of evidence-based participatory anticorruption reforms, and enforcing anticorruption legislation in practice**, according to the international standards established by the UN Convention against Corruption, the Anti-Bribery Convention as well as other international and regional instruments and good practices.

To achieve this overall objective, the ACN will pursue the following specific objectives:

- **Strengthening the implementation of anti-corruption reforms through country peer reviews** in the framework of the 5th round of monitoring under the Istanbul Anti-Corruption Action Plan (IAP) by using innovative methodology that is based on performance indicators, streamlined scope, and increasing the regularity of monitoring.
- **Developing evidentiary basis for regional anti-corruption policy dialogue** by using key performance indicators for annual reports that will provide the basis for the discussion of the regional trends, good practices, challenges, and solutions at the Steering Group meetings.
- **Building regional capacity for investigation and prosecution of high-level corruption** through the ACN Law-Enforcement Network (LEN) of specialised anti-corruption law-enforcement practitioners, its annual meetings, thematic studies, and the innovative approach of Matrix of High-Level Corruption Cases.
- **Building regional capacity for promoting business integrity**, including in specific sectors including integrity in the education sector, through policy discussion and exchange of good practices in the framework of the ACN Business Integrity Group (BIG) meetings, regional studies and training seminars that will be organised on demand from countries and will be tailor-made to address specific BI issues.
- **Building in-country capacities for the implementation of anti-corruption reforms** through technical assistance in the areas of ACN competence on request from individual reform-oriented countries concerning reform of legislation, training and capacity building for anticorruption bodies, and other tailor-made analytical work and policy advice.
- **Taking stock of and communicating about anti-corruption reforms in the region** and setting new priorities by developing the ACN summary report and commissioning external evaluation upon the completion of the period of this Work Programme and presenting it for the discussion at a high-level meeting of anti-corruption decision-makers.

The **main principles** of the ACN activities that will guide this Work Programme will remain as follows:

- **Ownership by the participating countries** ensures the relevance of the ACN activities to their actual needs. This is achieved through agreement on the Work Programme by the Steering Group, regular consultations about annual work plans and direct participation of experts from the ACN countries in the implementation of the activities.

- **Openness and inclusiveness** ensure participation, active support, and engagement of all stakeholders in ACN activities. Participation of all stakeholders from both governments and non-governmental partners, including civil society and private sector representatives, representatives of international organisations and donors, is based on the 'open doors' principle. Their participation is encouraged in all ACN events, except for the meetings of the Law-Enforcement Network, where most sessions are open to law-enforcement practitioners only.
- **Guidance by the OECD** ensures the knowledge transfer, quality of policy analysis and advice, and access to OECD policy communities. The ACN Secretariat ensures knowledge transfer from the WGB by participating in all activities of the WGB, including the monitoring, especially of ACN countries, and by facilitating links with other OECD Committees and their Secretariats, including the Directorate for Financial and Enterprise Affairs, Public Governance Directorate, Global Relations and Cooperation Directorate, and others.

Activities

To achieve the above objectives, the ACN will implement the following activities and produce the following outputs:

1. Building evidentiary basis for effective anti-corruption policies

- 5th round of Istanbul Anti-Corruption Action Plan (IAP)
- Regional anti-corruption outlook
- Monitoring Plenary and Steering Group meetings

2. Strengthening the fight against corruption through law-enforcement

- Meetings of the Regional Law-Enforcement Network (LEN)
- Thematic study on high-level corruption
- Matrix of high-level corruption cases
- Communication platform

3. Promoting business integrity

- Annual meetings of the Business Integrity Group (BIG)
- Country capacity building programme
- Regional business integrity studies
- Stock taking of anti-corruption reforms in education

4. Country capacity building

- Country projects for Kazakhstan, Ukraine, Uzbekistan and others

5. Taking stock of regional anticorruption reforms

- Summary report on progress and challenges in fighting corruption in the ACN region
- External evaluation of the ACN
- High level meeting to take stock of the Work Programme implementation and to set priorities for future work

Building Evidentiary Basis for Effective Anti-corruption Policies

5th Round of the Istanbul Anti-Corruption Action Plan Monitoring

The Istanbul Anti-corruption Action Plan is the peer review programme of the ACN⁷. Its methodology derives from the working methods of the Working Group on Bribery, but its substantive scope is broader, covering a range of policy, preventive and law-enforcement measures against corruption that are relevant to the region. Since its launch, this programme has made an important impact on anti-corruption reforms in the region by encouraging countries to commit to ambitious actions and incentivising performance through continuous follow-up. The programme is also known for high standards of transparency and inclusion of non-governmental stakeholders, including civil society, business and the international community.

