

D E C I S I O N

on the approval of the National Program of Integrity and Anticorruption for 2024–2028 and of the Action Plan for the implementation of the National Plan of Integrity and Anticorruption for 2024–2028

The Parliament approves this decision.

Art. 1. – The National Program of Integrity and Anticorruption for 2024–2028 and the Action Plan for the implementation of the National Program of Integrity and Anticorruption for 2024–2028, presented in annexes no. 1 and no. 2, are approved.

Art. 2. – The public entities shall take the necessary measures in order to fulfil the National Program of Integrity and Anticorruption for 2024–2028 and of the Action Plan for its implementation.

Art. 3. – The monitoring and evaluation of the National Program of Integrity and Anticorruption for 2024–2028 and of the Action Plan for its implementation shall be entrusted to the National Anticorruption Centre.

Art. 4. – This decision shall come into force on the date of its publication in the Official Gazette of the Republic of Moldova.

**PRESIDENT OF THE PARLIAMENT
IGOR GROSU**

**Chisinau, 28 December 2023.
No. 442.**

**NATIONAL PROGRAM
OF INTEGRITY AND ANTICORRUPTION
for the years 2024–2028**

I. INTRODUCTION

1. European integration is a fundamental desideratum of internal and foreign policy of the Republic of Moldova and its Government, as it has a strong potential to facilitate corruption preventing and fighting policy, which is among the main priorities.

2. With the implementation of the Association Agreement between the Republic of Moldova, on the one side, and European Union and European Community of Atomic Energy, and their member states, on the other side (ratified by the Parliament of the Republic of Moldova by the Law no. 112/2014), with the visa regime liberalization and gradual integration into the internal market of the European Union, the *de facto* integration of the Republic of Moldova in the European political and economic space takes place. Currently the Government is fully dedicated to the objective of modernization and development of the Republic of Moldova, envisaged by the European integration. The Association Agreement stipulates, according to its art. 4 lit. e) of title II „Political dialogue and reforms, cooperation in the sphere of foreign and security policy”, the need to undertake certain important internal reforms, including by “ensuring the efficacy in fighting corruption, especially with a view to improving international cooperation on fighting corruption, as well as ensuring effective enforcement of the relevant internal legal instruments, such as the United Nations Convention against corruption of 2003”.

3. Preventing and fighting corruption as well as promoting integrity in public sector and justice have become national priorities and conditionalities for the Republic of Moldova in relation to its development partners. In this regard, the objectives and actions on fighting the corruption phenomenon have been integrated in many national strategic documents and correlated so as to ensure the fulfilment of the commitments undertaken by the Republic of Moldova.

4. The National Program of Integrity and Anticorruption for 2024–2028 (hereinafter – the *Program*) is in accordance with the priorities stated in the United Nations Convention against Corruption (approved in New-York on 31 October 2003, signed by the Republic of Moldova on 28 September 2004 and ratified by the Parliament of the Republic of Moldova by Law no. 158/2007), which commits the signatory states to develop, implements and ensure efficient anticorruption policies, coordinated with those stated in the Association agenda between the Republic of

Moldova and the European Union for 2022–2027, as well as with other international instruments and legal acts, ensuring thus the strengthening of national legislation in this domain.

5. The Program takes as a basis the commitments formulated in “European Moldova 2030” National Development Strategy, approved by Law no. 315/2022, including the objectives of Moldova – 2030 Agenda for Sustainable Development, ensuring the alignment to the following Sustainable Development Goals (SDGs):

1) SDG 16 „Promote peaceful and inclusive societies for sustainable development, provide access to justice for all”, with the global indicators (national targets):

a) significant decrease of illicit financial flows [...], strengthening the recovery and return of stolen assets (SDG 16.4);

b) significant decrease of corruption and bribery in all their forms (SDG 16.5);

c) development of efficient, accountable and transparent institutions at all levels (SDG 16.6);

d) ensuring a receptive, inclusive, participatory and representative decision-making process at all levels (SDG 16.7);

e) ensuring the public access to information and protection of fundamental freedoms, in accordance with the national legislation and international agreements (SDG 16.10);

2) SDG 5 „Achieve gender equality and empower all women and girls”.

6. “European Moldova 2030” National Development Strategy stipulates that good governance has a direct impact on the provision of qualitative and relevant services. Good governance stimulates the impact of policies that increase government transparency and efficiency, decrease corruption, promote economic freedom and strengthen social inclusion, focusing on women empowerment. To this extent, the Program is based on one of the principles that lays at the basis of the implementation of the above Strategy, namely “anchoring the sectoral policy documents for the implementation of this strategy with the principles (interdependence, equality and non-discrimination, participation and empowerment, accountability) and standards on human rights and gender equality” (8. Reporting procedures).

7. The Program also derives from the National Security Strategy of the Republic of Moldova, approved by Parliament Decision no. 391/2023, which has the objectives of increasing the capacity of the state to prevent and fight the materialization of risks to national security, and also to ensure the process of European integration and cooperation with partner countries. Thus, among the specific security objectives we find the strengthening of institutions and corruption fighting mechanisms.

8. This Program is a public policy document pursuing to establish a set of objectives and actions on good governance ensured by strengthening institutional integrity at a national level.

9. The obtaining of the status of candidate country to joining the European Union has determined the Government of the Republic of Moldova to initiate and develop the National Action Plan on the joining of the European Union by the Republic of Moldova for 2024–2027, which includes, in its chapter „Justice reform and fundamental rights”, one action relating to the “development and approval of the National program of integrity and anticorruption for 2024–2028” (action no. 22). Thus, the development and responsible implementation of the Program will strengthen the joint efforts and contribute to the process of fulfilling the commitments undertaken by the Republic of Moldova with the obtaining of such status.

10. The Program is correlated with the 9 measures proposed by the European Commission in its Note on the application of the Republic of Moldova for European Union membership. Of them, 4 measures relate to the integrity and anticorruption domains, as follows: finishing the essential stages of the justice system reform, launched recently, in all the institutions from the justice and criminal prosecution chain, in order to ensure the independence, integrity, efficiency, responsibility and transparency of such institutions (commitment 1); fulfilling the commitment to fight corruption at all the levels by taking decisive measures towards proactive and efficient investigations, as well as obtaining a credible balance of criminal prosecutions and convictions; substantial increase of the degree at which the recommendations of the National Anticorruption Centre are used (commitment 3); implementation of the “disoligarchizing” commitment by eliminating the excessive influence of private interests on the economic, political and public life (commitment 4); strengthening the fight against organized crime, based on some detailed evaluations of the threats, an increased cooperation with the EU regional partners and international partners, and better coordination of the law enforcement authorities, especially the institution of a legislative package on asset recovery and a comprehensive framework on fighting financial crime and money laundering (commitment 5).

11. This policy document is developed in accordance with Government Decision no. 386/2020 on planning, developing, approving, implementing, monitoring and evaluating public policy documents, and has a support the theory of change of the public policy documents, the ideas, initiatives and proposals of the stakeholders from the integrity and anticorruption domain.

12. The program is a strategic vision document pursuing the growth of welfare and quality of life of the citizens by means of corruption eradication and guaranteeing the rule of law. The objectives proposed in this Program will contribute to the accomplishment of the commitments undertaken by the Republic of Moldova towards the international community.

13. The Program and action Plan for its implementation are planned for a period of 5 years and pursue the cohesion between the stakeholders involved in the domain

relevant to corruption preventing and fighting, as well as the diminishing of the corruption phenomenon at a national level.

14. The Program was developed within a participatory process, with the involvement of all decision makers. The national entity having the role of coordination for the Program and Action Plan for its implementation shall consult with the associative and nongovernmental environment, academia and development partners to identify the most efficient tools and methods of coordination for the good implementation of this public policy document.

II. SITUATION ANALYSIS

Analytic synthesis of the corruption phenomenon

15. Corruption is recognized as a major contemporary problem undermining social development, affecting the rule of law, perpetuating inequality and increasing the distrust in state institutions. Despite the increase of the number of policies for corruption prevention and fighting in the last 3 decades, this problem remains notorious and difficult to measure and the impact of such policies is difficult to evaluate.

16. The corruption phenomenon stays constant in the Republic of Moldova, representing a threat for democracy, social equity and independent justice. Moreover, the corruption phenomenon affects the perspectives of the Republic of Moldova regarding the accession to the European Union, promotion of its foreign policy objectives and maintaining a good image in front of the development partners. Thus, the more and more large area, complexity and continuous diversification of the corruption forms impose the need, at a national level, to identify a complex strategic view of intervention in order to decrease corruption incidents as well as their effects.

17. The analysis of corruption phenomenon evolution in a context as that of the Republic of Moldova is a complex exercise, taking into account the quasi-general perception on corruption which exists in a significant part of the social life and economy, and the lack of disaggregated data. Nevertheless, the existing statistics offer a general perspective on the approached phenomenon and on the domains in which interventions are necessary.

18. The corruption perception index (CPI) reflects the level of corruption in public sector perceived by experts and businessmen and is calculated at a scale from 0 (total corruption) to 100 (total lack of corruption). In January 2023, Transparency International launched the CPI for 2022, and the Republic of Moldova got a score of 39 points, which places it on the 91st place of 180 countries included in the rating (for comparison – in 2021 the CPI score was of 36 points, and Moldova was placed on the 105th place of 180 countries).

19. The corruption perception index for 2022, published by Transparency International, shows that 131 states of the analysed 180 did not make significant progress in fighting corruption in the last 10 years, and the Republic of Moldova is not an exception. Nevertheless, table 1 shows the positive approach and evolution for our country with regards to corruption perception, which proves that the efforts made by the national public entities in the sphere of corruption prevention and fighting have a positive impact and need to be continues.

Table 1

Republic of Moldova in the CPI rating 2016–2022

Years	2016	2017	2018	2019	2020	2021	2022
Score	30	31	33	32	34	36	39
Place in the rating	123	122	117	120	115	105	91

Source: Corruption Perception Index 2022 (IPC 2022): <https://www.transparency.md/2023/01/31/3663/>

20. The Index of Public Integrity or IPI, published in 2021 by the European Research Centre for Anticorruption and State Building (ERCAS) evaluates the capacity of a society to control corruption and to make sure that the public resources are spent without corrupt practices. In 2021, the Republic of Moldova had an IPI score of 6.28/10, while at a world level it was of 60/114, and at a regional level – a general score of 8/12.

21. The performed evaluation shows that corruption in the Republic of Moldova is considered a serious problem by most of the population and businesses (approximately 3/4 of the respondents). The seriousness of the phenomenon is evaluated with 1.9 points by the population and business representatives (on a scale of 10 points, where 1 – corruption is a very serious problem in Moldova, 10 – corruption is not a problem at all in Moldova). Women consider at a large scale that corruption is a serious problem (78%, as compared to 73% of men). At the same time, the integrated indicator on intolerance towards corruption is increasing – from 53%, in 2017, to 57%, in 2021. Still, this increase is due to the economic entities which had, in 2017, an intolerance level of 61%, and in 2021 – of 72%, as among the population the level is decreasing – from 45% to 42%.

