



Montenegro  
The Government of Montenegro  
Ministry of Internal Affairs and Public Administration

**INNOVATED ACTION PLAN  
FOR  
IMPLEMENTATION OF  
THE PROGRAMME OF FIGHT AGAINST CORRUPTION AND ORGANIZED CRIME  
- 2008 - 2009 -**

Podgorica, May 2008

<b>Legal framework</b>	<p>The Government of Montenegro adopted at its session held on 28<sup>th</sup> July 2005 the <b>Programme of the fight against corruption and organized crime</b>, and on session held on 24 August 2006 the Government adopted <b>Action Plan for implementation of the Program of fight against corruption and organized crime</b>. <b>National Commission for monitoring of implementation of Action Plan for implementation of the Program of fight against corruption and organized crime</b> was established by the Decision of the Government of the Republic of Montenegro on 15 February 2007. <b>National Commission</b> adopted the <b>First Report on realization of measures from the AP on 10 July 2007 (for period September 2006-May 2007)</b>, and the <b>Second Report for the period September 2006-December 2007</b>.</p> <p><b>Proposal for innovation of the Action Plan ensued from the work of the National Commission</b>. By Decision passed by the Minister of the Internal Affairs and Public Administration, no 01 – 54/1/1, dating from 14 February 2008, <b>the Working Group for preparation of the amendments of the Action Plan for implementation of the Program of fight against corruption and organized crime was established</b>. All of the measures realized until now shall be separately gathered and put in the Annex of the innovated Action Plan, and the implementation period of the <b>Innovated Action Plan is prolonged until the end of 2009</b>.</p>
<b>Document description</b>	<p>The Innovated Action Plan renders operational the priorities established in the <b>Programme of the fight against corruption and organized crime</b>, recommendations of <b>the National Commission</b>, recommendations of the <b>international organizations and institutions</b>, and recommendations of the involved <b>institutions of Montenegro</b> which have as an element continuous monitoring in fight against corruption and organized crime, or represent still not realized measures from the Action Plan from 2006, in such a way that concrete measures and activities of line ministries, administration bodies and institutions competent for the prevention and suppression of corruption and organized crime are determined, and which did not exist until now.</p> <p>The Action plan determines goals, measures, bearers and deadlines, i.e. dynamics of obligation discharge, indicators for measuring success and possible risk factors.</p>
<b>Implementation period</b>	<p><b>2008-2009</b></p> <p>Having in mind that the Government of the Republic of Montenegro adopted the Program of fight against corruption and organized crime in July 2005, and that in meantime Montenegro became independent and internationally recognized state, member of the UN and of the Council of Europe, and having in mind that Montenegro signed the Stabilization and Association Agreement on 15 October 2007 with the EU, and in May 2008 prepared National Program for integration of Montenegro into the EU for period 2008-12, the general opinion is that it is necessary to adopt the innovated AP until June 2008, whose implementation would be monitored for the period 2008-2009, and it is necessary to prepare, <b>until the end of 2009, completely new proposal of the Program of fight against corruption and organized crime</b>, and in accordance with that, to adopt the <b>Action Plan for implementation of the new Program for period 2010-2012</b>.</p>
<b>Document Status</b>	Draft
<b>Version Date</b>	15 May 2008
<b>Beneficiaries</b>	Minister of Internal Affairs and Public Administration Members of the National Commission The Government of Montenegro

**INNOVATED ACTION PLAN (MATRIX) FOR IMPLEMENTATION OF THE PROGRAM OF FIGHT AGAINST CORRUPTION AND ORGANIZED CRIME**

NO	GOAL	MEASURE	COMPETENT INSTITUTION	DEADLINE (FOLLOWING THE ADOPTION OF THE AP)	INDICATORS OF THE SUCCESS	RISK FACTORS	SOURCE OF FINANCING		
							BUDGET		
<b>POLITICAL AND INTERNATIONAL OBLIGATION TO ACT</b>									
1	Building of horizontal and vertical networks and associations with the objective of joint action of political parties and leaders, agencies, public and civil society and other non-state actors	Monitoring implementation of the Resolution on the fight against corruption and organized crime through: 1. Amendments of the Rulebook on work aiming to widen competencies of the Committee 2. Adoption of the opinions and suggestions of the Committee 3. Delivering of the periodic reports based on the innovated Instruction on preparation of the reports on implementation of the Action Plan, and delivering of other analysis and reports relating the corruption and organized crime 2. Regular updating of the sub-web site of the National Commission at the Government's web site	MNE Parliamentary Committee for political system, judiciary, and administration, Committee for economy, finances, and budget  1. All competent bodies involved in implementation of the AP 3. Anti-Corruption Initiative Directorate (ACID)	Two times per year, following the report of the National Commission	- Amendments of the Rulebook on work aiming to widen competencies of the Committee - number of the invited NGOs at the thematic, extended Committee's sessions - Number of the adopted opinions and suggestions given by the Committee  1. Prepared Instruction, number of delivered reports in relation to the number of the competent bodies obliged to report 2. Number of the reports published at the web site in six-months period	No risk	-	Yes	-
2	Intensification of already initiated realization of general reforms of legal and financial system	Preparation of the proposal of the Criminal Code (especially in domain of introducing the institute of expanded seizure and confiscation of the proceeds of crime, defining of a crime committed in organized manner as a general institute of the criminal material law)  Adoption of the Criminal Code  Preparation of the proposal of the Criminal Procedure Code (introducing the institute of inverted proving burden)	Ministry of Justice  MNE Parliament Ministry of Justice	2009  2009 2008	Defined proposal of the Criminal Code following the public hearing and collected comments given by the international organizations, the Code in line with the European standards and international conventions, the Code envisages introducing of the institute of expanded seizure and confiscation of the proceeds of crime, defined crime committed in an organized manner as a general institute of the criminal material law  Adoption of the Code  Defined proposal of the Criminal Procedure Code following the public hearing and collected comments given by the international organizations, the Code in line with the European standards and international conventions, the Code envisages introducing of the institute of inverted proving burden  Adoption of the Code	No risk  No risk	-  -	-  -	-  -
		Adoption of the Criminal Procedure Code	MNE Parliament	2008	Adoption of the Code	No risk	-	-	-

	Adoption of the Law on Amendments of the Law on State Prosecutor	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Adoption of the proposal of the amendments of the Law on Identity Card, in regard to providing the police to use biometric data	Mol&PA	2008	Adoption of the proposal	No risk	-	-
	Adoption of the amendments of the Law on Identity Card	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Genetic Privacy	Ministry of Health	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Genetic Privacy	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Obtaining of Biologic Material	Ministry of Health	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Obtaining of Biologic Material	Ministry of Health	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on National DNA Register	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on National DNA Register	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Preventing Conflict of Interest in performing public functions, in accordance with the international standards and recommendations	Mol&PA in cooperation with the Commission for Determining Conflict of Interest	2008	Defined proposal Law, following the public hearing and collected comments given by the Council of Europe, European Commission, and civil society, the law in line with the European standards and international recommendations, underlining: 1. Harmonized definition of the public official with the provisions of the UN Convention against Corruption (Art 2 of the Convention) 2. Introduced efficient and proportional penalty regime, 3. Defined and prescribed sanctions for delivering incorrect data on property, and 4. Defined obligation of the Commission to, when necessary, check and determine whether the data on reported incomes and proper are true or not.	No risk	-	-

	Adoption of the Law on Preventing Conflict of Interest in performing public functions	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Protection of the persons reporting the corruption (whistleblowers)	Mol&PA, Anti-Corruption Initiative Directorate (ACID)	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Protection of the persons reporting the corruption (whistleblowers)	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Integrity in Public Sector (which will contain prevention of corruption, preparation of the integrity plans, rules on lobbying, conflict of interest, protection of whistleblowers)	Ministry of Finance in cooperation with the ACID	2009	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Integrity in Public Sector	MNE Parliament	2009	Adoption of the Law	No risk	-	-
	Adoption of the Law on Financing Political Parties	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Adoption of the Law on Financing Election Campaign for President of Montenegro, mayors, and presidents of municipalities	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on Electronic Communication, aiming to: 1. introduce obligation for telecommunication services providers to register all buyers of the telecommunication services /120/ 2. ensure direct links and connection with the databases of the telecommunication services providers; condition: adoption of the Law on Personal Data Protection /125-6/	Ministry of maritime, transport, and telecommunication	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-
	Adoption of the Law on Amendments of the Law on Electronic Communication	MNE Parliament	2008	Adoption of the Law	No risk	-	-
	Preparation of the proposal Law on internal financial control in public sector	Ministry of Finance	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-	-