The ACN permanently strives to improve its peer review programme. To this effect, the Steering Group at its 23rd meeting in July 2018 recommended to streamline the scope of the monitoring, specify benchmarks for assessment, and improve the progress update procedure to make it a stronger pressure tool. As a result, at the end of the 4th round of monitoring in 2019, the Steering Group agreed to introduce major novelties for the 5th round, including the “performance indicators” to provide an objective, predictable and transparent framework for country monitoring. Otherwise, the 5th monitoring round will be based on the same key principles as in the previous rounds:

- Peer review – or mutual evaluation - and equal treatment of countries.
- Comprehensive scope that covers core directions of anti-corruption work, and the functions of anti-corruption bodies in the context of regional priorities.
- Main stages of the monitoring process will involve questionnaires, on-site visits, and plenary meetings with the participation of national delegations, civil society, business, international and other non-governmental partners.
- Agreement on country monitoring reports in the plenary.
- Publication of reports.

Following this guidance, the Secretariat developed an [Assessment Framework](#) for the 5th round of monitoring and presented it at the virtual meeting of the Steering Group in 2020. Given the novelty of the new methodology, and in order to test it in practice, the Steering Group decided to conduct a [pilot](#) for the 5th round of monitoring. The pilot involved five Eastern Partnership (EAP) countries, including Armenia,

⁷ Istanbul Action Plan involves ten ACN countries: Armenia, Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Mongolia, Tajikistan, Ukraine and Uzbekistan. The Action Plan was launched in 2003 at the ACN meeting in Istanbul; it involves regular monitoring of countries’ anticorruption reforms. The 4th round of monitoring was completed in 2019, and the pilot for the 5th round was completed in 2022. For more information about the Istanbul Action plan please refer to the [OECD website](#).

Azerbaijan, Georgia, Republic of Moldova, and Ukraine, and was completed in 2021. Based on the findings of the pilot, the ACN revised the Assessment Framework in 2022, presented as a separate document under the umbrella of this Work Programme⁸.

The monitoring of the 5th round will be conducted on a regular basis (annually or every other year, subject to available resources). Regular monitoring will ensure that countries' achievements are recognised without delay and that resources for the monitoring will be used in a targeted way. ACN **plenary meetings** will be organised once per year (including the Steering Group meetings that will be organised back-to-back).

Countries that took part in the pilot will start the 5th round in 2023⁹. The Central Asian countries – Kazakhstan, Kyrgyzstan, Mongolia, Tajikistan, and Uzbekistan – will start the 5th round one year later, where 2023 will be dedicated to targeted capacity building for these countries to match the experience of the pilot.

Regional Anti-Corruption Outlook

To improve the evidentiary basis for the regional policy dialogue in the framework of the ACN Steering Group, the Annual Activity reports of the Secretariat will be replaced by **Regional Anti-Corruption Outlook reports**. These reports will be based on key performance indicators (KPIs).

The purpose of the KPIs is to provide a standard framework for analysing anti-corruption trends in the ACN region. The KPIs will be developed based on the IAP monitoring indicators, considering other work on anti-corruption indicators conducted by the OECD, notably the public sector integrity indicators developed by the OECD Public Governance Directorate, indicators used by OECD/EU SIGMA programme (Support for Improvement in Governance and Management) in the region, business integrity indicators considered by the OECD Anti-Corruption Division and other partners.

KPIs will include the benchmarks where comparable quantitative and qualitative data can be obtained from the ACN governments. KPIs will be used for the preparation of the annual reports covering all ACN countries.

Data for the annual Regional Anti-Corruption Outlook reports will be collected through KPI-based questionnaires from the ACN countries (excluding IAP countries, if data can be taken from monitoring reports), and from open sources. The reports will aim to identify regional trends, achievements, and challenges regarding the anti-corruption efforts of the ACN governments. These reports will serve as an evidentiary basis for the regional policy dialogue. Non-governmental partners from all ACN countries will be invited to provide their inputs to these reports and to the policy dialogue at the Steering Group meetings.

The **Steering Group** will continue meetings back-to-back with the plenary meetings once per year. The policy dialogue sessions will replace the tour-de-table sessions that were organised during the Steering Group meetings under the previous Work Programme.