22. According to the Public Opinion Barometer performed by the Public Policy Institute, the corruption continues to cause concerns among the citizens. The share of citizens showing concerns was of 6.4% in 2023, which index decreased by approximately 2.2% as compared to 2019.

23. Speaking about the trust in law enforcement authorities of the Republic of Moldova, the data of the Public Opinion Barometer prove a stagnation in relation to the

3 analysed structures (National Anticorruption Centre, General Prosecutor Office and courts of law) and show that the citizens of the Republic of Moldova trust more the National Anticorruption Centre (4.6% in 2021 and 4.2% in 2023) in comparison with the other analysed structures.

24. In accordance with Law no. 1104/2002 on the National Anticorruption Centre, this institution performs the operational and strategic analysis of corruption acts, corruption related acts and corruptible facts. The strategic analysis on judicial practice in corruption cases and corruption related cases, developed by the National Anticorruption Centre in 2023 on the basis of the judicial decisions issued in 2022, was prepared on the basis of a set of indicators on the decisions taken by the courts, namely the sanctions applied in corruption cases, categories of subjects having committed corruption acts, duration of trial in corruption cases, etc. The results of the strategic analysis show that in 2022, the first instance courts of the Republic of Moldova issued 209 sentences in relation to 256 persons having committed, in total, 426 deeds (cases). In 274 cases (64%), the courts have taken conviction solutions, in 56 cases (13%) – acquittal solutions, and in 96 cases (23%) the courts ordered the termination of the criminal process.

25. The strategic analysis has proven that the highest rate of convictions (79%) relates to the corruption offences from the category of serious offences, followed by the rate of convictions in case of less serious offences (73%) and, accordingly, by the rate from the category of minor offences, which had the lowest conviction rate (12%). On the other side, the serious, less serious and minor offences committed in 2022 had an absolute conviction rate (100%), and an absolute rate of termination of the case and acquittal was registered in relation to the minor offences committed in 2005–2019 and examined in court in 2022. Among the factors favouring corruption, one could emphasize the high level of social acceptability of the corruption behaviour, as well as the low awareness raising of civil servants on ethics and integrity.

26. Public procurement represents a domain exposed to corruption risks. In the period 2019–2023, the National Anticorruption Centre examined, in total, 74 criminal cases on offences in the sphere of public procurement. Of them, 38 cases were discontinued, 16 were sent to other criminal prosecution authorities, while 12 cases were completed and sent to court. The data of the forensic and criminology information register of the Ministry of Internal Affairs show that only in one of 12 criminal cases sent to court a conviction sentence has been issued.

27. One corruption prevention measure specific to the Republic of Moldova is the corruption proofing of normative acts, representing a measure to control the integrity in public sector. According to the activity reports of the National Anticorruption Centre for 2020–2022, the Centre received for examination a total of 3707 drafts from public entities, with 2232 corruption proofing reports prepared and 1480 endorsements on draft normative acts sent. During the performance of the factual

evaluation of the drafts subjected to corruption proofing, in 2022 they identified 2555 corruption factors, by 132 corruption factors less as compared to those identified in 2021 and by 838 less than in 2020. At the same time, in 2022, the authors of the drafts accepted approximately 59% of the total recommendations submitted in the corruption proofing reports by the experts of the centre, as compared to 50% in 2021 and 71% in 2020.

28. Another proactive instrument to prevent corruption manifestations in the activity of public entities represent the evaluation of institutional integrity, which comprises the identification of corruption risks and analysis of factors generating them, as well as offering recommendations for their elimination. According to the Activity Report of the National Anticorruption Centre for 2022, the evaluation of institutional integrity has been done in relation to 8 public entities, in case of other 3 public entities the evaluation process is in course.

29. In the sphere of anticorruption education, with the involvement of all interested factors, 439 training activities and awareness raising campaigns in anticorruption education have been organized in 2022 (with 194 more activities as compared to 2021), in which 17746 persons participated (as compared to 8450 persons trained in 2021).

Table 2

Training and awareness raising activities in the areas of integrity and anticorruption

2021			2022		
Participants		Training and awareness raising activities	Participants		Training and awareness raising activities
Civil servants	7419	226	Civil servants	15242	402
Pupils and students	678	5 trainings (+2 trainings jointly with education directorates)	Pupils and students	2354	34
Private sector	176	2 trainings (+5 trainings jointly with LPAs)	Private sector	150	3
Other categories	177	2 trainings (+5 trainings jointly with LPAs/education directorates)	Other categories	-	-
Total	8450	245	Total	17746	439

Source: Report of activity of the National Anticorruption Centre

These results argue the need to continue the application of strategic intervention measures in the mentioned domains and to strengthen the integrity climate in the public sector.

30. The process of implementation of the National Strategy of Integrity and Anticorruption for 2017–2023, approved by Parliament Decision no. 56/2017, ensured the making of certain progresses in relation to: a) instituting and promoting the institutional integrity climate at a central and local level from the point of view of integrity policies provided by the Law of Integrity no. 82/2017; b) strengthening the national integrity system by creating the legal framework on the protection of whistleblowers in the public sector, expanded subsequently to the private sector, as well; c) granting to the Ombudsman the competence to protect the whistleblowers, based on the recommendations comprised in the Note of the Venice Commission and in accordance with the Paris Principles; d) development, within the Central Electoral Commission, of an information system on the financial control of political parties and electoral campaigns; e) development and promotion of a template code of ethics in business, etc.

Analysis of the non-fulfilled actions on the basis of the previous policy documents in the sphere of anticorruption

31. After the implementation of the National Strategy of Integrity and Anticorruption for 2017–2023 (NSIA) considerable improvements were registered in the development and application of the institutional integrity documents, which arguments the need to further promoting them in the future policy documents. The promotion of the 14 integrity policies has proven in time that this is an efficient exercise, disciplining and educating the civil servants in the spirit of integrity, especially taking into account the trends of the major fluctuation of human resources in the public sector.

32. The appreciation of the level of achievement of the objectives set by NSIA should be interconnected/correlated to the level of undertaking and implementation of the actions agreed jointly by the implementing public entities. Thus, in the process of monitoring and evaluation of the actions included in the action plans for the implementation of NSIA, a series of actions were emphasized as „partially fulfilled” and „non-fulfilled” or as actions for which the degree of fulfilment is not certain. Among the remaining actions stated and examined in detailed in the last report of monitoring and evaluation of NSIA implementation (for quarter I of 2023) the following are remarkable:

1) *Creation, in the Republic of Moldova, of specialized courts or panels of judges for the examination of cases on corruption acts.* In this sense, the monitoring and evaluation report on the implementation of NSIA for quarter I of 2023 expressly

stipulates: „In the process of reform of the anticorruption system of Ukraine such institutions have been created, and the initiative has also been approved by the Venice Commission. At the same time, the actions have been previously encouraged by the Supreme Court of Justice, but not progress has been achieved. In this context, the institution of specialized courts/panels of judges and their provision with enough human, technical and financial resources are still unachieved commitments.”

2) ***Approval of the norms of professional ethics and conduct for the MPs.*** The establishing and achievement of these norms will contribute to strengthening the trust of the population on the basis of the declared commitment to coordinate the activity of Parliament members primarily to serve the public interest, with the observance of the integrity principles. It is important to draw the attention to the fact that the Group of States against Corruption (GRECO) emphasized, during round IV of evaluation of the Republic of Moldova on corruption prevention among Parliament members, judges and prosecutors, that the Republic of Moldova should make significant progresses to reach an acceptable level of conformity and criticized the fact that no code of conduct has been approved for the MPs and no measures have been taken to prevent various forms of conflicts of interests among MPs.

3) ***Creation of an electronic platform of the Government with a primary objective to facilitate the lawmaking process*** – this would include the pathway of a draft normative act, at all stages of the legislative process, in a single system, which would be accessible for the subjects involved in the legislative process, including for the public.

4) ***Revision of the legislation in order to establish proportional and fair liability for the infringement of the rules for financing political parties and electoral campaigns.***

33. In an alternative report on the evaluation of NSIA and Action Plan for the period 2017–2020, developed in 2022 by a group of experts from the Centre for Corruption Analysis and Prevention (CAPC), they also emphasized that:

1) the instruments conceived to ensure efficiency and contribute to the increase of integrity among prosecutors and judges were not fully applied. The instruments for lifestyle monitoring and polygraph testing at the appointment in office are still insufficiently applied;

2) the applied sanctions prove that they do not ensure the discouraging effect as they lack dissuasive nature and are expedite, and also because the complementary sanctions depriving a person from the right of holding a public office or meant to compensate the damages are rarely applied;

3) the investigation and penalizing of the infringements of the rules for financing political parties and electoral campaigns, as well as the case of electorate corruption are not found in the law enforcement statistics;

4) the lack of a public annual report on the analysis of profitability indicators of the fully or majority state-owned/municipal enterprises shows a lack of transparency and creates difficulties for monitoring by the civil society.

34. The findings from the evaluation reports on NSIA implementation, as well as of the best practices promoted by NSIA (especially on establishing the institutional integrity climate) contributed inclusively to the formulation of new priorities within the National Program on Integrity and Anticorruption for the following 5 years.

35. The strengthening of integrity in the public sector at a central and local level, ensured by the cultivation of a climate of zero tolerance to corruption and by increasing the control on the responsibility, transparency and resistance of civil servants in front on corruption risks (namely by the continuous and constant promotion of the 14 integrity policies), remains a national priority, which will guarantee a long-term exercise and strengthen the spirit of social responsibility and professional ethics. International practice has proven that topics as professional ethics (deontology), observance of the legal regime of conflicts of interests, observance of the legal regime of gifts, non-admission of favouritism, etc. are and should be periodically evaluated, updated and promoted to become well-known instruments, under procedural aspect, for the public sector employees and not only. An example of continuous and efficient promotion of integrity policies is given by the findings of the “Impact assessment study on the National Strategy on Integrity and Anticorruption” performed in 2021 by the Centre for Sociological, Political-scientific and Psychological Analysis CIVIS, which present the following data: „Approximately 4 of 5 respondents (83% as compared to 77% in 2017) consider it correct that a civil servant should always declare a conflict of interest. This opinion was preferentially expressed by men (89% as compared to 79% of women), people aged less than 51 years, with a high level of education, from urban area [...]. The deepened analysis shows a high level of knowledge of legal/illegal or correct/incorrect situations regarding the observance of the gift regime. The value of the integrated indicator shows that 73% of civil servants (at the same level with 2017) gave correct answers to all the possible corruption situations in the process of the gift regime observance [...].” Consequently, it is imperious to continue the active promotion of institutional integrity policies at a national level in order to ensure an open, transparent governance which is aware of its role in relation to the citizens. Additionally, this Program approaches the issue of ensuring the transparency in the process of political party financing, as well as appreciates the importance of creating, in the Republic of Moldova, of specialized courts for the examination of the files on corruption acts and the importance of strengthening the justice system.