	Adoption of the Law on internal financial control in public sector	MNE Parliament	2008	Adoption of the Law	No risk	-
	Preparation of the proposal Law on Personal Data Protection	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on Personal Data Protection	MNE Parliament	2008	Adoption of the Law	No risk	-
	Preparation of the proposal Law on taking care of temporarily and permanently ceased property	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on taking care of temporarily and permanently ceased property	MNE Parliament	2008	Adoption of the Law	No risk	-
	Preparation of the proposal Law on property relations	Ministry of Finance	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on property relations	MNE Parliament	2008	Adoption of the Law	No risk	-
	Determining competencies for preparation, and preparation of the proposal Law on State Election Commission	MNE Parliament in cooperation with the Secretariat for Legislation	2008	Determined competency for preparation of the Law, defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on State Election Commission	MNE Parliament	2008	Adoption of the Law	No risk	-
	Preparation of the proposal Law on obligatory relations	Ministry of Justice	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on obligatory relations	MNE Parliament	2008	Adoption of the Law	No risk	-
	Preparation of the proposal Law on Aliens	Mol&PA	2008	Defined proposal Law, following the public hearing and collected comments given by the international organizations, the law in line with the European standards and international conventions	No risk	-
	Adoption of the Law on Aliens	MNE Parliament	2008	Adoption of the Law	No risk	-

3	Implementation of international instruments and standards in field of fight against corruption and organized crime	Analyze degree of harmonization of the legislation with international standards in field of fight against corruption and organized crime	Anti-Corruption Initiative Directorate, Mol&PA, Ministry of Justice	Continuous	Reports on the level of harmonization of the legislation: number of the analyzed laws, and number and names of the conventions in relation to which the analysis was prepared, for every law individually, number of defined amended laws and number of the adopted amended laws	Lack of Human Resource Capacities	Yes	Yes
	Continue with the harmonization of legislation with the UN Conventions against corruption (Palermo, UNTOC Convention), and other conventions in field of fight against organized crime	To ratify Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no198)	Mol&PA, Ministry of Justice	2008, Continuous	Full harmonization of the legislative framework with the conventions in field of organized crime; number of the analyzed laws, and number and names of the conventions in relation to which the analysis was prepared, for every law individually, number of defined amended laws and number of the adopted amended laws	No risk	-	-
	To ratify Convention on Prevention of (CETS no196)	To ratify Convention on Prevention of (CETS no196)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
	To ratify Convention on Combating of Terrorism (CETS no 190)	To ratify Convention on Combating of Terrorism (CETS no 190)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
	To ratify Convention on Fight against Trafficking in Human Beings (CETS no 97)	To ratify Convention on Fight against Trafficking in Human Beings (CETS no 97)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
	To ratify the Convention on Cyber Crime, with supplementing Protocols (ETS189)	To ratify the Convention on Cyber Crime, with supplementing Protocols (ETS189)	MNE Parliament, MNE Government, Mol&PA	2008	Ratified Convention	No risk	-	-
4.	Cooperation and Exchange of information between the states, aiming to organize joint operations in fight against organized crime	Publishing of the ratified international agreements and conventions at the web site of the Government, the Parliament, and in Official Journal	The Government /MIFA MNE Parliament MNE Official Journal	Continuous	Published ratified agreements	No risk	Da	Da
	Preparation of the Annual plans for signing of bilateral agreements	Police Directorate, Customs Administration, Directorate for preventing money laundering and financing of terrorism	Until the end of III quarter of 2008, until the end of I quarter of 2009	Prepared Annual plans for signing of bilateral agreements: • with the neighboring countries • with the EU countries • with international organizations	No risk	-	-	-
	Signing of bilateral agreements: • with the neighboring countries • with the EU countries • with international organizations	Police Directorate, Customs Administration, Directorate for preventing money	Continuous	Number of signed bilateral agreements: • with the neighboring countries • with the EU countries • with international organizations	Non-harmonized legislation in countries in the region	-	-	-



			launders and financing of terrorism	Continuous	Indicators of the criminal prosecution: number of criminal claims, investigations, charges, and sentences in force, which resulted from international cooperation	No risk	-	-
	Reporting on the results of international cooperation in fight against corruption and organized crime	The Supreme Court, Supreme State Prosecutor's Office, Police Directorate, Customs Administration, Directorate for preventing money laundering and financing of terrorism	ACID (on basis of collected individual reports from the competent bodies)	Continuous	Assessment of the realized progress by RAI	Lack of human resources, Lack of budgetary and/or external resources	Yes	Yes
5.	Active participation in realization of measures and activities of Regional Anti-corruption Initiative (RAI)	Implementation of Declaration on ten joint measures for fight against corruption in South Eastern Europe	ACID (on basis of collected individual reports from the competent bodies)	Continuous	GRECO Report on Fulfillment of obligations and recommendations deriving from the GRECO Report on assessment of anti-corruption measures and activities in Montenegro, number of measures assessed by GRECO as implemented and realized, and number of measures that are not realized	No risk	Yes	Yes
6	Realization of the obligations deriving from the membership in the Council of Europe (GRECO)	Fulfillment of obligatory recommendations from GRECO Report on assessment of anti-corruption measures and activities in Montenegro	ACID, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Defined priorities, project proposals based on defined priorities	No risk	-	-
7.	Improvement of material conditions for the functioning of competent bodies	Defining priorities in field of fight against corruption and organized crime, drafting projects and candidate them for Budget financing, and by means of international organizations and institutions						



		Ensuring financial support from the Budget for the competent bodies for realization of candidate projects	ACID, Police Directorate, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Number of projects financed from the Budget relating to fight against corruption and organized crime, and total amount of ensured and provided means	Lack of budgetary means	Yes	-
		Ensuring financial support from the international organizations for the competent bodies for realization of candidate projects	ACID, Police Directorate, Customs Administration, Tax Administration, Commission for determining conflict of interest, Commission for controlling public procurement procedure, Supreme State Prosecutor's Office, Supreme Court, Police Academy, Directorate for preventing money laundering and financing of terrorism, Human Resources Management Agency	Continuous	Number of projects delivered to the foreign donors relating to fight against corruption and organized crime, and total amount of ensured and provided means by the foreign donors	Not accepting projects by foreign donors	-	Yes

**GENERAL OBJECTIVES**

**A. EFFICIENT CRIMINAL PROSECUTION AIMING TO COMBAT CORRUPTION AND ORGANIZED CRIME**

1.	Raising the level of knowledge and specialization of police, prosecutors and judges	Needs assessment for training of prosecutors, police, and judges	Police Directorate, Police Academy, Supreme State Prosecutor's Office, Supreme Court	2008	Identified need for training of prosecutors, judges, and police officers	Lack of budgetary and/or external means, quality of training project	Yes	Yes
----	---	--	--	------	--	--	-----	-----

		Organizing of joint seminars for representatives of police, prosecutor's office and courts, in relation to new provisions and solutions stipulated in Criminal Procedure Code	Center for education of bearers of judicial functions in cooperation with the Police Academy	2008-2009	Number of held seminars, number of participants from the police, prosecutor's office, courts	No risk	Yes	Yes
2.	Prevention of abuse in application of secret surveillance measures (SSM)	Court and prosecution control Parliamentary control (in accordance with the provisions of the Law on) Internal Police Control	Judicial Council, Supreme State Prosecutor's Office, Police Directorate	Continuous	Number of carried out controls, number of discovered eventual abuses	No risk	Yes	Yes
3	Efficient care of temporary and permanently confiscated property, as well as of the distribution of profit gained from the confiscated property (to judiciary, prosecution, police)	To establish separate independent body for confiscated property management	Ministry of Finance	2008	Established body; Prepared and delivered reports on status and level of condition and degree of preservation of the value of the property (confiscated, guarded, and returned); Relation in value between temporarily confiscated, permanently confiscated and returned property	No risk	-	-
4.	Assessment of the criminality state of play in field of criminal acts with elements of corruption and organized crime	1. preparation of the six-months analysis on statistical indicators in relation to number of cases in field of corruption and organized crime being processed before the courts or the ones with effective rulings, with special attention to the structure of perpetrators of such acts and sphere of society in which these acts 2. to prepare instructions for harmonization of methods of presenting statistical data by the police, prosecution, and courts, for publishing of these data at the web sites of the mentioned institutions	1. Supreme Court, Police Directorate, Supreme State Prosecutor's Office (Three-Party Commission) 2. Supreme Court, Police Directorate, Supreme State Prosecutor's Office (Three-Party Commission)	1. 2008, Continuous 2. 2008. 3. 2008. 4. 2009.	1. prepared periodical statistical indicators and analysis, delivered to the National Commission 2. harmonized methods of presenting statistical data by the police, prosecution, and courts, comparable statistical data, and also published at the web sites of the respective institutions 3. number of identified, characteristic emerging problems in relation to implementation in purpose of providing evidences and proving in pre-trial procedure, investigation, and main hearing, and which have impact on efficient criminal prosecution and effective rulings	No risk	-	-
5.	Strengthening of state bodies' capacities in fight against trafficking in human beings	Implementation of the Action Plan for fight against trafficking in human beings	Office of the national Coordinator for fight against trafficking in human beings, Police Directorate	2009 Continuous	Quarterly informing on realization of measures from the Action Plan Statistical data on number of investigations carried out, criminal claims submitted, and effective court rulings, convicting and acquitting, in field of trafficking in human beings	No risk	-	-