⁸ Istanbul Anti-Corruption Action Plan 5th Round of Monitoring [Assessment Framework](#) and [Guide](#).

⁹ In 2023, Georgia informed the OECD/ACN Secretariat that it would not participate in the 5th round of IAP monitoring. The Steering Group will be invited to discuss this situation.

Strengthening the fight against corruption through law-enforcement

Law Enforcement Network

The Law-Enforcement Network (LEN) is a sub-group of the ACN that brings together prosecutors, investigators and other law-enforcement practitioners dealing with corruption cases. LEN operates through annual meetings, where participants establish professional contacts and learn from each other about modern and effective methods of investigating and prosecuting corruption crimes. The meetings are open to law-enforcement practitioners only, the agenda focuses on presentations of real-life cases and working groups on hypothetical cases dedicated to a specific theme.

Throughout this Work Programme, the LEN will continue its annual meetings. In addition, LEN participants will be invited to take part in the activities of other regional LENs and the Global Law Enforcement Network against Transnational Bribery (GLEN) supported by the OECD Anti-Corruption Division, thus expanding the networking opportunities further.

Thematic study on high level corruption

To support the discussions at annual meetings, the Secretariat develops studies on the theme selected by the practitioners that examine current practices across the countries and formulate recommendations. During the LEN meeting in 2019 (the last physical meeting before the pandemic), participants agreed to address the theme of high-level corruption, in addition to such recurrent subjects as international cooperation, financial investigations, and other practical matters.

Thematic study on high level corruption may be produced in chapters and examine how high-level cases are detected, investigated and prosecuted in order to identify good practices and challenges and propose practical and other solutions to the practitioners.

In addition, the Secretariat will develop further already existing LEN methodology of a simulated real-life complex corruption case in the form of a training manual with several modules with the focus on novel and effective law-enforcement tools (such as “how to detect high-level corruption”, “how to build investigative strategy”, “how to conduct a financial investigation”, “how to ensure asset recovery”, etc.).

Matrix of high-level corruption cases

The LEN will also use a Matrix of High-Level Corruption Cases based on a methodology agreed by the Steering Group. The Matrix will serve as an analytical tool to support the development of the mentioned thematic studies and provide an evidentiary basis for the LEN discussions, capacity development of law enforcement agencies, and informed recommendations regarding possible ways to reach progress in the

fight against high-level corruption. The current methodology for the Matrix was discussed by the Steering Group in 2021 and will be further modified to comply with the OECD data protection rules.

Communication platform

The LEN will also explore the possibility of developing an **internet community** for its members that will serve as a single communication platform containing all LEN materials, legislation, and contacts databases.

Promoting Business Integrity

The ACN pioneered the business integrity work in the region starting with the first cross-country study “Business Integrity in Eastern Europe and Central Asia” and the first Business Integrity regional event in Kyiv, Ukraine in 2016.¹⁰ Together with the European Bank for Reconstruction and Development (EBRD), the United Nations Development Programme (UNDP), the Organisation for Security and Co-Operation in Europe (OSCE) and ACN countries, it organised a series of expert seminars to disseminate the findings of the study and good practices, and supported various business integrity initiatives, notably the Ukrainian Network for Integrity and Compliance (UNIC). During these activities, an informal group of business integrity practitioners in the ACN region emerged – the Business Integrity Group (BIG) - that includes representatives of business associations, companies and public institutions that take an active role in promoting business integrity and seek ways to exchange experiences, to learn about new best practices and to boost integrity work in their countries.

During the pandemic, the BIG activities were organised virtually. This included virtual BIG meetings and the preparation of the second cross-country study “Business Integrity in Eastern Europe and Central Asia”¹¹ that compared progress vis-a-vis the 2016 study and updated the policy recommendations accordingly.

Business Integrity Group

The future activities will aim to support and expand the Business Integrity Group (BIG). This shall be done through business integrity consultations, organised in the ACN countries. The consultations will be held virtually and in person. They will help identify good practices and business integrity champions in the national authorities responsible for promotion and enforcement of business integrity in ACN countries, the business community, including companies, business associations, collective actions, and alternative complaint mechanisms, such as business ombudsman offices. Business integrity consultations will be also organised with other partners in the international community to build partnerships and synergies and to invite them join the BIG.