III. INTERNATIONAL STANDARDS AND BEST PRACTICE EXAMPLES

36. During the development of this policy document, the commitments of the Republic of Moldova within the conventions to which it is a party and the alignment to the standards declared by such conventions were also taken into consideration. Among these we mention the United Nations Convention against Corruption (ratified by Law no. 158/2007), the conventions of the Council of Europe (Criminal Convention on Corruption, ratified by Law no. 428/2003; Additional Protocol to the Criminal Convention on Corruption, ratified by Law no. 157/2007; Civil Convention on Corruption, ratified by Law no. 542/2003), as well as the resolutions of the Committee of Ministers of the Council of Europe (Resolution (97) 24 on the 20 guiding principles for the fight against corruption; Recommendation R (2000) 10 for the member states on the codes of conduct for civil servants; recommendations based on evaluations and monitoring, formulated by GRECO).

37. At the same time, in the process of analysis and research of the best practices in the sphere of anticorruption policies, several examples of such practices of the following states: Bulgaria, Croatia, Estonia, Lithuania and Romania were identified. All these countries have developed strategies or action plans guiding their efforts in the fight against corruption. These documents offer a clear framework and specific directions for strengthening integrity, increasing transparency and fighting corruption on various dimensions. Thus, an obvious trend in all the analysed states consists in strengthening the institutional and normative framework necessary for corruption prevention and fighting. It includes strengthening the anticorruption bodies and units, as well as the improvement of the administrative capacity and of the supervision and penalizing systems. Another trend is emphasized in the importance of increasing the transparency and openness in the activity of public authorities. This involves ensuring access to information, publication of relevant data and promotion of a transparency culture in the public institutions also in the process of public procurements.

38. In most analysed policy documents, special focus is made on raising the public awareness on corruption and involving the civil society in the efforts of corruption prevention and fighting. This includes information campaigns, anticorruption education and the involvement of non-government organizations and citizens in the monitoring and reporting of corruption acts.

39. Likewise, the practice of the states from the region emphasizes the importance of international cooperation and of undertaking the recommendations and evaluations made by international organizations, such as GRECO and ACN/OECD (Anticorruption Network for East Europe and central Asia of the Organization for Economic Cooperation and Development). This strategic approach proves the will to align to the international standards and practices in the sphere of corruption prevention

and fighting, and the joint trends underline the commitment of the countries to promote good governance, transparency and integrity in the public administration, and to fight against corruption. Thus, the GRECO commitments, to which the Republic of Moldova aligned itself, as well as the recommendations formulated on the basis of the last evaluations made by GRECO and by the evaluation exercises of ACN/OECD were taken into consideration during the drafting of the Program.

40. The Program objectives were also aligned to those of other sectoral policy documents regarding integrity and anticorruption, such as the Strategy for ensuring the independence and integrity of the justice sector for 2022–2025, National Program of criminal assets recovery for 2023–2027 and Action Plan for its implementation, national Strategy for the prevention and fighting of money laundering and terrorist financing for 2020–2025, National program of development of the public procurement system for 2023–2026.

IV. GENERAL OBJECTIVES AND SPECIFIC OBJECTIVES

41. The Program represents a continuity of the processes launched and implemented previously based on NSIA, an important anticorruption policy document for the decrease of the corruption phenomenon, with a complex and multidimensional approach. By setting the 4 general objectives, the Program aims to continue decreasing corruption and amplifying the degree of integrity in the public and private sector. These objectives present another approach of the priority setting process, namely an approach based on impact by means of evidence, strong institutions, informed and active society, as well as by means of strengthened efficient reaction capacities. This approach puts in the centre of the change the integrity promotion and corruption fighting system, starting from the lessons learned, which show the need for a fast adjustment of the normative framework to the European and international standards, which would facilitate the prompt reaction of the system to the improvement of the capacity to fight against corruption by monitoring the observance of anticorruption standards.

42. The change paradigm proposed in this Program comprises intervention on each priority problem under the following aspects: 1) normative framework; 2) investments in staff training and motivation, so that the staff acts efficiently with a view to observing the anticorruption standards; 3) new and efficient approaches, based on evidence, in monitoring and evaluating the interventions in the sphere of integrity and anticorruption.

43. The general and specific objectives were established as a result of a broad consultation process with a view to identifying the priority domains of intervention in the integrity and anticorruption policy.

44. General objective 1. Development and implementation of integrity standards in public sector

Public integrity refers to the full observance of a set of common values, principles and ethical norms with a view to defending the public interest and to making it a priority in relation to the private interests. The Republic of Moldova has made considerable efforts with a view to strengthening the public integrity by approving some essential normative acts relating to ensuring the integrity, nevertheless, the empirical data continue to show that the corruption phenomenon is enrooted strongly enough in the political life and in the society, in general, affecting the quality of life in the country. Besides the existing legal mechanisms, this aspect deserves to be constantly approached, until the alignment to the best standards in the sphere of public integrity. The attainment of this objective is possible by: improving the standards of behavioural integrity in the public sector; strengthening the integrity climate within the public entities by efficiently and conscientiously fulfilling the integrity standards; instituting the office of integrity counsellor in the public institutions; promoting policies and procedures for the transparent and responsible management of public property, etc.

Specific objective 1.1. Strengthening the integrity climate within the public entities by efficiently and conscientiously fulfilling the integrity standards, till 2028.

Specific objective 1.2. Ensuring an open governance and the observance of transparency in decision making, till 2028.

Specific objective 1.3. Transparent and responsible management of public equity, till 2028.

Specific objective 1.4. Strengthening the integrity and decreasing corruption in the electoral process, till 2028.

Expected results:

1) due implementation, according to the established progress indicators, of the objectives and measures proposed to strengthen the integrity of the public sector;

2) promotion of transparency, responsibility and ethics in the public sector, in the management of public property and in the electoral process.

45. General objective 2. Increasing the efficiency of the measures for corruption prevention and fighting and ensuring the unavoidability of penalties for corruption offences

The criminal penalty is neither goal in itself, nor a result indicator, but it represents an instrument restoring social fairness. The public statistical data, as well as the research performed on this topic show that petty corruption is more investigated than large scale corruption. The conviction rate in first court instances represents approximately 57%, and the acquittal rate – around 37%. The acquittal rate in corruption cases is 12 times higher than the average acquittal rate in the country (3%). There are many explanations for this low performance, for example the lack of

capacities to investigate large corruption acts, as those are, by definition, complex cases, lack of resources to contract experts in order to offer support in complicated investigations, etc. The stated objective may be attained by improving the institutional framework with a view to increasing the efficiency of investigation and criminal prosecution of corruption cases, by increasing the efficiency of the process of examination in trial and penalization of corruption cases, by strengthening the integrity of institutions in the justice sector involved in the investigation, criminal prosecution and court trials of corruption cases. The attainment of the objective will ensure the continuous development of international cooperation in the sphere of integrity, corruption prevention and fighting.

Specific objective 2.1. Increasing the efficiency of implementation of corruption prevention measures, till 2028.

Specific objective 2.2. Improving the institutional framework with a view to increasing the efficiency of investigation and criminal prosecution of corruption cases, till 2028.

Specific objective 2.3. Increasing the efficiency of the process of examination in trial and penalization of corruption cases, till 2026.

Specific objective 2.4. Strengthening the integrity of institutions in the justice sector involved in the investigation, criminal prosecution and court trials of corruption cases, till 2028.

Specific objective 2.5. Ensuring and continuous development of international cooperation in the sphere of integrity, corruption prevention and fighting, till 2028.

The expected result consists in the percentage increase of the number of corruption cases sent to trial and with conviction sentences (disaggregated data according to the level of corruption – large, systemic and petty, as well as by investigating institutions).

46. General objective 3. Cultivation of integrity and diminishing corruption acts in the private sector, including in the fully or majority state-owned entities

Many state and municipal enterprises do not have efficient mechanisms to ensure institutional integrity. The corruption „costs” are quite high in the private sector, as well, which affects the quality of goods and services provided to the population, the competitiveness and rules of market economy, the investment process and the national public budget. The economic entities and civil servants establish illegal relations in order to obtain public procurement contracts favourable to their own interests. The report of the International Monetary Fund of 2022, chapter „State-owned enterprises” mentions: „The sector suffers from weak performance associated with deficit governance and supervision, non-commercial mandates and low capacities and independence of the supervisory boards.” Although many procedures for the evaluation of corruption risks in the activity of state and municipal enterprises have been started,

it was found that this is a high corruption risk sector due to several factors: defective or too general normative framework, non-compliant decisions of the founders, etc. The fulfilment of the mentioned objective will ensure the strengthening of the transparency standards in the sphere of entrepreneurship, promoting and ensuring the integrity in the private sector and development of the transparency mechanism in offering state aid.

Specific objective 3.1. Strengthening the transparency and integrity standards in the fully or majority state-owned entities, till 2028.

Specific objective 3.2. Promoting and ensuring the integrity in the private sector, till 2028.

Specific objective 3.3. Increasing the efficiency of the transparency mechanism in offering state aid, till 2028.

47. General objective 4. Cultivation of intolerance towards corruption acts and encouraging the reporting of corruption acts and illegal practices

Corruption preventing and fighting, at all levels, represents a fundamental prerequisite for the strengthening of democratic mechanisms, increase of trust in the act of justice, correct appreciation of social values and, especially, for the adequate operation of the state institutions. The integrity principles may not be transmitted to the population only by editing brochures and organizing events, they have to be transmitted by training, by own example of integrity. The fulfilment of the mentioned objective will ensure both the intolerance to corruption acts and to corruption related acts among the population, and the increase of the civil engagement by reporting corruption acts, corruption related acts and illegal practices.

Specific objective 4.1. Strengthening the intolerance towards corruption acts and related acts among the population, till 2028.

Specific objective 4.2. Increasing civic engagement by means of reporting by the citizens of corruption acts, corruption related acts and illegal practices, till 2028.

Expected results:

- 1) percentage increase of the number of citizens stating that the corruption acts and corruption related acts are not acceptable and opposing to such phenomenon;
- 2) increase of the number of reports of corruption acts and corruption related acts.

48. The analysis of disaggregated data may ensure clarity on the way in which the perception and attitudes of the persons vary depending on various factors, such as gender, age, occupation, environment (urban or rural). These data may offer useful information for the development of new policy documents and awareness raising and social mobilization campaigns against corruption acts.

V. IMPACT

49. For the purpose of attaining the general and specific objectives set out in the Program, the implementing public entities shall present a consequent strategic approach, the technical-financial and human resources planned and allocated to guarantee a successful implementation of the proposed measures, as well as the Action Plan for the implementation of the Program (hereinafter – the *Action Plan*).

50. The general objectives were established on the basis of a joint analysis of the middle-term and long-term trends specific to the corruption phenomenon in our society, and of the problems perpetuating such phenomenon and creating high corruptibility risks.