B. PREVENTION AND EDUCATION								
1.	Improvement of working conditions and general standard of judges, prosecutors, and the police	To provide special premises for acceptance of injured parties and witnesses	Judicial Council, Ministry of Finance, Courts	I quarter of 2009	Provided and special premises for acceptance of injured parties and witnesses	Lack of budgetary and/or external means	Yes	Yes
2.	Increase of the integrity of judges and prosecutors	Implementation of the Code of Ethics of judges and the Code of Ethics of prosecutors	Judicial Council, Prosecutor's Council	Continuous	Efficient implementation and initiation of disciplinary proceedings due to the violation of the Code of Ethics (number of disciplinary proceedings, number of decisions, number of dismissed judges/prosecutors)	No risk	-	-
		Efficient work of Office for reporting the corruption within the judiciary	Supreme Court	Continuous	Number of disciplinary and criminal proceedings initiated against the judges due to reports delivered to the Office	No risk	Yes	-
3.	Increase of the integrity of the police	Application of the Police Code of Ethics:	1, 2 Police Directorate (Committee on Ethics ) 3 Police Academy	Continuous	Six-month analysis prepared by the Committee on Ethics on application of Code of Ethics	No risk	-	-
		1) Efficient work of Committee on Ethics 2) Preparation of six-month analysis on application of Code of Ethics 3) Organizing of periodical trainings on application of Code of Ethics			Number of disciplinary proceedings initiated due to violation of the Police Code of Ethics, number of trainings and number of employees participating in trainings			
4.	Improvement of methods, manner of	Preparation of the Instructions on reporting the cases of corruption to police (manner of reporting and protection of whistle blowers), and its efficient implementation	Police Directorate	2008	Prepared Instructions, number of reported cases of corruption before and after promotion of the Instructions	No risk	Yes	Yes
		Training of police officers and employees for implementation of the Instructions on reporting corruption to the police	Police Directorate, Police Academy, ACID	2008, Continuous	Number of trainings and number of employees participating in trainings	Lack of budgetary and/or external means	Yes	Yes
		Promoting the Instructions on reporting corruption to the police	Police Directorate, ACID, NGO	2008, Continuous	Prepared plan of promotion of the Instructions, report on implementation of the plan, number of the realized activities in relation to the planned ones	No risk	Yes	Yes
		Six-months reporting on work of organizational unit for surveillance of Police Directorate work	Mol&PA	Continuous	Six-months reports	No risk	-	-
4.	Improvement of methods, manner of	Promotion of the Code of Ethics of public servants and state employees	Human Resources Management Agency	Continuous	Respecting the Code of Ethics	No risk	-	-
		Fulfilling the obligation for public office	Commission for	Continuous	Percentage of submitted reports on incomes and	Disregard of	-	-

	functioning and conducting of the legislative, executive and judicial authorities, as well as state prosecutors	holders to submit reports on their incomes and property conditions Monitoring the giving and receiving gifts by the officials and employees Updating and monitoring of the public register aimed at ensuring the transparency of financial and property conditions of public office holders	Determining the Conflict of Interest Commission for Determining the Conflict of Interest Commission for Determining the Conflict of Interest	Continuous Continuous	property Number and value of reported gifts Updated public register	the law and the procedure	
5.	Narrowing down the area for potential corruption in public sector	Preparation of the Action Plan for fight against corruption in field of health care and social protection Preparation of the Action Plan for fight against corruption in field of education Preparation of the Action Plan for fight against corruption in field of spatial planning	Ministry of health, labor and social welfare, ACID, in cooperation with the NGO Ministry of Education and Science, ACID, in cooperation with the NGO Ministry for Economic Development, ACID, in cooperation with the NGO	I quarter of 2009 I quarter of 2009 I quarter of 2009	Prepared Action Plan Prepared Action Plan Prepared Action Plan	No risk No risk No risk	- - -
6.	Efficient implementation of the Law on Financing Political Parties and the Law on election of the President of Montenegro, mayors, and presidents of municipalities	Organizing of the seminars for authorized persons from political parties and employees who have direct contact with finances Organizing of advising with the authorized persons in political parties aiming to share knowledge acquired at the international seminars Education of the citizens and NGOs on implementation of the Law on Financing Political Parties and the Law on election of the President of Montenegro, mayors, and presidents of municipalities Preparation of the Manual for members of State and Municipal election commissions and for authorized persons of political parties and employees who have direct contact with finances Preparation of database on financial reports submitted by political parties, available at the web site of the State Election Commission	State Election Commission and NGO State Election Commission NGOs State Election Commission and NGO	Continuous Continuous Continuous 2008 – 2009	Total number of seminars per institutions and fields, number of participants Total number of organized advisories, number of participants Number of NGOs that carry out education, prepared manual for citizens Prepared manual, number of distributed manuals Established database, number of published information and submitted reports at the web site	Lack of budgetary and/or external means No risk Lack of budgetary and/or external means Lack of budgetary and/or external means No risk	Yes Yes Yes Yes -

	Preparation of database with the reports on spent means by the State Election Commission, available at the web site of the State Election Commission	State Election Commission	2008, Continuous	Established database, published report	No risk	Yes	-
7.	Efficient implementation of the Law on Free Access to Information	Human Resources Management Agency	Continuous	Number of seminars and participants	Lack of budgetary and/or external means	Yes	Yes
	Training of the state employees and civil servants on implementation of the Law	NGOs	Continuous	Number of NGOs that carry out education	Lack of budgetary and/or external means	Yes	Yes
	Education of the citizens and NGOs on implementation of the Law on Free Access to Information	Ministry of Culture and media, NGOs	2008	Prepared manual	Lack of budgetary and/or external means	Yes	Yes
	Preparation of the Manual for state employees	All state bodies (obligatory enforcers of the Action Plan)	Continuous	Number of solved cases in relation to number of submitted request, number of decisions repealed in second instance and court proceeding	Lack of budgetary and/or external means	Yes	Yes
	To enable free access to information, in accordance with the Law						

### C. PUBLIC, CIVIL SOCIETY (INCLUDING PRIVATE SECTOR) AND MEDIA

1.	Joint propaganda-preventive action of the governmental and non-governmental sector and civil society with the aim of raising the level of public awareness on negative consequences of organized crime and corruption	ACID (in cooperation with the Customs Administration, Tax Administration, Police Directorate, Directorate for preventing money laundering, Directorate for public Procurement, Commission for determining conflict of interest, Privatization Council, State Audit Institution, NGO sector, Media)	Continuous	Preparation of quarter reports on implementation of public campaign; number of prepared flyers, brochures, guidebooks, number of published procedures for submitting of complaints, number of fields covered by the informative material	Lack of budgetary and/or external means	Yes	Yes
2.	Introduction and education in training institutions on general notions and appearances of	Ministry of Education and Science, ACID, NGOs	Continuous	Total number of lectures held, number of visited education institutions, number of participants	No risk	Yes	-





**SPECIFIC MEASURES AGAINST CORRUPTION AND ORGANIZED CRIME**

**A. EFFICIENT CRIMINAL PROSECUTION AND TRIAL**

**A.1. PROSECUTOR'S OFFICE**

1.	Capacity building for prosecutors	Increasing the number of prosecutors in accordance with the new Criminal Procedure Code, and the law on State Prosecutor	Supreme State Prosecutor, Prosecutors' Council	2008-2009	Number of new employees in relation to necessary number of prosecutors	Lack of budgetary and/or external means	Yes	-
		Increasing budget for prosecutor's office in accordance with the new Criminal Procedure Code and the law on State Prosecutor, in line with recognized needs to increase following: 1) Number of new prosecutors and administrative staff 2) Premises and technical capacities 3) Staff training 4) Improvement of material conditions of the prosecutors in accordance with the new competencies and authorizations 5) Improvement of material conditions of the employees and servants in accordance with the new competencies and authorizations	Ministry of Finance, Prosecutors' Council	2009	Percentage of prosecution's budget increase in accordance with the increase of number of employees, premises and technical capacities, trainings. Number of organized trainings, fields for which the trainings were held, number of prosecutors participating to every training, indicators of improvement of material conditions of prosecutors, employees, and servants (incomes, beneficiaries, housing)	Lack of budgetary and/or external means	Yes	Yes
		Analyze number and structure of cases in field of corruption, organized crime, in relation to existing staff	Prosecutor's Council	III quarter of 2008	Carried out analysis of number and structure of cases in field of corruption, organized crime, in relation to existing staff	No risk	-	-
		Analyze existing situation regarding the manner and criteria for solving the housing issues and needs of state officials in part referring to bearers of judicial functions	Judicial Council Prosecutor's Council, Ministry of Finance	2009	Carried out analysis, report delivered to the national Commission with proposed solutions	Lack of budgetary means	Yes	-
		Implementation of further training of prosecutors 1) Informing the prosecutors on comparative practice of neighboring countries in field of fight against corruption and organized crime 2) Drafting and implementation of the program of education	Supreme State Prosecutor, Judicial Training Center and State Prosecutors' Association	Until 01.06.2008, Continuously	Drafted program, number of trainings, number of involved fields, total number of participants and number of participants per field	Lack of budgetary and/or external means	Yes	Yes