The **BIG meetings will continue to be organised annually** to bring together business integrity champions in the ACN countries to exchange good practices and identify business integrity solutions adapted to the region. These meetings will take place in the framework of the OECD Business Integrity Roundtables organised by the Anti-Corruption Division that provide a global clearinghouse for the exchange of new emerging best practices or will be closely coordinated with these events¹². ACN will explore possibility to organise sub-regional meetings, and meetings gathering specific stakeholder groups for focused discussions on topics of relevance (e.g., a meeting of compliance officers from ACN countries

¹⁰ OECD; [Business Integrity in Eastern Europe and Central Asia](#)

¹¹ OECD; Study analyses, [Business integrity in Eastern Europe and Central Asia 2022](#)

¹² [OECD Business Integrity Roundtable – OCDE](#)

to discuss how to assess compliance programmes). Establishment of the Business Integrity Advisory Group to provide guidance and advice on business integrity work of ACN will also be explored.

Capacity Building Programme

In addition to these regional BIG meetings, the ACN together with the EBRD is preparing the second phase of the joint **capacity building** programme that will be provided to individual countries upon request. National Coordinators and partner organisations will be invited to identify their specific capacity building needs and provide in-country logistical support. In response, the ACN and the EBRD will develop and deliver a tailor-made training programme on a variety of subjects that are covered under their mandates. These will range from OECD anti-bribery standards, including 2021 Anti-Bribery Recommendation, standards regarding integrity in MNEs and SOEs, as well as other subjects required by the region, such as Business Ombudsmen institutions, integrity of SMEs, collective actions, sectoral BI initiatives, and other issues. Depending on the demand from the countries, and available resources, the ACN may be able to deliver around two different training activities per year.

Regional business integrity studies

ACN will continue strengthening the evidence-based policies in the area of business integrity. This will be achieved through several approaches. ACN will track progress on success of measures towards business integrity through **monitoring of performance areas on business integrity** in the countries participating in the Istanbul Action Plan and from the regional business integrity KPI as a part of the Regional Anti-Corruption Outlook reports. ACN will draw on the OECD work on measuring business integrity and assessing compliance programmes conducted by the Anti-Corruption Division under the **Business Integrity Roundtables**, business integrity work of **other regional initiatives of the Working Group on Bribery (WGB)**, as well as WGB's horizontal studies on issues related to business integrity and take-aways from **WGB annual consultations with the private sector** – in order to identify lessons learnt, innovation and good practices and to promote them in the region. ACN will also develop further analytical studies on emerging trends and business integrity solutions, such as the on-going **study on Business Ombudsman institutions**. Finally, the ACN will conduct **regional surveys** on Business Integrity, and towards the completion of the current Work Programme, will present the findings in the **third study “Business Integrity in Eastern Europe and Central Asia”** that will identify progress vis-à-vis the recent 2022 study and propose an updated set of regional recommendations.

Sector specific work and stock taking of anti-corruption reforms in education

As most ACN countries have introduced main anti-corruption legislation and established anti-corruption bodies (although many improvements are still necessary), the focus on anti-corruption reforms is shifting towards the 'real life' sectors and local level, where citizens interact with the state and where the impact of corruption on quality of life is most vivid.

The previous round of monitoring focused on sectoral issues covering education, customs, land management, SOEs, political corruption, and procurement. It demonstrated difficulties in applying general corruption prevention policies and enforcement measures to specific sectors. To help countries deal with these challenges, the ACN disseminated the INTES methodology that helps assessing corruption risk in the sector of education and conducted a seminar on sector-specific anti-corruption reforms focusing on the sectors of education, police and natural resource management, and the local level of governments.

Building on the work done to date, and taking into account countries' priorities, the ACN will take stock of anti-corruption efforts in education sector. It will organise a roundtable on integrity in education with the view to discuss developments since reports of the previous round of IAP monitoring and will develop summary conclusions on the relevance of this sector in the anti-corruption priorities of the ACN region. This shall also help inform selection of sectors for future work. Moving forward, the sectoral work may focus on one or several "real life" sectors that involves direct contact with citizens and the performance of which has an immediate impact on their lives such as education and/or others.

This sectoral work can take different forms – **exchange of experience and good practices** in different sectors (or in one selected sector) at policy-making and expert levels, developing benchmarks, elaboration of **methodologies** for integrity and corruption assessments and for the development of evidence based sectoral plans, **regional comparative review** of integrity and anti-corruption reforms in a selected sector.