51. The program aims a measurable impact of all progresses recorded and reported by the public entities responsible for Program implementation. The priority and final beneficiaries of the Program are the citizens of the Republic of Moldova, foreign citizens or refugees with the right of temporary or permanent stay or with permanent residence in the Republic of Moldova, as well as the legal persons performing activity on the territory of the Republic of Moldova.

52. When the effects of the corruption phenomenon are being approached, the target group may not be identified only with a certain category of persons. Corruption not only affects the direct subject on which the first effects expand, but the population in general, which creates its perceptions on the basis of the experience of close people, as well as on the basis of the communication from the social environment and media. In this sense, the alternative evaluations on the degree of implementation of the actions set out in the Action Plan are encouraged and supported. Any evaluation made by other stakeholders than those directly identified in this policy document as responsible for the process of monitoring and evaluation of the Program implementation will increase the attention on the needs for intervention and revision of certain priorities/directions set out in the Program. In this context, the role of the civil society is extremely important in the process of monitoring the degree of implementation of the Program, as well as in the presentation of surveys/data/evaluations on the level of perception of the corruption phenomenon in our society. This mechanism increases the degree of transparency of corruption prevention and fighting at a national level, establishing, at the same time, the parties of the society which are vulnerable to corruption acts.

53. The impact indicators and targets to be attained according to the objectives described in the Program are given in Table 3.

Impact indicators of the public policy

<p>General objective 1. Development and implementation of integrity standards in public sector</p> <p><i>Specific objective 1.1.</i> Strengthening the integrity climate within the public entities by efficiently and conscientiously fulfilling the integrity standards, till 2028.</p> <p><i>Specific objective 1.2.</i> Ensuring an open governance and the observance of transparency in decision making, till 2028.</p> <p><i>Specific objective 1.3.</i> Transparent and responsible management of public equity, till 2028.</p> <p><i>Specific objective 1.4.</i> Strengthening the integrity and decreasing corruption in the electoral process, till 2028.</p> <p>Impact indicators:</p> <ul style="list-style-type: none"> – share of civil servants trained regarding the professional integrity policies (disaggregated data by public entities), till 2028, in %; – share of civil servants observing the institutional integrity standards, till 2028, in %; – share of at least 70% of civil servants having submitted the declaration of assets and personal interests without discrepancies between assets and expenses; – share of at least 90% of entities having established policies and procedures of reporting and protection of whistleblowers; – share of public entities which are more efficient and transparent at all levels, in %; – share of citizens and business representatives affirming that public procurements are done in a transparent way, in %; – increase of the level of trust of the citizens in a transparent and corruption-free electoral process by up to 20%, till 2028. <p>Targets to be attained:</p> <ul style="list-style-type: none"> – increase by 7% of the trust of citizens in the public sector, till 2026; – increase by 15% of the trust of citizens in the public sector, till 2028
<p>General objective 2. Increasing the efficiency of the measures for corruption prevention and fighting and ensuring the unavailability of penalties for corruption offences</p> <p><i>Specific objective 2.1.</i> Increasing the efficiency of implementation of corruption prevention measures, till 2028.</p> <p><i>Specific objective 2.2.</i> Improving the institutional framework with a view to increasing the efficiency of investigation and criminal prosecution of corruption cases, till 2028.</p> <p><i>Specific objective 2.3.</i> Increasing the efficiency of the process of examination in trial and penalization of corruption cases, till 2026.</p> <p><i>Specific objective 2.4.</i> Strengthening the integrity of institutions in the justice sector involved in the investigation, criminal prosecution and court trials of corruption cases, till 2028.</p> <p><i>Specific objective 2.5.</i> Ensuring and continuous development of international cooperation in the sphere of integrity, corruption prevention and fighting, till 2028.</p>

Impact indicators:

- annually increasing share of public entities subjected to institutional integrity evaluation, in %, till 2028;
- increasing share of corruption files investigated by the National Anticorruption Centre and Anticorruption Prosecutor Office, with the sending to court, and number of completed files, till 2028;
- share of corruption offences with convicting sentences (disaggregated data by type of corruption; large, petty, systemic);
- share of corruption offences (disaggregated data by type of corruption; large, petty, systemic) examined by a court specialized in the examination of corruption and related files, in %, till 2028;
- share of citizens and business representatives considering that there is no corruption in the justice sector institutions (disaggregated data by gender, type of institution), in %, till 2028;
- increase of the number of investigations of complex and cross-border corruption and related offences (including the increase of number of delegations on criminal assets recovery), in %, till 2028;
- growing value of foreign financial and technical assistance on strengthening the capacities to prevent and fight corruption and strengthen the integrity climate at a national level, till 2028.

Targets to be attained:

- increase by 10% of corruption cases with convicting sentences, till 2026;
- increase by 25% of corruption cases with convicting sentences, till 2028

General objective 3. Cultivation of integrity and diminishing corruption acts in the private sector, including in the fully or majority state-owned entities

Specific objective 3.1. Strengthening the transparency and integrity standards in the fully or majority state-owned entities, till 2028.

Specific objective 3.2. Promoting and ensuring the integrity in the private sector, till 2028.

Specific objective 3.3. Increasing the efficiency of the transparency mechanism in offering state aid, till 2028.

Impact indicators:

- improved integrity climate in the business environment, till 2028;
- decrease of the number of corruption and corruption related incidents in the private sector, according to public surveys, till 2028;
- share of corruption cases and abuses in allocating state aid, in %;
- more transparent mechanism of offering state aid/subsidies in agriculture, till 2028.

Targets to be attained:

- increase of the degree of transparency in case of 70% of fully or majority state-owned entities, till 2028;
- number of corruption related incidents in the private sector decreased by 25%, till 2028

General objective 4. Cultivation of intolerance towards corruption acts and encouraging the reporting of corruption acts and illegal practices

Specific objective 4.1. Strengthening the intolerance towards corruption acts and related acts among the population, till 2028.

Specific objective 4.2. Increasing civic engagement by means of reporting by the citizens of corruption acts, corruption related acts and illegal practices, till 2028.

Impact indicators:

- increasing share of citizens declaring that corruption is not acceptable in %, till 2028;
- increasing share of citizens who are ready to oppose corruption by denouncing it, in %, till 2028;
- increasing share of informed citizens with a view to a better understanding of corruption consequences and with a view to cultivating intolerance towards such phenomenon, in %, till 2028;
- increasing number of reports on corruption acts, corruption related acts and illegal practices, in %, till 2028;
- increasing share of criminal files on corruption started on the basis of complaints and denunciations, in %, till 2028.

Targets to be attained:

- perception of citizens towards the corruption phenomenon improved by 7% till 2026;
- perception of citizens towards the corruption phenomenon improved by 15% till 2028

54. The impact of the Program may be monitored on the basis of the monitoring indicators stated in the Action Plan, for each planned action, as well as at the level of general objectives, as follows:

1) Efficient penalizing of corruption acts. Penalizing corruption acts is not necessarily a goal in itself but it is certainly a relevant indicator for the fight against corruption phenomenon and for the establishment of social fairness. When corruption cases are being investigated, it is natural that they are completed by the application of constraint measures corresponding to the committed deed and caused damage. This is why the percentage of cases with convicting sentences is an impact indicator to appreciate at what extent the investigated cases are handled accordingly by the law enforcement authorities and the evidence is accurately appreciated in court. This indicator will allow an objective analysis of the efficiency of criminal prosecution authorities in the investigation of corruption cases, as well as the appreciation of the objectiveness of judging the case in court in strict conformity with the criminal legislation.

2) Decrease of corruption perception in the public sector. An indicator which would clearly reflect whether the actions undertaken by the public entities by means of their commitment to fulfil the strategic measures proposed by the Program have effect is the increase of the Corruption Perception Index (CPI) performed by Transparency International. Any result of this index will give a clear message on the effects of undertaken measures. CPI is an index based on the analysis of data on corruption taken from specialized surveys done by several reputable institutions. Relevant indicators would be also the governance indicators of the World Bank, which represent a series of measurements used to evaluate the governance performance in various countries, one of the components being corruption control, measuring the degree of corruption in the public sector and in the society, in general.

3) WJP Rule of Law Index. This index analyses a series of essential domains for the rule of law, such as fundamental rights, public order and security, criminal justice, open governance and correctness of administrative processes. The corruption indicator is a component of this index and measures the degree of corruption in a country based on the data and perceptions collected from the citizens of that country and analysing corruption in the public sector and in the society, in general.

4) Openness of the citizens and business representatives towards the immediate reporting of corruption acts and corruption related acts. The increase of the number of reporting of corruption acts would provide relevant information on how open is the wide public in this regard. This indicator gives us a clear perspective on the trust of the citizens in the law enforcement authorities. The more reports on corruption acts, the higher the probability that they will be investigated and penalized, which would lead to the decrease of corruption risks and diminution of this phenomenon, in general. At the same time, this indicator may be used to identify the domains in which increased attention and efforts are necessary to improve transparency and integrity and to evaluate the impact of the applied measures for corruption prevention and fighting.

VI. COST ESTIMATION

55. The efficient implementation of the Program, in general, and of the Action Plan, in particular, which reflects all the actions and measures to be undertaken, is conditioned by an objective financial planning, by a correct estimation of the costs of actions and by the identification of financing sources, which are formed from the funds of the state budget, from the resources offered by the development partners, and from other legal financial means. The financial means meant for the performance of the activities, the costs of which are covered from the state budget, as well as the financial means offered by international organizations shall be used in a transparent way, with annual adjustment depending on the means provided in the middle-term budgetary framework for such periods, according to the priorities and needs of the implementing public entities.

56. The support of development partners in the implementation of this Program and Action Plan is important and essential, taking into account the limited budgetary resources. By a consolidated effort, the implementation of the set objectives and planned activities may be speeded up.

57. The costs of the actions proposed for the implementation of the Program and Action Plan are estimated to approximately MDL 110,397.8 thousand, which will be covered from the state budget, as well as by accessing foreign assistance from donors and development partners (table 4). The costs for training, knowledge transfer,

overtaking of experience, studies, research and analysis will be covered from the financial means of the state budget and from those allocated by donors.