		prosecutors in regard to crime cases with elements of corruption and organized crime, especially in regard to new forms of criminality (CC and CPC)	Prosecutor's Council, Ministry of Finance	2008-2009	Defined needs, Report on value of acquired equipment in relation to the needed one	Lack of budgetary and/or external means	Yes	Yes
		3) Drafting and implementation of the program of education for criminal acts described in Chapter XXIII of CC and Chapter XXVIII of CC						
		4) Drafting program and implementation of training on application of SSM (in accordance with the comparative practices of the neighboring countries)						
		To define needs and to provide adequate equipment for Department for combating organized crime, for proper proceeding in cases of organized crime, corruption, terrorism, and war crimes						
		Establishing of the Judicial IT system and database and training of prosecutors	Supreme State Prosecutor	Following adoption of the amended Action Plan, 1. Continuous (quarterly)	Number of prosecutor's offices connected by the IT system, total number of the cases per institution, in relation to the total number of cases in database, number of trainings and participants per prosecutor's office 1. Periodical statistical reports	Lack of budgetary and/or external means	Yes	Yes
		1) Collecting, preparation, and analysis of statistical data regarding the perpetrators and the structure of criminal acts						
	1) Capacity building in the Department for the fight against organized crime	Specializing prosecutors for prosecuting of following criminal acts: 1 with elements of corruption 2 organized crime 3 War crimes 4 Terrorism	Supreme State Prosecutor, Judicial Training Center	2008-2009	Total number of trainings, number of trainings per field, total number of participants, number of participants per field	Lack of budgetary and/or external means	Yes	Yes
		Reorganization of existing Department for the fight against organized crime through amendments of the Rulebook on organization and systematization of job positions	Supreme State Prosecutor	2008	Reorganized existing Department, adopted new Rulebook	No risk	-	-
		Increase number of deputies of Special prosecutor for combating organized crime including terrorism, corruption, and war crimes	Supreme State Prosecutor	2008	Number of appointed deputies in relation to number of systematized job positions for deputies	Lack of budgetary means, lack of necessary staff	Yes	-
		Increase number of expert associates in Department for fight against	Supreme State Prosecutor	2008	Number of employed staff in relation to number of systematized job positions	Lack of budgetary	Yes	-

	organized crime						means, lack of necessary staff	
	Signing of international agreements on cooperation	Supreme State Prosecutor	Continuous		Number of signed agreements		Indifference of the prosecutor's offices of other countries for signing of agreements	-
	To determine if is necessary to provide personal protection for the prosecutors proceeding in cases of organized crime, corruption, terrorism, and war crimes	Supreme State Prosecutor, Police Directorate	IV quarter of 2008, Continuous		Adopted plan of protection, number of protected prosecutors		No risk	-
<b>A.2. POLICE</b>								
	Amending of the Rulebook on internal organization and systematization of the Police Directorate	Police Directorate	2008-2009		Adopted Rulebook		No risk	-
	Adoption of the legal act which stipulates that officers of Crime Police Sector are provided with additional payment on basic wage due to complex, specific, and risk tasks they perform within their competencies	MNE Government, Ministry of Finance, Police Directorate, Mol&PA	2008		Adopted act, introduced special additional payment		Lack of budgetary means	Yes
	1. to ensure increase of wages and additional payments for the police officers dealing with cases of organized crime and corruption							
	Adoption of the Instructions on police proceeding and conduct in issuing, conducting, and extradition of persons searched for by international warrants	Police Directorate	2008		Adopted Instructions		No risk	-
	Adoption of the Instructions on protection of whistleblowers	Police Directorate	2008		Adopted Instructions		No risk	-
	To adopt and implement plan of protection of police officers involved in fight against corruption and organized crime	Police Directorate	III quarter of 2008, continuous		Adopted plan of protection, number of persons under protection		No risk	Yes
	To determine needs for training, and implement trainings and strengthen human resource capacities of the Department for Internal Control within the Police Directorate	Police Directorate, Police Academy	continuous		Determined needs, implemented trainings and improved capacities, number of realized trainings in relation to envisaged, number of officers from the internal control who participated in every training individually, comparing to needs		Lack of budgetary and/or external means	Yes
	To determine needs and to acquire necessary equipment for work of	Police Directorate	2008.		Determined needs for equipment, Value of acquired equipment in regard to needs		Lack of budgetary and/or external	Yes





						specialized trainings		
	Requirement needs assessment and purchase of technical equipment for the use of SSM	Police Administration	2008-2009, Ongoing		Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Establishment of unified database of operational intelligence data	Police Administration	2008-2009		Unified database established	No risk	Yes	-
	Securing links and connections with computer networks and databases in telecommunication service providers, in accordance with the police authorization, envisaged in the Criminal Procedure Code	Police Administration	2008		Links established and police access to the computer networks and databases in telecommunication service providers enabled	Lack of readiness of the mentioned institutions to allow the police to use their databases, lack of funds for implementation	Yes	-
	Signing of the agreement with the Central Bank in order to secure the funds for the implementation of SSM, making reports on its implementation	Police Administration, Central Bank of Montenegro	2008		Agreement with the Central Bank signed; periodical reports on its implementation made	No risk	Yes	-
4) Capacity building of the police in the fight against trafficking in human beings	Monitoring implementation of the memorandum on cooperation between responsible ministries and NGO's in the field of fight against trafficking in human beings	National Coordinator Office for fight against trafficking in human beings, Police Administration	2009 Ongoing		Making periodical information on accomplished cooperation	No risk	-	-
5) Capacity building of the police in the fight against smuggling of drugs	Adoption of the National strategy for the fight against drugs and prevention of drug use, with annual action plans	Government of MNE (working group)	2008		National strategy for the fight against drugs and prevention of drug use adopted	No risk	-	-
	Training needs assessment and organizing trainings for officers of the Center for fight against drugs and smuggling	Police Administration Police Academy	Ongoing		Training needs assessed No. of trainings compared to planned; No. of organized specialized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Training needs assessment and organizing trainings for police officers on fight against smuggling of drugs procedure	Police Administration Police Academy	Ongoing		Training needs assessed No. of trainings compared to planned; No. of organized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Requirement needs assessment and purchasing equipment for the needs of Center for fight against drugs and smuggling	Police Administration	2008-2009		Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Provision of adequate working space	Police Administration	2008.		Adequate working space provided	No risk	Yes	-

	for the needs of Center for fight against drugs and smuggling	Police Administration		Ongoing	Training needs assessed No. of trainings compared to planned; No. of organized trainings for officers of the witness protection Unit; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
6) Capacity building of the police in the field of witness protection	Training needs assessment and organizing trainings for officers of the witness protection Unit	Police Administration	2008.-2009	2008.-2009	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Requirement needs assessment and purchasing of specialized equipment for the witness protection Unit	Police Administration		2008, Ongoing	No. of signed agreements	No risk	Yes	Yes
	Signing bilateral agreements with adequate departments in other countries in order to exchange protected witnesses	Police Administration		2008, Ongoing			Yes	Yes
7) Capacity building of the police in the use of forensic and other criminal investigation techniques	1) Needs assessment and Technical equipping of the Center for criminal technique 2) Reorganization of forensic unit 3) Training needs assessment and organizing trainings 4) Requirement needs assessment and purchasing of modern laboratory and other equipment 5) Implementing standards ISO 17025	Police Administration	2008-2009	1. 2008, Ongoing 2. 2008 3. Ongoing 4. 2008-2009 5. 2009	1) Needs assessed; Currency of purchased compared to required equipment 2) Reorganized unit 3) Training needs assessed No. of trainings compared to planned; No. of organized trainings; No. of participants 4) Needs assessed; Currency of purchased compared to required equipment 5) Standards ISO 17025 implemented	Lack of budgetary and/or external funding	Yes	Yes
8) Capacity building of the police in the fight against terrorism	Development of the Strategy for fight against terrorism	Ministry of Internal Affairs and Public Administration in cooperation with Police Administration, Agency for National Security, Ministry of Justice, NGO	2008-2009	2008-2009	Strategy developed	No risk	-	-
	1. Training needs assessment and organizing trainings for officers in the field of fight against terrorism Specialized training: 1) for IED operations (elimination of danger from improvised explosive devices) 2) for PAS (protection against sabotage) 3) for negotiations with hijackers (terrorists)	Police Administration Police Academy		Ongoing	1. Training needs assessed 2. No. of trainings compared to planned; No. of organized trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Requirement needs assessment and purchasing equipment for the needs of	Police Administration	2008.-2009	2008.-2009	Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary	Yes	Yes