Countries can take the lead on sectoral work stream, e.g., countries where education was reviewed during the monitoring, such as Armenia, Azerbaijan, and Kazakhstan (as well as Serbia and Ukraine where corruption in education was reviewed recently by other OECD divisions) can take the lead in this sector and host expert seminars on these issues. Work on other sectors can be initiated by the countries in case of relevance, interest, and availability of resources.

Country Capacity Building

Country projects are implemented by the ACN in addition to its regional activities. Through these projects, the ACN can provide tailor-made assistance to countries in areas where it has a comparative advantage and expertise. At the same time, these projects allow the ACN to develop knowledge products that are useful for the whole region. They also provide for the opportunity to test how reforms and anticorruption solutions recommended by ACN work in practice in individual country contexts.

As in the past, the ACN will offer the possibilities of country projects under the following conditions: 1) the project is initiated upon request from a country that is engaged in active anti-corruption reforms, 2) the subject of the project is within the ACN scope and expertise, and 3) funding is provided for the country project in addition to the ACN regional activities.

The ACN is preparing three country projects for 2023-2024, including for Kazakhstan, Uzbekistan, and Ukraine. The countries will be updated on these projects at the meetings of the ACN Steering Group and through the publication on the ACN web site.

Taking stock of regional anticorruption reforms

Summary Report

Towards the end of the Work Programme implementation, the Secretariat will prepare the final report that will summarise trends, progress, and challenges of anti-corruption reforms. It will also include new policy recommendations setting the benchmarks for the future anti-corruption work in the region. As previous ACN summary reports, it will contribute to building global knowledge about effective anti-corruption tools and new challenges, will underpin the commitment of countries in Eastern Europe and Central Asia to move their anti-corruption agenda further ahead and will inform the next ACN work programme.

External Evaluation

As in the past, the Secretariat will commit an external consultant to conduct an evaluation of strengths and weaknesses of the ACN as a regional anticorruption programme. This evaluation will be conducted towards the end of the Work Programme and will propose recommendations for future improvements. It might be possible to provide a more global context for this assessment and to compare ACN with some other regional programmes (where available).

High Level meeting

The High-Level meeting will be organised upon the completion of this Work Programme to take stock of the progress made and outstanding challenges, to consider future priorities and make commitments for the anti-corruption reforms in the region. The summary report will provide the basis for the policy debate at the High-Level regional meeting.

Indicative Schedule of Events and Deliverables

Table 1. Indicative Schedule of Events and Deliverables

	2023	2024	2025	2026
Istanbul Acton Plan	Reports for EAP countries (ARM, AZ, MD, UA) Training for Central Asian countries (KZ, KR, MN, UZ, TJ) Plenary meeting	Reports for Central Asian countries (KZ, KR, MN, UZ, TJ) Plenary meeting	Follow up reports for EAP countries ¹³ Plenary meeting	Follow up reports for Central Asian countries Plenary meeting
Regional outlook	KPIs Pilot Regional Outlook report Steering Group (SG) meeting	Regional Outlook report SG meeting	Regional Outlook report SG meeting	Regional Outlook report SG meeting
Law Enforcement	Annual LEN meeting Matrix testing High- Level Corruption study LEN communications platform	Annual LEN meeting Matrix updates Matrix HLC report LEN communications platform	Annual LEN meeting Matrix updates Matrix HLC report LEN communications platform	Annual LEN meeting Matrix updates Matrix HLC report LEN communications platform Illicit assets study
Business Integrity	Annual BIG meeting Business Integrity (BI) Good Practices Study BI survey Thematic roundtable on integrity in education	Annual BIG meeting Capacity building workshops Business Integrity Good Practices Study Business integrity survey	Annual BIG meeting Capacity building workshops Business integrity Study Business integrity survey	Annual BIG meeting Capacity building workshops Business Integrity Good Practices Study Business integrity survey
Country projects	Kazakhstan Ukraine	Kazakhstan Uzbekistan Ukraine	Kazakhstan Uzbekistan Ukraine	Ukraine
Taking stock				External Evaluation Summary report High-level meeting

¹³ The cost of reports currently uses the estimates of baseline report, that will be adjusted and reduced in line with the scope of the follow up reports to be decided by the Steering Group. Monitoring of Georgia is subject to further bilateral discussions with the countries and the discussion of the ACN Steering Group.

Note: Decision on Ukraine's participation, including the form and timelines, will be taken in consultation with the country due to the war.