Table 4

Estimative Program implementation costs

Specific objectives	Total costs	Costs per years (thousand MDL)				
		2024	2025	2026	2027	2028
1.1. Strengthening the integrity climate within the public entities by efficiently and conscientiously fulfilling the integrity standards	2,728.6	2,728.6	0.0	0.0	0.0	0.0
1.2. Ensuring an open governance and the observance of transparency in decision making	139.2	0.0	0.0	0.0	139.2	0.0
1.3. Transparent and responsible management of public property	0.0	0.0	0.0	0.0	0.0	0.0
1.4. Strengthening the integrity and decreasing corruption in the electoral process	64.2	64.2	0.0	0.0	0.0	0.0
2.1. Increasing the efficiency of implementation of corruption prevention measures	42,297.8	0.0	6,482.6	12,031.2	11,892.0	11,892.0
2.2. Improving the institutional framework with a view to increasing the efficiency of investigation and criminal prosecution of corruption cases	37,611.2	0.0	5,211.2	10,800.0	10,800.0	10,800.0
2.3. Increasing the efficiency of the process of examination in trial and penalization of corruption cases	22,940.7	0.0	6,470.7	5,490.0	5,490.0	5,490.0
2.4. Strengthening the integrity of institutions in the justice sector involved in the investigation, criminal prosecution and court trials of corruption cases	0.0	0.0	0.0	0.0	0.0	0.0

2.5. Ensuring and continuous development of international cooperation in the sphere of integrity, corruption prevention and fighting	337.6	0.0	84.4	84.4	84.4	84.4
3.1. Strengthening the transparency and integrity standards in the fully or majority state-owned entities	133.8	0.0	133.8	0.0	0.0	0.0
3.2. Promoting and ensuring the integrity in the private sector	191.6	0.0	110.6	27.0	27.0	27.0
3.3. Increasing the efficiency of the transparency mechanism in offering state aid	69.6	0.0	0.0	0.0	69.6	0.0
4.1. Strengthening the intolerance towards corruption acts and related acts among the population	3,242.7	0.0	788.4	818.1	818.1	818.1
4.2. Increasing the civic engagement through reporting by the citizens of corruption acts, corruption related acts and illegal practices	640.8	0.0	296.8	308.0	18.0	18.0
TOTAL	11,0397.8	2,792.7	19,578.5	29,558.7	29,338.3	29,129.5

58. The Program implementation will be done, inclusively through the following budgetary programs/subprograms:

- 1) program 35 „Internal affairs”, with the subprograms:
 - a) subprogram 3501 „Policies and management in the sphere of internal affairs”;
 - b) subprogram 3502 „Public order and security”;
 - c) subprogram 3505 „Support services in the sphere of internal affair”;
 - d) subprogram 3507 „Applied scientific research in the sphere of internal affairs”;
- 2) program 40 „Justice”.

VII. IMPLEMENTATION RISKS

59. The successful implementation of the Program may be affected by a series of risks. In this sense, a set of measures has been identified to mitigate the risks, meant to

decrease the impact and probability of non-fulfilment of the proposed actions, which measures are presented in table 5.

Table 5

Risks	Impact	Probability	Solution
Delays in the implementation of the actions included in the Action Plan	High	High	Monitoring the progress of activities and their revision depending on the progress to ensure the fulfilment of actions within the established term
Lack of a clear methodology of organization and performance of the process of monitoring and evaluation of actions included in the Action Plan	High	High	Development of a clear monitoring and evaluation methodology, technologizing, as the case may be, some parts in the process, so that the evaluation of indicators is not only a subjective and technical one. Use of the indicators set out in the Program and Action Plan during the process of monitoring and evaluation
Delays in promoting some draft normative acts due to possible differences between the implementing public entities	High		Creation of interinstitutional working groups and joint promotion of some draft normative acts. Establishing a priority list of normative acts to be approved by the Government and adopted by the Parliament, especially those deriving from the conditionalities of the European Union regarding corruption prevention and fighting
Limited capacities of drawing foreign financial resources necessary for the implementation of the actions included in the Action Plan without coverage from the state budget and insufficient financial resources for the implementation of all the planned actions	High	High	Training, involvement of dedicated staff and application of efficient methods to draw foreign funds and to ensure a strict control on their execution, in order to cover the needs from the Action Plan
Resistance to change, to the use of new information	High	High	Intensive and constant training of staff.

technologies, to the undertaking of a more proactive role in the fulfilment of functional competences, within the public system			Making mandatory the use of informational technologies for the representatives of the public sector. Exchange of experience with other countries (by organizing study visits, joint trainings). Merit-based promotion of the staff undertaking changes and attaining visible results, for short and medium term, in the use of information technologies
Quasi-general perception of the citizens towards the lack of reaction or towards the lack of performance of the authorities responsible for corruption prevention and fighting	Medium	High	Proactive communication and intense promotion of the results, performances of the responsible authorities, in a language as accessible to the public as possible. Organization of the events of interaction with the citizens by means of various campaigns, including of nonformal/informal events
Political instability at a national level, which may generate a lack of continuity in the implementation of the strategic anticorruption measures	Medium	Medium	An anticorruption program is not a political instrument for a moment, it is a medium-term commitment, which is independent of the evolution and activities of the political class. The fight against corruption should remain a priority for any political class
Regional geopolitical situation and ensuring national security (external risk)	High	Medium	The continuation of the actions of war on the territory of Ukraine impacts the entire territory of the Republic of Moldova (including the settlements from the left bank of Nistru and Bender municipality), causing insecurity and instability for the operation of the state. The elimination or mitigation of this risk exceeds the capacities of the implementing public entities. The diminution of this risk directly depends on the global actions focused on the cessation of the war actions

VIII. RESPONSIBLE AUTHORITIES AND INSTITUTIONS

60. The success of prevention and fighting against the corruption phenomenon is based on the proactive actions of all the public entities meant to condemn and react in order to suppress such phenomenon. Thus, to guarantee an efficient anticorruption management, it is necessary that the managers of public entities understand the importance of institutional integrity and act in this direction by: systemic evaluation of the implementation and observance of the integrity policies regulated by the Law of integrity no. 82/2017; ensuring an efficient and safe reporting mechanism for the whistleblowers, regulated and instituted at the level of each entity; systematic informing of the employees on the norms of ethics and professional conduct; ensuring a transparent internal management and the observance of the meritocracy principle during the promotion in public office, etc. The observance of all the legal requirements relating to institutional integrity should be a strategic objective included in the institutional development plans of the public entities. This would ensure a good fulfilment of the actions set out in the Program.

61. The public entities responsible for the implementation of the actions are specified in the Action Plan. At the same time, the representatives of the private sector are encouraged to report on the measures implemented in accordance with the third general objective of the Program, as this shall ensure a balanced and efficient fulfilment of the strategic measures at a sectoral level.

62. The following authorities and institutions will contribute to the implementation of the Program:

Table 6

No.	Responsible authorities/institutions	Role in the implementation of the Program
1	National Anticorruption Centre	<ul style="list-style-type: none"> – Ensures the secretariat of the Monitoring Group; – performs the monitoring and evaluation of the Program and Action Plan; – performs the collection and analysis of statistical data; – prepares quarterly and annual progress reports on the implementation of the Program and Action Plan; – offers the necessary information and technical support in the process of Program implementation; – performs activities of prevention, awareness raising, education and fighting against corruption acts, corruption related acts and corruptible deeds

2	Profiling parliamentary committee	<ul style="list-style-type: none"> – Coordinates the process of Program implementation; – examines draft normative acts and legislative proposals with a view to preparing reports or endorsement noted, debates and decides on other issues; – delegates a member to the Monitoring Group, which shall ensure the parliamentary control and inform the committee on the progresses and deficiencies registered during the fulfilment of the Program
	Parliament	<ul style="list-style-type: none"> – Holds the parliamentary control on the implementation of laws and functioning of independent and regulatory institutions; – Adopts the Program and Action Plan
3	State Chancellery	<ul style="list-style-type: none"> – Correlates the national legal framework with the requirements of the European Union legislation on offering the state aid; – offers methodological and organizational support in the development of a study on the need to regulate the lobby activity in the Republic of Moldova, with the amendment, as the case may be, of the normative framework
4	General Prosecutor Office, Anticorruption Prosecutor Office	<ul style="list-style-type: none"> – Contribute to the improvement of the institutional framework of the Anticorruption Prosecutor Office with a view to increase the efficiency of investigation and criminal prosecution of corruption cases; – develop the professional competences of prosecutors on the criminal prosecution of corruption cases; – maintain the transparency in the communication with the public on the investigation and criminal prosecution of corruption cases
5	Ministry of Justice	<ul style="list-style-type: none"> – Revises the proposals on legislation amendment for the improvement of the integrity and anticorruption domain; – submits to the Parliament proposals to amend the legislation
6	Higher Council of Magistrates	<ul style="list-style-type: none"> – Contributes to increasing the efficiency of the process of examination in trial and penalization of corruption cases among judges and prosecutors; – delegates a member to the Monitoring Group, which shall ensure the parliamentary control and inform the Council on the progresses and deficiencies registered during the fulfilment of the Program
7	Intelligence Service	<ul style="list-style-type: none"> – Offers the necessary information support in the fight against corruption

8	Office of the Ombudsman	<ul style="list-style-type: none"> – Contributes to the defence of whistleblowers in accordance with the provisions of the Law no. 52/2014 on the Ombudsman; – examines the cases of the whistleblowers and the protection of whistleblowers
9	Central Electoral Commission	<ul style="list-style-type: none"> – Perform activities of integrity strengthening and corruption diminishing in the electoral process; – presents annually to the Parliament the report on financing political parties and electoral campaigns
10	National Integrity Authority	<ul style="list-style-type: none"> – Ensures the integrity in the exercise of public office or public dignitary office; – ensures corruption prevention by performing the control of assets and personal interests and of the observance of the legal regime of conflicts of interests, incompatibilities, restrictions and limitations
11	Public Institution „Electronic Governance Agency”	<ul style="list-style-type: none"> – Ensures the training process in the sphere of integrity and anticorruption through the e-Learning platform („Integrity and anticorruption” course); – updates the training course on the e-Learning platform
12	Public Property Agency	<ul style="list-style-type: none"> – Contributes to strengthening the transparency and integrity standards in the fully or majority state-owned entities; – monitors the implementation of the actions meant to decrease the risks of fraud and corruption identified in the Risk register of the fully or majority state-owned enterprises; – ensures the implementation of the transparency requirements according to the provisions of the legislation, as well as of the Corporate Governance Code of public enterprises
13	Public procurement Agency	<ul style="list-style-type: none"> – Develops and ensures the operability of the electronic system for the entire public procurement cycle; – makes efficient the common public procurement process
14	Central public authorities	<ul style="list-style-type: none"> – Integrate in the sectoral policy documents the actions from the Action Plan relating to them; – contribute to the increase of the degree of awareness on the corruption phenomenon among the population; – report the progresses in the fulfilment of the Action Plan
15	Local public authorities	<ul style="list-style-type: none"> – Offer support in the process of fulfilment of the Action Plan; – reflect, in the policy documents at a local level, the actions from the Action Plan relating to them
16	National Institute of Justice	<ul style="list-style-type: none"> – Organizes and performs trainings for the representatives of the justice system on the examination of corruption cases and corruption related cases

17	Nongovernmental organizations and associative sector	<ul style="list-style-type: none"> – Monitor the implementation of the Program and Action Plan, both in virtue of their participation in the activity of the Monitoring Group (as members with full rights or observers) and independently of this process; – prepare studies/alternative monitoring reports on the implementation of the Program and Action Plan
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IX. REPORTING PROCEDURES

63. The goal of the monitoring consists in following the progress in the implementation of the Action Plan with a view to determining the degree of fulfilment of the actions and their conformity with the planned ones, another important aspect is to emphasize the deficiencies in the fulfilment of actions, with the submission of proposals for remedies.