	criminality police Sector dealing with suppression of terrorism Capacity building of the existing Special Anti-terrorist unit (SAU) 1) Training plan making 2) Implementation of continuous training 3) Requirement needs assessment and Purchase of modern equipment and arms	Police Administration	1) III quarter 2008, 2,3) Ongoing	1) Training plan made 2) No. of carried trainings compared to planned; No. of trained staff 3) Requirement needs assessed; Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
9) Capacity building of the police in the fight against cross-border crime	Training needs analysis and organization of continuous training for the officers in the border police Sector Requirement needs assessment for purchasing equipment for surveillance and securing the state border. 1.) Purchase of equipment for surveillance and securing the state border and discovery of cross-border crime	Police Administration Police Academy	Ongoing	Training needs assessed and number of organized trainings compared to planned; No. of carried trainings; No. of participants Requirement needs plan determined 1. Currency of purchased compared to required equipment	Lack of budgetary and/or external funding	Yes	Yes
	Better quality cooperation at bilateral and regional level (consulting meetings, planning and conduction of mutual activities etc.) and making reports on cooperation with recommendations submitted to the National Commission	Police Administration (border police Sector) and border polices of neighbor countries	Ongoing	No. of implemented joint actions; No. meetings organized; No. of reports made; No. of recommendations given; No. of recommendations implemented; No. of reports submitted to the National Commission	Insufficient interest of countries in region for more qualitative cooperation	-	-
10) Capacity building of the police through international police cooperation	Reorganizing actual NCB Interpol and forming organizational unit for international police cooperation within whose scope there will be: 1) Interpol NCB 2) Europol NCB	Police Administration	2008-2009	Organizational unit for international police cooperation formed within whose scope are systemized: 1) NCB Interpol 2) NCB Europol	No risk	-	-
10.1. International police cooperation through Interpol	Direct connection with the communication system I-24/7 in order to establish communication with Interpol	Police Administration (NCB Interpol) in cooperation with Interpol General Secretariat	Ongoing	Use of I-24/7 system in the exchange of police data	No risk	Yes	
	Training needs assessment and training of officers who will perform duties regarding international police cooperation through Interpol 1) Training for the use of Interpol systems	Police Administration	Ongoing	Training needs assessed and number of carried trainings compared to planned; No. of participants	Lack of budgetary and/or external funding	Yes	Yes
	Participation of the Interpol NCB	Police Administration	Ongoing	No. of working groups and bodies where the	Lack of	Yes	Yes



	officers in the Interpol's working bodies, groups and projects, with the aim of fight against international organized crime in region				Interpol NCB officers participated compared to total number of working bodies and groups treating problems of fight against organized crime in region (to whom Montenegro belongs too)	budgetary and/or external funding	
	Requirement needs assessment and working equipment acquisition in accordance with recognized Interpol trends in development hardware and software communication equipment	Police Administration	2008-2009		New hardware and software solutions identified; requirement needs assessed, currency of acquired compared to required equipment; Acquired equipment; equipment operating	Lack of budgetary and/or external funding	Yes
	Extension Interpol' services at border crossings with the purpose of performing direct searching in the Interpol's database and certifying persons, travel papers and vehicles at BCP's	Police Administration	2008-2009		No. of BCP networked with the Interpol compared to total number of BCP	Lack of budgetary and/or external funding, providing adequate infrastructure at the BCP's in order to install Interpol's Communication systems	Yes
10.2. International police cooperation through Europol	Signing strategic agreement with Europol in order to provide data exchange between Europol and Police Administration	Police Administration	2008		Strategic agreement signed; No. of cases when data have been exchanged	Europol's decision on the term of signing the Agreement with Montenegro	-
	Forming the Europol National Central Bureau	Police Administration	2008-2009		Europol NCB formed	No risk	-
	Recruiting required staff within the Europol NCB	Police Administration	2008-2009		Europol NCB fulfilled; % of hired personnel	No risk	-
	Establishment of secure communicational system for data exchange with Europol	Police Administration in cooperation with Europol	2009		Secure communicational system for data exchange with Europol established	Delay in signing strategic and operational agreement, which is a condition for system establishment	Yes
	Training needs assessment and carrying out trainings for officers of Europol NCB in order to use Europol's analytic-intelligence programs in information processing	Police Administration in cooperation with Europol	2008, Ongoing		Training needs assessed and number of carried trainings compared to planned; No. of trainings; No. of participants; Educated staff for using modern analytic-intelligence programs	Lack of budgetary and/or external funding	Yes
<b>A.3. JUDICIARY</b>							
3.	Capacity building of courts	Court President	Ongoing		No. of courts with electronic allocation of cases	No risk	-

introduction of electronic case coding and allocation (using as much as possible the information technologies)	1) Regular and ongoing supervision of court administration by the Ministry of Justice pursuant to the Law on Courts 2) Strict application of the provisions on disciplinary responsibility of judges and the dismissal procedure pursuant to the Law on Courts	1) Ministry of Justice 2) Judicial Council	2008-2009		1) Acting upon reports of authorized officers of the Ministry of Justice 2) Number of proceedings compared to reported cases of disciplinary responsibility of judges	Lack of budgetary funding	Yes	-	
Strengthen the independence of the judiciary powers through making requirement plan for increasing financial resources in the budget allocation	1. Provide accumulation of salaries and special allowances to judges proceeding in cases with elements of corruption and organized crime	Judicial Council, Ministry of Finance			Accumulation plan made of determined financial resources in the budgetary allocation of MNE and level of resources accumulation per year				
Establishing a Special Department for fight against organized crime, corruption, terrorism and war crimes within the High courts in Podgorica and Bijelo Polje		Judicial Council	III quarter of 2008.		Department established; % of hired personnel for judges and associates; No. of cases in process; Total No. of sentences; No. of acquittal/conviction and revoked sentences	No risk	Yes	-	
Determine required number of judges within the Special Department for fight against organized crime, corruption, terrorism and war crimes within the High courts in Podgorica and Bijelo Polje		Judicial Council	III quarter of 2008		Required number of judges determined	No risk	Yes	-	
Dispose/ hire required personnel within courts, in accordance with determined needs		Judicial Council	IV quarter of 2008		Required personnel disposed/hired in courts compared to determined needs and % of hired personnel compared to required	No risk	Yes	-	
Establishment of the Judicial Informational System with integrated database and training of judges	1. Acquisition, development and analysis of statistic data related to perpetrators and felonies structure	Judicial Council	2009		Judicial Informational System established; No. Of courts connected with the Informational system; Periodical statistic reports; Training needs assessed and number of trainings compared to planned; No. of trainings; No. of participants	Lack of budgetary and/or external funding	Yes	Yes	
Determine requirements and provide protection of judges proceeding in cases with elements of corruption,		Judicial Council, Police Administration	IV quarter of 2008, Ongoing		Requirements for personal protection of judges determined; No. of judges to whom personal protection is provided	No risk	Yes	-	

	organized crime, terrorism and war crimes	Centre for Education of the Bearers of Judicial Function	IV quarter of 2008, Ongoing	Report of the Centre for Education of the Bearers of Judicial Function in developed annual and periodical training program	No risk		
	Develop separate annual and periodical training programs for judges proceeding in cases with elements of corruption and organized crime	Centre for Education of the Bearers of Judicial Function	Ongoing	No. of judges passed through the training program; report of the Centre on training program realization; No. of carried compared to No. of planned trainings; Number and areas of trainings and number of participants per training	Lack of budgetary and/or external funding	Yes	
	Carrying out trainings according to separate determined program	Judicial Council	II quarter of 2008	Rules of Procedure adopted and criteria and procedures established for election of judges procedure	No risk	-	
	Determining Rules of Procedure of the Judicial Council with the purpose of establishing criteria and procedures for election of judges procedure	Judicial Council					
<b>B. EXTERNAL AUDIT OF THE BUDGET</b>							
1.	Supervision of budgetary revenues and expenditures	State Auditors Institution	Once a year (by the end of the second quarter) Ongoing	External budgetary audit report; No. of non-conformities and No. of recommendations; No. of corrective measures compared to total No. of non-conformities; No. of criminal charges after the audit	No risk	Yes	
2	Supervision of regularity, effectiveness and efficiency of the operation of budgetary beneficiaries at the level of Montenegro and municipalities	State Auditors Institution	Ongoing	Budget audit report; No. of implemented audits and submitted reports in spending units, accounts of settlement of municipalities and other subjects; No. of recommendations and % of accepted recommendations out of individual audits by audit subject; % of adopted recommendations by the Parliament out of the annual report of the State Auditors Institution; No. of specific reports; No. of non-conformities and No. of recommendations No. of corrective measures compared to total No. of non-conformities; No. of criminal charges for irregularities in budget management and allocation	No risk	Yes	
3	Prevention of abuses	State Auditors Institution	2009	Increased level of IT support in the State Auditors Institution; IT trainings for employees done; No. of trainings; No. of electronic connections with the consumer units – audited entities; Methodological manual innovated on the basis of acquisitions and experiences and EU audit standards for public sector	Lack of human resources for public sector audit	Yes	
	Strengthening administrative and technical capacities of the State Auditors Institution through:	State Auditors Institution	Ongoing	Training plan made; No. of new employed; No. of	No risk	Yes	
	1. Further technical equipment and introduction of Intranet into the State Auditors Institution						
	2. Electronically connecting with the Ministry of Finance and all consumer units – audited entities						
	3. Innovation of Methodological Instruction of Audit Performance of public sector auditing						

	persons in charge of budget management and allocation	Institution and Human Resources Administration in cooperation with NGO			trainings; No. of participants		
in budgetary execution	Raising public awareness regarding the supervision of budgetary spending through the development and dissemination of a guide and a media campaign	State Auditors Institution, in cooperation with media and NGO	Ongoing		Guide book prepared; No. and kind of educational activities	No risk	Yes
	Preparation of public relations Strategy with the aim of timely information provided to the public on budgetary spending and the implementation of planned audits pursuant to the Law on State Auditors Institution	State Auditors Institution in cooperation with media and NGO	Ongoing		Strategy prepared; annual and periodical reports of the State Auditors Institution	No risk	-
<b>C. INTERNAL AUDIT</b>							
1	Supervision of the legality of operation of budgetary beneficiaries	Ministry of Finance– Department for Internal Audit	Ongoing		Budgetary audit report; No. of non-conformities and No. of recommendations, No. of corrective measures compared to total No. of non-conformities; No. of criminal charges after the audit	No risk	Yes
2.	Strengthening administrative capacities of new Sector for public internal financial control (PIFC)	Ministry of Finance	2009.		No. of determined bylaws; Rulebook on internal organization and systematization of the Ministry of Finance changed; sector reorganized; No. of new employees; No. of trainings; No. of established units for internal audit of budgetary beneficiaries; Guide book for internal auditing determined	No risk	Yes
<b>D. INSTITUTIONAL CAPACITY BUILDING FOR ANTICORRUPTION POLICY IMPLEMENTATION IN PRIVATISATION PROCESS</b>							
1	Establish efficient privatization process control by Parliament	1. Parliament 2. 3. Commission for monitoring transparency in privatization process	1. Immediately after adoption AP 2. 30 days after adoption AP 3. Ongoing		1. Commission established 2. Rules of procedure adopted 3. No. of meetings of Commission; No. of inquiries submitted to institutions involved in privatization and No. of acquired responses; No. of consultative hearings and recommendations and level of recommendation accomplishment	No risk	-

2.	Capacity building of external (state) audit in privatization process control	Auditing legality and efficiency of management the state assets and obligations, budgets and all financial affairs of subjects whose financial resources are public or issued by using state assets	State Auditors Institution	Ongoing	No. of included new kinds of audit into the annual audit plans (preliminary, control, intersection audit, efficiency audit of subject's operations); No. of performed audits and submitted reports; No. of recommendations given and % of accepted recommendations by audit subject out of individual audits; periodical reporting to the National Commission	No risk	-
3	Observe the principle of transparency in privatization	Organizing public discussions on privatization plans and strategies for entities of strategic significance, particularly in the area of energetic, traffic, tourism and public companies privatization  Establish a system to control investments in privatized companies  Making reports on published public tenders for election legal and financial advisers in privatization  Informing the public and the employees of their rights to participate in decision-making and monitoring of the privatization process  Providing access to all information related to privatization on the basis of Law on free access to information  Posting all the documents significant for privatization process transparency at the Agency web site (tenders and other materials related to privatization under the competency of Privatization Council and Montenegro Agency for Economic Restructuring and Foreign Investments)	Ministry for Economic Development, Ministry of Transport, Maritime Affairs and Telecommunications, Ministry of Agriculture, Ministry of Tourism and Environmental Protection  Privatization Council Montenegro Agency for Economic Restructuring and Foreign Investments  Privatization Council  Privatization Council, Montenegro Agency for Economic Restructuring and Foreign Investments Montenegro Agency for Economic Restructuring and Foreign Investments Montenegro Agency for Economic Restructuring and Foreign Investments	Ongoing  Ongoing  Ongoing  Ongoing  Ongoing	Reports on number of organized public discussions; No. of participants, No. of comments; No. of accepted compared to No. of rejected comments; Manner of submitting feedbacks on accepting/rejecting comments to the public discussion participants  System established; No. of companies included in system; No. of violations of privatization contracts; No. of terminated contracts due to non-compliance with contractual obligations  No. of published tenders and other related information in reporting period  No. of submitted inquiries and questions in written form, directly to Privatization Council and Montenegro Agency or to the News-paper "Pobjeda"; No. of responses sent to citizens and employees No. of positive/negative replies compared to No. of requests received; No. of decisions revoked by court  No. of posted tenders and other documents at the web site of the Agency in the reporting period	No risk  No risk  No risk  No risk  No risk	Yes  -  -  -  -
4	Integrity development of officers involved in privatization process	1. Implementing procedures for reporting non-compliances and corruption in privatization	1. 2. Commission for examining comments, complaints, prepositions	Ongoing	1. 2. – Report on work of the Commission; total number of reports, anonymous reports; institutions whom reports were submitted;	No risk	-

	2. Implementing procedures for reporting conflict of interest in privatization	and suggestions of citizens and other subjects on privatization process		feedbacks form competent institutions		
	Developing Booklet for reporting instances of corruption in privatization process	Anticorruption Initiative Administration, in cooperation with Commission for examining comments, complaints, propositions and suggestions of citizens and other subjects on privatization process	2008	Booklet developed	No risk	-
<b>E. ADMINISTRATION FOR PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING</b>						
1	Harmonization of the operation of the Administration for Prevention of Money Laundering and Terrorism Financing with the new legislative framework	Administration for Prevention of Money Laundering and Terrorism Financing Ministry of Finance, Government of MNE	1, 2 III quarter of 2008. 3. 2008	1. Regulations adopted 2. Department established 3. Increased No. of new employees within the Administration; no. of new employed; Total No. of trainings; No. of trainees	1,2, No risk 3. Lack of human and financial capacities	Yes
	Capacity building of the Administration for Prevention of Money Laundering and Terrorism Financing through: 1. Changing and adoption of the new Regulations on Internal Organization and Systematization in accordance with the Law on Prevention of Money Laundering and Terrorism Financing 2. Establishment of the Department for the Supervision of reporting entities 3. Recruiting personnel as per the new Regulations on Internal Organization and Systematization and new staff training	Administration for Prevention of Money Laundering and Terrorism Financing and other in line bodies out of the article 86 of the Law on Prevention of Money Laundering and Terrorism Financing (except physical persons)	2008.	Directives determined by Administration for Prevention of Money Laundering and Terrorism Financing, Central Bank of MNE, Agency for insurance Supervision, Administration for games of chance, Commission for valuable papers, Prevention of Money Laundering and Terrorism Financing Strategy	No risk	-
	Determining risk analysis directives					



2	Training of the employees of the Administration for Prevention of Money Laundering and Terrorism Financing	Participation to seminars organized by international institutions	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of attendees; No. of seminars whereon the representatives of the Administration participated	Lack of budgetary and/or external funding	Yes	Yes
3	Updating /amending list of indicators of suspicious transactions related to new methods of money laundering and terrorism financing	Participation of the representatives of the Administration in the working groups of the Egmont Group	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of meetings of EGMONT whereon the representatives of the Administration participated	Lack of budgetary resources	Yes	-
4	Training of authorized persons and employees of reporting entities	Current status analysis and, accordingly needs assessment for defining amended list of indicators (in accordance with the article 46 of the Law, list of indicators is being determined by Ministry of Finance on the basis of professional ground prepared by the Administration for Prevention of Money Laundering and Terrorism Financing in cooperation with other in line bodies out of the article 86 of the Law on Prevention of Money Laundering and Terrorism Financing (except physical persons)	Ministry of Finance, Administration for Prevention of Money Laundering and Terrorism Financing, Central Bank of MNE, in cooperation with other in line bodies out of the article 86 of the Law on Prevention of Money Laundering and Terrorism Financing (except physical persons)	Ongoing	Total number of new indicators; Potentially, amended list of indicators of suspicious transactions determined	No risk	-	-
5	Enhancing regional cooperation	Making training plan for the purpose of organizing seminars for authorized persons of reporting entities and the employees having direct contact with clients	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	Training plan made; Total number of seminars and conferences as per institutions and areas	Lack of budgetary and/or external funding	Yes	Yes
6	Enhancing internal cooperation	Agreement implementation analysis on cooperation with financial intelligence units within the region, and needs assessment for signing new agreements	Administration for Prevention of Money Laundering and Terrorism Financing	2008, Ongoing	Needs assessment analysis made on signing bilateral on exchange financial-intelligence data, information and documentation with authorized bodies of other countries, as well as international organizations; No. of submitted reports on suspicious transactions to prosecution/police, as a result of international cooperation	No risk	-	-
		Innovate current or signing new cooperation agreements with FIU from the region on the basis of conducted analysis	Administration for Prevention of Money Laundering and Terrorism Financing	2008, Ongoing	Total number of agreements compared to assessed needs for signing new or innovating current agreements	No risk	-	-
		Maintaining regional meetings with the FIU from the neighboring countries	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	No. of regional meetings	Lack of budgetary and/or external funding	Yes	Yes
		Agreement implementation analysis on cooperation with other authorized state bodies and organizations	Administration for Prevention of Money Laundering and Terrorism Financing	Ongoing	Analysis made; No. of submitted reports on suspicious transactions to prosecution/police as a result of inter institutional cooperation	No risk	-	-