64. The subjects responsible for Program implementation monitoring are:

- 1) managers of the public entities responsible for the fulfilment of the Action Plan;
- 2) Parliamentary Committee for national security, defence and public order;
- 3) Monitoring Group;
- 4) secretariate of the Monitoring Group;
- 5) civil society.

65. In the process of Program implementation, the following monitoring and evaluation procedures with the performed:

1) Semestral monitoring – a continuous process performed every 6 months, which involves the collection, analysis and interpretation of the data relating to the Program activities progress with the aim of ensuring the conformity with the Action Plan and identifying eventual deviations and deficiencies in fulfilment. The secretariate of the Monitoring Group shall prepare the semestral report on the implementation of the Program and Action Plan based on the semestral reports on the fulfilment of the Action Plan presented by the implementing public entities. The semestral reports on the implementation of the Program and Action Plan, which shall be published on the official website of the National Anticorruption Centre, will represent a table summary of the achieved progress and identified deficiencies, with the submission of proposal for their remedy.

The semestral reports on the fulfilment of the Action Plan shall be presented to the secretariate of the Monitoring Group by the implementing public entities till the 20th day of the month following the reporting term.

2) Annual monitoring – evaluation of the actions with annual and fixed term reporting, ended with a progress and evaluation report on the implementation of the Program and Action Plan. The annual progress report is of analytical nature and

represents a reference document for the planning of the next year of implementation, with the inclusion of data on the fulfilment of the actions from the Action Plan, with annual and fixed term reporting, as well as of the deficiencies noticed in the process of performing the due actions. The annual progress report on the implementation of the Program and Action Plan shall be prepared by the secretariat of the Monitoring Group and published on the official website of the national Anticorruption Centre.

The annual reports on the fulfilment of the Action Plan, based on which the annual progress report is prepared, shall be presented to the secretariate of the Monitoring Group by the implementing public entities till the 20th day of the month following the reporting term. The information presented in the reports of the implementing public entities shall be described in an objective and detailed manner, for each due action (including with the corresponding arguments on the deficiencies in the fulfilment of the actions and measures taken to remedy and avoid deficiencies).

The annual progress report shall have the following structure:

- a) summary;
- b) introduction;
- c) findings (detailed presentation of the evaluation results, in accordance with the monitoring indicators);
- d) conclusions;
- e) recommendations.

3) Final evaluation – done at the end of the period of implementation of the public policy document. The final evaluation is done to estimate the degree of Program implementation and to set the needs and domains of approach in the future anticorruption policy document. The final report on Program implementation shall be prepared by the secretariate of the Monitoring Group and presented to the Monitoring Group for approval. The final report shall be published on the official website of the National Anticorruption Centre, according to the reporting procedure established during the annual monitoring.

66. The implementing public entities specified in the Action Plan as responsible authorities/institutions shall ensure the reflection in their own annual activity plans the objectives and actions included in the Action Plan, with the planning of financial resources for their fulfilment. Within the mentioned authorities/institutions, the responsible persons shall be appointed by internal order of the managers, and such responsible persons will ensure the provision of all the necessary information and the presentation of reports on the degree of implementation of the Program and Action Plan. The identification of the responsible persons will allow facilitating the communication of such authorities/institutions with the secretariate of the Monitoring Group. The secretariate of the Monitoring Group shall prepare and update annually the list of persons responsible for the reporting on the Program actions. In case of replacement of the responsible person, the implementing public entities should notify

this to the secretariate of the Monitoring Group, with the indication of the new responsible person and their contact data.

67. The National Anticorruption Centre ensures the activity of the *secretariate of the Monitoring Group* by assigning this task to the Service of Anticorruption Policies, a subdivision of the Centre. The secretariate shall coordinate the process of collection of information and reports on Program implementation by the authorities/institutions responsible for the implementation of the actions, requesting data, information, analysis or other categories of relevant data for the monitoring and evaluation of the degree of Program implementation. As the case may be, the National Anticorruption Centre, as a coordinating institution responsible for the fulfilment and monitoring of the Program, may establish another format for the collection and analysis of the information to be reflected in the monitoring and evaluation reports on the Program.

68. The duties of the secretariate of the Monitoring Group are as follows: 1) keeping records on the members of the Monitoring Group; 2) organizations of the meetings of the Monitoring Group; 3) preparation of the minutes of meetings and orders of the Monitoring Group; 4) requesting, collecting, storing and synthesizing the information presented by the implementing public entities; 5) preparation of the semestral and annual reports on the implementation of planned actions for each action of the Program and other duties issuing from the above listed.

69. The implementing public entities shall present to the secretariate of the Monitoring Group, in electronic form, the information necessary for the monitoring and evaluation of the progress in the implementation of the planned actions, of which they are responsible, according to the deadlines established in the Action Plan. The secretariate shall integrated the information presented on the electronic platform for reporting the progress in Program implementation and connect to such platform all the responsible authorities/institutions. The Government shall facilitate the issuance of electronic signatures or, as the case may be, additional electronic signatures to such authorities/institutions.

70. The Monitoring Group for Program implementation represents the basic structure, the goal of which is to examine and evaluate the information presented during the reporting process by the implementing public entities, and it is also responsible for the approval of the annual report on the monitoring and evaluation of Program implementation, as well as for the approval of the final report. The members of the Monitoring Group shall convene meetings, when necessary, but at least once a year, to examine the annual progress of the authorities/institutions responsible for implementation, as well as registered deficiencies. The Monitoring Group may submit proposals and recommendations for the remedy of deficiencies found in the process of Program implementation.

71. The members of the Monitoring Group shall be representatives of the public sector, justice sector, civil society and private sector. During the first meeting of the Monitoring Group, the president and deputy president of the Group shall be elected. The following are part of the Monitoring Group:

- 1) one member of the parliamentary Committee for national security, defence and public order;
- 2) the counsellor of the President of the Republic of Moldova in the sphere of defence and national security;
- 3) the General Secretary of the Government;
- 4) one deputy director of the Intelligence Service;
- 5) the deputy president of the National Integrity Authority;
- 6) one deputy of the General Prosecutor;
- 7) one member of the Higher Council of Magistracy;
- 8) the deputy president of the Central Electoral Commission;
- 9) one deputy director of the National Anticorruption Centre;
- 10) one state secretary of the Ministry of Justice;
- 11) two deputy presidents of the Association Congress of Local Authorities of Moldova;
- 12) three representatives of the civil society in the sphere of anticorruption;
- 13) one representative of the Chamber of Commerce and Industry;
- 14) two representatives of the associative sector.

In case of impossibility of representation, the management of the mentioned entities may delegate another representative to the composition of the Monitoring Group.

72. The Parliamentary Committee for national security, defence and public order shall coordinate the process of Program implementation and ensure parliamentary control on the activity of the public entities responsible for the fulfilment of the actions entrusted to them. At the same time, the Committee shall delegate a member in the Monitoring Group, who shall ensure the performance of parliamentary control and inform the Committee on the progresses and deficiencies in the Program implementation.

73. The preparation of alternative evaluation reports on Program implementation by the civil society organizations is encouraged. The alternative reports may offer qualitative assessments on the attained objectives and fulfilled measures from the Program and Action Plan, supported also by opinion surveys on the corruption preventing and fighting and on the perception of the corruption phenomenon at a national level. The value of the alternative reports is quite high in the context when the civil society is the watchdog ensuring that the interest of the citizen is correctly reflected and integrated in the public policies developed by the state authorities, contributing to the increase of the degree of their accountability towards the citizen. In this sense,

public discussions may be organized with the representatives of the civil society and other actors interested in the implementation and in the challenges during the implementation of the policy document.

74. The procedures of reporting, monitoring and evaluation of the level of fulfilment of the Action Plan shall not involve the management of information classified as state secret. For the purpose of ensuring the transparency of the implementation processes of this Program, all the annual progress reports, alternative reports and final evaluation report, as well as the orders of the Monitoring Group shall be published on the official website of the National Anticorruption Centre.

ACTION PLAN
on the implementation of the National Program of Integrity and Anticorruption for 2024–2028

Actions	Monitoring indicators	Implementation costs (mii lei)	Source of funding	Deadline	Responsible authorities/institutions
General objective 1. DEVELOPMENT AND IMPLEMENTATION OF INTEGRITY STANDARDS IN PUBLIC SECTOR					
<i>Specific objective 1.1. Strengthening the integrity climate within the public entities by efficiently and conscientiously fulfilling the integrity standards, till 2028</i>					
1.1.1. Ensuring the employment and promotion of civil servants based on merits and professional integrity	Number of civil servants employed as a result of tenders; number of integrity records requested by the public entities at employment; number of contestations submitted against the organized tenders; number of civil servants employed/reconfirmed in office as a result of the verification according to Law no. 271/2008 on the verification of the holders of and candidates to public office; number of integrity certificates requested by the public entities	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities (central level and local II level); National Anticorruption Centre; Intelligence Service; National Integrity Authority

1.1.2. Ensuring the training process using the e-Learning platform and updating the “Integrity and anticorruption” course on the e-Learning platform	Amended and operational course; number of trained public entities; number of trained civil servants	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 (for the first indicator); 2028 quarter IV (with annual reporting of progress indicators)	Electronic Governance Agency; National Anticorruption Centre; Institute of Public Administration
1.1.3. Training the civil servants and managers of public entities on the institutional integrity requirements	Number of trained managers and civil servants (disaggregated by gender); number of training requests on institutional integrity	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Institute of Public Administration; National Institute of Justice
1.1.4. Ensuring the observance of the regime of incompatibilities, restrictions in hierarchy and limitation of publicity	Number of cases of incompatibilities and restrictions in hierarchy identified and solved in public entities; Number of complaints to the National Integrity Authority on the infringement of the regime of incompatibilities, restrictions in hierarchy and limitation of publicity	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities the public agents of which are subject to the declaration of assets and personal interests; National Integrity Authority
1.1.5. Ensuring that the regime of declaration of assets and personal interests is observed	Number of civil servants employed/appointed/ with mandates validated during the year and number of declarations submitted at the moment of	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities the public agents of which are subject to the declaration of assets and personal interests ;