<b>F. PUBLIC PROCUREMENT</b>										
1	Capacity building for implementation of Law	Needs assessment and recruiting new staff	Public Procurement Directorate, Commission for the Control of Public Procurement Procedure	Ongoing	No. of recruited staff compared to No. of capacity needs	Lack of budgetary resources	Yes	-		
		Making training needs plan and conducting trainings for implementation of Law on Public Procurement (Public Procurement Directorate, public procurement officers and bidders)	Public Procurement Directorate, Human Resources Agency	Ongoing	Training needs plan made; No. of trainings compared to no. of needed; No. of trained staff	No risk	Yes	Yes		
		IT Training for public procurement officers and bidders	Public Procurement Directorate in cooperation with Secretariat for Development	2008.	No. of trainings, No. of trained staff	Lack of budgetary and/or external funding	Yes	Yes		
2	Provision for efficient implementation of the Law on Public Procurement in fight against corruption	Develop Public Procurement Manual	Public Procurement Directorate, in cooperation with Commission for the Control of Public Procurement Procedure	III quarter of 2008.	Public Procurement Manual developed	No risk	Yes	Yes		
		Provisions of conditions for the implementation of the Public Procurement Law regarding the electronic public procurement system	Public Procurement Directorate in cooperation with Secretariat for Development	2008-09	The electronic public procurement system established	Lack of budgetary resources	-	Yes		
		Creation of the electronic register book	Public Procurement Directorate	2008-09.	Electronic register book established	Lack of budgetary and/or external funding	Yes	Yes		
		Develop comparative analysis on the protection of the rights of bidders in the Western Balkan countries	Public Procurement Directorate	2008. Ongoing	Comparative analysis done	No risk	Yes	Yes		
		Report irregularities with the elements of corruption in the public procurement procedures 1. Creating precise directives on corruption reporting procedure in public procurement and manner of handling reports of	Commission for the Control of Public Procurement Procedure	1. III quarter of 2008. 2, 3, 4 Ongoing	1. Precise directives created and published 2. No. of reported cases; No. of non proceeded reported cases; No. of cases submitted to prosecution/police; No. of tenders canceled due to reported cases; No. of criminal charges 3. No. of submitted information to the Police Administration compared to determined	No risk	-	-		

	citizens 2. Operating of a phone line to report corruption 3. Informing the prosecution and police on determined irregularities with the elements of corruption in the public procurement procedures 4. Making six-month reports on work of a phone line to report corruption and posting reports at the website	Commission for the Control of Public Procurement Procedure	III quarter of 2008, Ongoing	irregularities; No. of criminal charges submitted to prosecution/police based on irregularities observed by the Commission for the Control of Public Procurement Procedure 4. Reports on work of a phone line made and posted at the web site	No risk	-	-
	Making and submitting reports on procurement plans monitoring compared to envisaged and accomplished shopping methods (regarding to legal limitation to announce the shopping method not more than twice a year for services, goods and pursuits) and canceling procedures in the cases of legal offences	Public Procurement Directorate	III quarter of 2008, Ongoing	No. of reports made; No. of enforcers of the Law whose public procurement plans are monitored; No. of tenders canceled due to announcing more than two shopping methods; No. of charges submitted to prosecution/police based on received information	No risk	Yes	Yes
3	Provision of better transparency and efficiency in the public procurement procedure and protection of the rights of bidders	Commission for the Control of Public Procurement Procedure	III quarter of 2008, Ongoing	No. of submitted compared to No. of posted complaints; No. of positive/negative issuing of prosecution/police based on irregularities determined during the complaint procedure	No risk	-	-
	Posting at the web site procurement plans of all enforcers of the Law in a time limit envisaged by Law	Public Procurement Directorate	III quarter of 2008, Ongoing	No. of posted procurement plans compared to No. of enforcers	No risk	-	-
<b>G. COMMISSION FOR ESTABLISHING CONFLICT OF INTEREST</b>							
1	Efficient control of the accuracy of submitted data	Commission for Establishing the Conflict of Interests	Ongoing	No. of submitted pieces of information compared to the no of irregularities determined	No risk	-	-
	Making needs analysis for capacity building of Commission for	Commission for Establishing the Conflict	2008	Analysis made	No risk	-	-

		Establishing the Conflict of Interests due to new competencies envisaged by new Law on Prevention of Conflict of interest in carrying out public function 1. In accordance with determined needs, modify the Rulebook on internal organization and systematization of working positions 2. Accordingly to modified Rulebook, enhance human resources	of interests				1. Rulebook modified 2. New staff recruited due to modified Rulebook			
2	Training for all those involved in the implementation of Law on Prevention of Conflict of Interest in carrying out public function	Training for public officials (local officials), NGO representatives, Media representatives	Commission for Establishing the Conflict of interests, in cooperation with NGOs and the media	Ongoing		No. of trainings; no of persons who have undergone training	Lack of budgetary and/or external funding	Yes	Yes	Yes
<b>H. STATE ELECTION COMMISSION</b>										
1	Continue with the harmonization of functioning with legislation framework and capacity building of the State Election Commission	Adopting new Rulebook on internal organization and systematization of the State Election Commission	State Election Commission	2008.	Rulebook adopted	No risk	No risk	-	-	-
		Establishing Department for monitoring transparency of political parties and candidates financing, in accordance with the Law on State Election Commission	State Election Commission	2008.	Department for monitoring transparency of political parties and candidates financing established	Adoption of the Law on State Election Commission	Adoption of the Law on State Election Commission	Yes	-	-
		Establishing the Unit within the State Election Commission for submitting and processing reports on instances of misuses and pressures put on electors during the election process	State Election Commission	2008	No. of reports of citizens; No. of reports submitted to the Police Administration; No. of submitted misdemeanor or criminal charges; No. of sentences	Adoption of the Law on State Election Commission	Adoption of the Law on State Election Commission	-	-	-
		Enhance human resources according to new Rulebook on internal organization and systematization	State Election Commission	2008.	No. of new staff	Lack of human and financial capacities	Lack of human and financial capacities	Yes	Yes	Yes
		Training plan making and education of employees and members of both the State Election Commission and election commissions in the municipalities	NGO, State Election Commission	2008, Ongoing	Training plan made; No. of trainings compared to planned; No. of participants	Lack of human and financial capacities	Lack of human and financial capacities	Yes	Yes	Yes

2	Integrity development of the State and Municipality Election Commissions	Development of a Code of Ethics for public servants within the State Election Commission and election commissions in the municipalities Establishing Ethical Board Making annual analysis on implementation of the Code of Ethics Organizing periodical trainings on implementation of the Code of Ethics	State Election Commission State Election Commission Ethical Board of the State Election Commission Ethical Board and NGO	2008. 2008. 2008 2008	Code of Ethics developed Ethical Board established Annual analysis on implementation of the Code of Ethics made; No. of disciplinary initiatives for non observance of the Code of ethics No. of trainings held; No. of State and Municipal members of election commissions participated at trainings Required equipment acquired in accordance with identified needs.	No risk No risk No risk Lack of budgetary and/or external funding Lack of budgetary and/or external funding No risk	- - - Yes Yes -
3	Enhancing financial transparency in work of the State Election Commission	Making detailed financial annual report for elections carried out by State Election Commission and election commissions in the municipalities and posting reports at the website	State Election Commission and election commissions in the municipalities	Ongoing	No. of posted reports	No risk	-

### I. TAX ADMINISTRATION

1	Prevention of corruption within the Tax Administration	Making six-month reports on work of a phone line to report corruption and posting reports at the website Strengthening the Internal Control Department of the Tax Administration 1) Training of staff of the Internal Control Department 2) Making six-month reports on performed internal controls Strengthening external control through: Six-month reporting on supervision and their posting on the websites of the Ministry of Finance and the Tax Administration	Tax Administration Tax Administration Ministry of Finance	Ongoing 1; 2; Ongoing III quarter of 2008. Ongoing	No. of reported instances of corruption; No of filed complaints to the in line bodies compared to No. of reported cases; reports posted at the website of Tax Administration 1) No. of trainings undertaken and no of persons who have undergone training 2) Reports made; No. of irregularities identified; No. of disciplinary initiatives compared to no. of irregularities identified; No. of denunciation/information submitted to the prosecution/police Reports made and posted at the websites; No. of irregularities identified; No. of denunciation compared to no. of irregularities identified	No risk No risk No risk	Yes Yes -
---	--	---	---	--	---	-------------------------------	-----------------

	Monitoring the observance of the Code of ethics of public servants within the Tax Administration	Tax Administration	Ongoing	Number of servants disciplinary sentenced for non observance of the Code of ethics	No risk	-	-
2	Automation of the taxing procedure	IT training of staff	Ongoing	No. of trainings; No. of trainees	No risk	Yes	-
3	Enhanced cooperation with the police and prosecutors	Making reports on realization of the signed agreements on cooperation	Ongoing (quarterly)	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to signed agreements	No risk	-	-
	Enable the police to have direct access to Tax Administration databases	Tax Administration, Police Administration	II quarter of 2008, Ongoing	Direct access to Tax Administration databases enabled due to signed agreements	No risk	-	-
<b>J. CUSTOMS ADMINISTRATION</b>							
1	Prevention of corruption in customs services	Enhance the system of communication with the public 1) Create a campaign whereby the public will be informed that on a current phone line for reporting instances of smuggling, instances of corruption in the Customs Administration can be reported as well 2.) Establish an orderly operating centre for informing the public on customs procedures 3.) Making six-month reports on reporting instances of corruption 4) Development of Guidelines for the public	Customs Administration	1. Campaign created and conducted 2. Orderly Operating Centre established 3. Six-month reports made: number of reported instances of corruption, no of complaints filed with competent bodies compared to the number of instances, reports posted at the Customs Administration website and submitted to the National Commission 4. Guidelines developed	No risk	Yes	Yes
	Revision of the Action Plan on integrity development in customs service	Strengthening the Internal Control Department of the Customs Administration :	Customs Administration	1) Training of staff of the Internal Control Department 2) Development of Rules of Operation for the Internal Control Department 3) Making six-month reports on performed internal controls 4) Establishing a data base of the Internal Control Department	Action Plan revised, in accordance with the Arusha Declaration	No risk	-
			Customs Administration	1. Ongoing 2. III quarter of 2008. 3. Ongoing 4. 2008.	1) No. of trainings undertaken and No. of persons who have undergone training 2) Rules of Operation made, 3) Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to irregularities identified in the customs officers performance 4) Database established	No risk	Yes

	Strengthening external control through making six-month reports supervision and their posting on the websites of the Ministry of Finance and the Customs Administration	Ministry of Finance	I quarter of 2008.	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to irregularities identified	No risk	-	-
	Development of a Code of Ethics for public servants within the Customs Administration	Customs Administration	III quarter of 2008.	Code of Ethics made	No risk	-	-
	Monitoring the observance of the Code of ethics of public servants within the Customs Administration	Customs Administration	Ongoing	Number of servants disciplinary sentenced for non observance of the Code of ethics	No risk	-	-
2	Automation of customs procedure	Customs Administration	Ongoing	No of trainings, no of trainees	No risk	Yes	-
	Strengthening technical capacities in terms of acquisition of modern technical equipment at the border crossing points for identification of goods illegally transported over border crossings	Customs Administration	2008, Ongoing	Equipment purchased for scanning vehicles at border crossings for finding hidden goods	Lack of budgetary and/or external funding	Yes	Yes
3	Enhanced cooperation with the police and prosecutors	Customs Administration, Police Administration, Supreme State Prosecution	II quarter of 2008.	Agreements signed	No risk	-	-
	Making reports on realization of the signed agreements on cooperation	Customs Administration	Ongoing (quarterly)	Reports made and submitted to the National Commission: No. of denunciation/information submitted to the prosecution/police compared to signed agreements	No risk	-	-
	Enable the police to have direct access to Customs Administration databases	Customs Administration, Police Administration	I quarter of 2008. Ongoing	Direct access to Customs Administration databases enabled due to signed agreements	No risk	-	-
<b>K. ADMINISTRATION FOR ANTI-CORRUPTION INITIATIVE</b>							
1	Capacity building of the Administration for Anti-corruption Initiative	Administration for Anti-corruption Initiative	Ongoing		Lack of human and financial capacities	Yes	-
	Enhance human and financial resources of the Administration for Anti-corruption Initiative for carrying out new competencies, according to the Changes and amendments of the Regulation trough:						
	1. Systematization of new working positions in the Department for promotion preventive performance (7 new working positions)		1. 2008	1. New Systematization adopted, open competition announced, new staff employed, number of trainings			
	2. Providing adequate working premises		2. 2009	2. Adequate working premises provided			
	3. Acquisition of required computer and office equipment		3. 2008	3. Equipment purchased			



2	Raising the level awareness and encourage the public to report instances of corruption	Development and distribution of surveys on the existing forms, causes and methods of the appearance of corruption	Administration for Anti-corruption Initiative, NGO, Media	Ongoing	Number and scope of conducted researches, number of fields covered by researches, reports published at the website	Lack of budgetary fund, survey methods	Yes	Yes
3	Proposals for introduction and application of European and other international anticorruption standards and instruments	Development and dissemination of information and promotion materials  Coordinate the activities on promotion and implementation of the Council of Europe's Civil and Legal Convention on Corruption	Administration for Anti-corruption Initiative  Administration for Anti-corruption Initiative in cooperation with competent bodies	Ongoing  Ongoing	Information and promotion materials developed and disseminated  Report on realized activities	Lack of budgetary fund  Financial and human capacities, cooperation with competent bodies	Yes  Yes	Yes  Yes
4	Compliance with the obligations undertaken under RAI (Regional Anticorruption Initiative) and GRECO (Council of Europe's Group of States against Corruption)	Coordinate activities regarding full implementation of the UN Convention against Corruption 1) Preparation of current legislation amendment proposals in accordance with the Analysis results on level of harmonization with the UN Convention against Corruption and undertaking specific measures towards full implementation of the UN Convention against Corruption	Ministry of Internal affairs and Public Administration, Ministry of Finance, Administration for Anti-corruption Initiative	2008-2009	Prepared proposals on law changes	No risk	Yes	-
		Coordinate activities undertaken within the RAI (Regional Anticorruption Initiative) and GRECO	Administration for Anti-corruption Initiative	Ongoing	Report on realized activities	Institutional, human and financial resources	Yes	Yes

## ABBREVIATIONS

AP	Action plan
MAfERaFI	Montenegrin Agency for Economic Restructuring and Foreign Investments
CCCR	Commercial Court Central Register (in Podgorica)
PPD	Public Procurement Directorate
DNK	Dezoksiribo Nuclein Acid
SAI	State Audit institution
EAR	European Agency for Reconstruction
EU	European Union
FIU	Financial Itelligence Unit
GRECO	Groupof Countries of South East Europe for fight against Corruption
IED	Improvised Explosive evices
IT	Informational technologies
SEE	South East Europe
CC	Criminal Code
MFA	Ministry of Foreign Affairs
SSM	Secret Surveillance Measures
MUPIJU	Ministry of Internal Affairs and Public Admininstration
NCB	National Central Bureau
NGO	Non-Governmental Organizations
PACO	Program Against Corruption and Organized Crime in u South East Europe
PIFC	Public Internal Financial Control
PDZ	Protivdiverziona zaštita
RAI	Regional Anti-corruption Initiative
RMNE	Republic of Montenegro
SATI	Specijal Anti Terrorist Unit
CE	Council of Europe
SEI	Secreterijat for European Integrations
ACI	Administration for Anti-corruption Initiative
UN	United Nations
UNTOC	United Nations Convention against Trans national Organized Crime
HRA	Human Resources Aaency
APMLTF	Administration for Prevention of Money Laundering and Terrorism Financing
CPC	Criminal Procedure Code
SSP	Supreme State Prosecution

	Commission in charge of drafting the changes and amendments of the Action Plan for Fight against Corruption and Organised Crime
President	Dejan Đurović, NCB Interpol, Police Administration
Members	Petko Spasojević, Head of the Department for Combating Commercial Crime, Police Administration
	Petar Stojanović, Supreme Court
	Veselin Vučković, Supreme State Prosecution
	Željko Tomović, Advisor to the Minister, Ministry of Justice
	Nada Vukanić, Ministry of Internal Affairs and Public administration
	Rajko Malović, Head of the Department for Fight against Organized Crime, Police Administration
	Vanja Čalović, Coordinator, Network for Promotion of Non-governmental Sector
	Zlatko Vujović, NGO Centre for Monitoring (CEMI),
	Svetlana Rajković, Advisor Cabinet of Deputy Prime Minister for EU Integration
Secretary	Dimitrija Šaranović, Senior Advisor, Administration for Anti-corruption Initiative