	<p>employment/appointment/ mandate validation; number of civil servants employed/appointed/ with mandates validated during the year working in the public entity during the year and number of declarations submitted annually; number of civil servants, the mandates/labour relations of which terminated during the year and number of declarations submitted at the moment of termination of the mandate/labour relation during such year; number of establishing reports of the National Integrity Authority on the existence of unjustified wealth; number of criminal and contravention cases examined on the infringement of the regime of declaration of assets and personal interests</p>				<p>National Integrity Authority; National Anticorruption Centre</p>
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1.1.6. Extending the verification of expenses and virtual assets, as well as of the assets of beneficiary owners	Policies and procedures developed and approved; functional interoperability between databases; number of performed extended verifications	80.3	Budgetary sources; other sources	2024 quarter IV	National Integrity Authority; Electronic Governance Agency
1.1.7. Implementation of the automated verification of the declaration of assets and personal interests in the part relating to the timely submission, observance of the form requirements and presence of an apparent infringement of the legal regime of declaration of assets and personal interests, so as the electronic system validates the form	Developed and approved guidelines/methods for each procedure; developed and operational software; number of declarations submitted in electronic form and verified automatically	2,648.3	Budgetary sources; other sources	2024 quarter IV	National Integrity Authority
1.1.8. Implementation of the risk-based verification of the declarations of assets and personal interests	Developed and approved normative framework for the risk-based verification of the declaration of assets and personal interests; developed and approved regulations on the performance of the risk analysis; developed and operational software for risk-based verification; declarations of assets and personal interests verified	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter IV	National Integrity Authority

	using the automated process of risk-based verification				
1.1.9. Ensuring the observance of the regime of conflicts of interests and inadmissibility of favouritism	Number of conflicts of interests declared and solved within the public institutions; number of conflicts of interests notified to the National Integrity Authority; number of the reports on findings issued by the National Integrity Authority on conflicts of interests; number of legal acts approved in situations of conflicts of interests and cancelled in court at the request of the National Integrity Authority; number of contravention files examined on conflicts of interests	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities, the public agents of which are subject to the declaration of assets and personal interests; National Integrity Authority
1.1.10. Ensuring the observance of the regime of gifts	Number of gifts surrendered to the commissions for recording and evaluating gifts in public institutions; number and amount of gifts redeemed in public institutions;	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities (central level and local II level); National Anticorruption Centre

	number of inadmissible gifts transmitted to anticorruption agencies and number of criminal and contravention files examined; gift recording registers, updated and published on the website of public institutions				
1.1.11. Amendment of the legal framework regulated the legal regime of gifts in the parts relating to inadmissible gifts according to the Law on integrity no. 82/2017	Approved normative act	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter I	Ministry of Justice; National Anticorruption Centre; Parliament
1.1.12. Ensuring the inadmissibility of undue influence by means of reporting and solving	Number of cases of undue influence reported, solved within the public institutions; number of cases of undue influence reported to the National Anticorruption Centre and Intelligence Service; developed/updated registers of cases of undue influence towards civil servants	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities (central level and local II level); National Anticorruption Centre; Parliament; Intelligence Service
1.1.13. Ensuring the inadmissibility and reporting of corruption	Number of corruption manifestations reported by civil servants to the managers of public entities	Within the limits of the approved budgets of	Budgetary sources; other sources	2028 quarter IV (with annual reporting of	Public entities (central level and local II level); National Anticorruption Centre

manifestations and protection of whistleblowers	and anticorruption agencies; number of whistleblowing notices submitted within the public entities; number of whistleblowing notices sent to the National Anticorruption Centre; number of persons having requested/having received protection; number of employers brought to liability according to art. 314 ¹ of the Contravention Code no. 218/2008 for not ensuring the measures for the protection of the employees recognized as whistleblowers	responsible authorities		progress indicators)	
1.1.14. Training the civil servants on whistleblowing and protection of whistleblowers, as well as the civil servants responsible to manage whistleblowing in public entities	Developed and approved training programs; number of organized thematic trainings; number of trained civil servants	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Office of the Ombudsman; Public entities (central level and local II level)
1.1.15. Development and implementation of policies/procedures for interinstitutional cooperation in examining	Created interinstitutional working group for cooperation; developed and approved internal procedure for	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter IV	National Anticorruption Centre; Office of the Ombudsman

the cases of whistleblowers and their protection	interinstitutional cooperation				
1.1.16. Ensuring the implementation of corruption risk management	Risk registers, including corruption risk registers, developed/updated by public entities; register of fraud and corruption risks updated according to the integrity incidents within the public entities	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities (central level and local II level)
1.1.17. Ensuring the implementation and observance of the ethics and deontology norms	Approved/updated codes of ethics and deontology, for the public entities, which do not have such codes; approved annual training plans, including continuous training; number of trainings and civil servants trained in the norms of ethics and deontology; number of cases of infringement of ethics and deontology norms ending with a disciplinary penalty	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities (central level and local II level)
1.1.18. Approval of the national normative framework on the ethics and conduct of a MP in the Parliament	Approved normative act	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter IV	Parliament
Specific objective 1.2. Ensuring an open governance and the observance of transparency in decision making, till 2028					

1.2.1. Hearing, in the plenum of the Parliament, the annual reports of the independent authorities under parliamentary control (at least: National Anticorruption Centre, National Integrity Authority, General Prosecutor Office, Court of Accounts, Ombudsman)	Number of organized hearings; annual reports of the authorities published on their websites and on the Parliament; issues identified in the reports discussed during the hearings	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter I (with annual reporting of progress indicators)	Parliament
1.2.2. Development and publication on the websites of the public institutions of clear instructions, meant for the public, on the procedures of bringing civil servants to disciplinary liability (especially – the way of notification of the disciplinary commissions)	Number of public entities having developed the instructions	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	Public entities (central level and local II level)
1.2.3. Development/maintenance of a digital platform for the improvement of the online monitoring of the legislative process, from the moment the draft law is registered in the Parliament till the law is approved	Operational digital platform on the website of the Parliament; number of visits of the website of the Parliament after launching the digital platform	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter I	Parliament
1.2.4. Ensuring the process of corruption proofing of draft normative acts subject to anticorruption proofing	Number of draft normative acts (subject to anticorruption proofing according to Law no.	Within the limits of the approved budgets of	Budgetary sources; other sources	2028 quarter IV (with semestrial	National Anticorruption Centre; Parliament; State Chancellery;

only after the drafts become definitive after endorsement	82/2017) developed by the central public authorities having the right of legislative initiative/MPs in the Parliament and preliminarily subjected to anticorruption proofing	responsible authorities		reporting of progress indicators)	Public entities
1.2.5. Publication of the objection synthesis from the corruption proofing reports on the websites of the Government/Parliament	Objection synthesis from the corruption proofing reports published on the websites of the Government/Parliament	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	National Anticorruption Centre; Parliament; State Chancellery; Public entities
1.2.6. Development of a study on the need to institute the office of integrity counsellor and, as the case may be, amendment of the normative framework	Developed and published study; as the case may be, approved draft normative act; as the case may be, instituted office of integrity counsellor	69,6	Budgetary sources; other sources	2027 quarter IV	National Anticorruption Centre; Ministry of Justice; State Chancellery
1.2.7. Development of a study on the need to regulate the lobby activity in the Republic of Moldova and, as the case may be, amendment of the normative framework	Developed and published study; as the case may be, approved draft normative act	69,6	Budgetary sources; other sources	2027 quarter IV	National Anticorruption Centre; Ministry of Justice; State Chancellery
<i>Specific objective 1.3. Transparent and responsible management of public equity, till 2028</i>					
1.3.1. Ensuring the transparent and responsible	Published information on the management of the property of public entities;	Within the limits of the approved budgets of	Budgetary sources;	2028 quarter IV	Public entities (central level and local II level); Ministry of Finance;

management of the public property	internal audit cards, strategic plans and annual plans of audit activity, as well as annual reports on the internal audit activity approved by the public entities; declarations of management responsibility published on the websites of public entities; (consolidated) annual report on internal public financial control presented to the Government	responsible authorities	other sources	(with annual reporting of progress indicators)	Public Procurement Agency; Public Property Agency
1.3.2. Ensuring the transparent and responsible management of foreign assistance	Published information on the drawing and management of foreign assistance; reports of the public entities that have drawn foreign funds on the result (performance) obtained after such assistance	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Ministry of Finance; Public entities (central level and local II level)
1.3.3. Development of the public procurement system by increasing the efficiency and using the electronic system for the entire procurement cycle (planning, conduction of the procedure, award, contract management)	Electronic public procurement system, operational according to the concept; % of procedures conducted and fully available in the system (from planning till contract management, inclusive, of the total procedures	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2026 quarter II	Public Procurement Agency

1.3.4. Increasing the efficiency of the public procurement process by decreasing the transaction costs and instituting the mechanism of joint public procurements	Developed mechanism on the association of contracting entities with a view to conducting joint procurement procedures; drafted best practice guide on the association of contracting entities with a view to conducting joint procurement procedures	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter III	Ministry of Finance; Public Procurement Agency
1.3.5. Training the staff involved in the process of public procurement (especially on planning/preparation, including market consultation, organization of procedures and award of public procurement contracts)	Number of performed trainings; number of trained employees	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities; Ministry of Finance; Public Procurement Agency
1.3.6. Ensuring the operability of the internal audit units in public entities	Number of operational audit units; number of internal auditors	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public entities
<i>Specific objective 1.4. Strengthening the integrity and decreasing corruption in the electoral process, till 2028</i>					

1.4.1. Implementation of fast cooperation/reporting/ intersectoral exchange of information between the Central Electoral Commission, Anti corruption Prosecutor Office, National Anticorruption Centre, Ministry of Internal Affairs (General Police Inspectorate), Intelligence Service regarding political party financing and fighting electoral fraud, especially during the electoral period	Developed and approved concept for fast cooperation; fast information/ communication mechanisms developed by the participants; created intersectoral groups for fast communication in the electoral period	64,2	Budgetary sources; other sources	2024 quarter IV (subsequently, during electoral periods)	Central Electoral Commission; Anticorruption Prosecutor Office; National Anticorruption Centre; Ministry of Internal Affairs; Intelligence Service
1.4.2. Regulation of political party financing by third parties, including the regulation of their involvement in online electoral advertising	Approved normative act	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter I	Central Electoral Commission; Ministry of Justice
1.4.3. Regulation of online political advertising and electoral campaigns online (admissible limits and setting the sanctions)	Approved normative act	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter II	Central Electoral Commission; Ministry of Justice; National Anticorruption Centre

1.4.4. Amendment of the legal framework on improving the mechanisms for monitoring the real expenses of political parties and electoral candidates	Approved normative act	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter II	Central Electoral Commission; Ministry of Justice; National Anticorruption Centre
1.4.5. Encouraging the development of online platform for financing/donation by political parties with a view to making the process of funding/donation for electoral purposes a transparent one	Number of created online platforms	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2027 quarter II	Central Electoral Commission; political parties
1.4.6. Presentation by the Parliament of the report on financing the political parties, electoral campaigns and/or initiative groups	Annual report placed on the website of the Central Electoral Commission	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	Annually on 1 June	Central Electoral Commission; Parliament
General objective 2. INCREASING THE EFFICIENCY OF THE MEASURES FOR CORRUPTION PREVENTION AND FIGHTING AND ENSURING THE UNAVOIDABILITY OF PENALTIES FOR CORRUPTION OFFENCES					
<i>Specific objective 2.1. Increasing the efficiency of implementation of corruption prevention measures, till 2028</i>					
2.1.1. Increasing the responsibility of the managers of public entities for the development, maintaining and strengthening the integrity climate by means of a gradual increase of the	Increasing number of public entities subjected to institutional integrity evaluation; identified and eliminated corruption factors and risks;	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre

number of public entities evaluated annually	approved and enforced integrity plans; average share of actions performed from the approved and enforced integrity plans				
2.1.2. Normative regulation and development of the „reLAWed” platform by ensuring a cooperation of public entities in the process of examining the signals received through the platform	Drafted and approved normative act on the technical concept; drafted and approved normative act on establishing the procedure and way of use of the platform; developed and operational informational system; developed and approved guide for public entities on examining the reported signals; number of signals reported through the platform; number of requests submitted to the public entities responsible for the examination of signals sent through the platform	4,398.8	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Ministry of Justice; Public entities
2.1.3. Development of the „e-Institutional integrity” automated informational reporting system	Operational „e-Institutional integrity” informational system, plugged into the new program	1,338.0	Budgetary sources; other sources	2025 quarter II	National Anticorruption Centre
2.1.4. Improvement of the institutional capacities of	Approved draft normative act;	36,561.0	Budgetary sources;	2024 quarter IV	National Anticorruption Centre;

the National Anticorruption Centre and National Integrity Authority in the sphere of corruption prevention	National Anticorruption Centre and National Integrity Authority provided with financial resources and equipment necessary for good activity; increasing number of employees of the National Integrity Authority with control duties and analysis competences; increasing number of employees of the National Anticorruption Centre with duties to evaluate the institutional integrity; increasing number of employees of the National Anticorruption Centre with duties to perform corruption proofing of draft normative acts		other sources		National Integrity Authority; Parliament
2.1.5. Ensuring the collaboration between the National Anticorruption Centre and administrative-territorial units with a view to strengthening the institutional integrity	Number of organized events; number of trained persons	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Congress of Local Authorities of Moldova; Administrative-territorial units (including amalgamated units)
<i>Specific objective 2.2. Improving the institutional framework with a view to increasing the efficiency of investigation and criminal prosecution of corruption cases, till 2028</i>					

2.2.1. Strengthening the institutional, technical and operational capacity of the National Anticorruption Centre and Anticorruption Prosecutor Office regarding the investigation and fighting corruption acts and those related to corruption acts, as well as corruptible deeds	Approved normative act on the increase of the number of staff for the corruption fighting component; provided equipment and informational systems necessary for the good operation of the activities of investigating corruption offences	37,561.0	Budgetary sources; other sources	2024 quarter IV	National Anticorruption Centre; General Prosecutor Office/Anticorruption Prosecutor Office; Parliament
2.2.2. Training and developing the competences of the investigation and criminal prosecution officers, prosecutor by means of professional training on the criminal prosecution of corruption cases	Developed, approved training program; number of organized trainings; number of trained persons	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	National Institute of Justice; National Anticorruption Centre; General Prosecutor Office/Anticorruption Prosecutor Office
2.2.3. Establishing and maintaining an efficient and transparent framework of public communication in relation to the investigation and criminal prosecution of corruption cases	Developed, approved and published policy document; approved and published action plan	50,2	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	National Anticorruption Centre; General Prosecutor Office/ Anticorruption Prosecutor Office
2.2.4. Increasing, based on the international practice in this area, of the efficiency of execution of confiscation decisions	Created working group; proposals formulated and agreed within the working group; developed and approved draft for the amendment of the normative framework	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter II	Ministry of Justice; Parliament; National Anticorruption Centre (Criminal Asset Recovery Agency); State Tax Service; Ministry of Finance;

					General Prosecutor Office/ Anticorruption Prosecutor Office
2.2.5. Improvement of the legal framework for the strengthening of capacities of the authorities responsible for the prosecution and freezing of criminal assets	Approved draft for the amendment of the normative framework	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter II	Ministry of Justice; National Anticorruption Centre (Criminal Asset Recovery Agency); General Prosecutor Office/ Anticorruption Prosecutor Office; Parliament; Ministry of Internal Affairs; State Tax Service; Customs Service
<i>Specific objective 2.3. Increasing the efficiency of the process of examination in trial and penalization of corruption cases, till 2026</i>					
2.3.1. Institution of courts/court panels specialized in examining the files for corruption acts and related acts	Operational specialized courts/court panels; mechanism and procedure of selection of judges, as well as increased criteria for integrity and salaries for such judges developed and approved by the Government and Parliament	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter IV	Ministry of Justice; Higher Council of Magistrates; Parliament
2.3.2. Provision of the courts/court panels specialized in examining the files for corruption acts and related acts with enough human, technical and financial resources in	Approved budget and available technical means for the activity of the courts/court panels	22,890.5	Budgetary sources; other sources	2025 quarter II	Higher Council of Magistrates; Ministry of Finance; Parliament

accordance with the legal provisions					
2.3.3. Development by the judges of a guide for the examination of corruption cases	Developed and approved guide	50.2	Budgetary sources; other sources	2025 quarter IV	Supreme Court of Justice
2.3.4. Establishing and regulating the mechanism of monitoring of the legal persons accused of committing corruption offences that have concluded a judicial agreement of public interest	Created interinstitutional working group (National Anticorruption Centre/ Ministry of Justice/ General Prosecutor Office); drafted and approved normative act in establishing the monitoring procedure; operational mechanism of monitoring of the legal persons accused of committing corruption offences that have concluded a judicial agreement of public interest	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter II	National Anticorruption Centre; Ministry of Justice; General Prosecutor Office; Higher Council of Magistrates
2.3.5. Development of the mechanism of social reusing of confiscated assets	Collected, validated and transmitted information; value of confiscated assets reused for social interest; developed analysis on the opportunity of allocating a percentage of the total annual confiscated amount for certain crime	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter II	Ministry of Finance (State Tax Service); Ministry of Justice; Ministry of Labour and Social Protection; National Union of Bailiffs; General Prosecutor Office;

	prevention projects, as well as of using the confiscated real estate objects, for community benefit, by social enterprises or civil society organizations				Public Property Agency; National Anticorruption Centre (Criminal Asset Recovery Agency)
2.3.6. Strengthening the capacities of judges and prosecutors in the examination of corruption cases and related cases	Developed training programs; number of organized thematic trainings; number of trained judges	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Institute of Justice; Higher Council of Magistrates; Higher Council of Prosecutors
2.3.7. Development the capacities of the attorneys on the assistance offered to the victims and damaged parties within the criminal proceedings on corruption offences and related offences	Developed training programs; number of organized thematic trainings; number of trained attorneys	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Institute of Justice; National Council for State Guaranteed Legal Assistance
2.3.8. Development of a strategic analysis on the judicial practice of applying the mechanism of special confiscation and extended confiscation, as security measures	Developed and published strategic analysis	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter I	National Anticorruption Centre; General Prosecutor Office

2.3.9. Amendment of the provisions of the Criminal Code in accordance with the Constitutional Court recommendations stated in decisions no. 22/2017, no. 33/2017, no. 22/2018, no. 24/2019 and no. 39/2021	Amended and approved normative framework	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter II	Ministry of Justice; Parliament; General Prosecutor Office; National Anticorruption Centre; Anticorruption Prosecutor Office
<i>Specific objective 2.4. Strengthening the integrity of institutions in the justice sector involved in the investigation, criminal prosecution and court trials of corruption cases, till 2028</i>					
2.4.1. Performance of the management of institutional corruption risks in courts and implementation of measures to mitigate corruption risks related to professional activity	Number of identified risks; number of intervention measures; published register of corruption risk management	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV	Courts of all levels; Higher Council of Magistrates
2.4.2. Training the judges and prosecutors on the procedure of examination of cases involving whistleblowers	Developed and approved training program; number of performed trainings; number of trained persons	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Institute of Justice; Higher Council of Magistrates; General Prosecutor Office; Anticorruption Prosecutor Office
2.4.3. Taking actions with a view to strengthening the seizure mechanism	Share of submitted requests; increase by 80% of the share of seizures applied and confirmed by subsequent evolutions	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2024 quarter III	General Prosecutor Office; Anticorruption Prosecutor Office; National Anticorruption Centre; Ministry of Justice;

					Ministry of Internal Affairs; State Tax Service; Customs Service
2.4.4. Developed f a study on judicial practice on corruption cases and related cases	Developed and published study	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2026 quarter III	National Anticorruption Centre; General Prosecutor Office; Supreme Court of Justice
Specific objective 2.5. Ensuring and continuous development of international cooperation in the sphere of integrity, corruption prevention and fighting, till 2028					
2.5.1. Strengthening the cooperation relations with the foreign, regional and international authorities /institutions with a view to cultivating integrity, corruption preventing and fighting, criminal assets recovery	Number of concluded collaboration agreements; number of organized /attended activities /events	183.6	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Ministry of Foreign Affairs
2.5.2. Increasing the efficiency of the exchange of information with the foreign, regional and international organizations /institutions in the sphere of investigation of corruption acts, corruption related acts, corruptible deeds, including criminal assets recovery	Created joint investigation teams; number of received/sent requests, of received answers; number of performed meetings/visits; access/connection to secured information exchange channels; received/sent requests through such channels;	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	General Prosecutor Office/ Anticorruption Prosecutor Office; National Anticorruption Centre; Ministry of Foreign Affairs

	number of criminal assets identified and seized abroad				
2.5.3. Implementation of the provisions of international treaties in the sphere of corruption preventing and fighting	Received/sent requests/questionnaires; Examined / developed /approved evaluation/monitoring reports; number of attended activities/events	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Public entities
2.5.4. Cooperation and exchange of information on the cases of fraudulent obtaining, contrary to the destination, embezzlement of means from foreign funds offered by the Euiropean Union, on cases of corruption and other related acts that may prejudice the financial interests of the European Union	Number of requests received from / sent to the European Anti-Fraud Office (OLAF), European Public Prosecutor's Office (EPPO), European Investments Bank; number of controls and inspections performed on site; number of meetings attended by representatives of the authorities/public institutions	154,0	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; General Prosecutor Office/ Anticorruption Prosecutor Office; State Chancellery; Public entities
General objective 3. CULTIVATION OF INTEGRITY AND DIMINISHING CORRUPTION ACTS IN THE PRIVATE SECTOR, INCLUDING IN THE FULLY OR MAJORITY STATE-OWNED ENTITIES					
<i>Specific objective 3.1. Strengthening the transparency and integrity standards in the fully or majority state-owned entities, till 2028</i>					

3.1.1. Ensuring, through managing bodies, the implementation of the code of conduct for state and municipal enterprises and training of staff	Number of state and municipal enterprises having approved and published codes of conduct; number of employees trained in the application of the code	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2027 quarter I	Public Property Agency; fully or majority state-owned entities
3.1.2. Development of the policy for the remuneration of management and control bodies of public enterprises, including payment of the compensation from the recorded net profit of the enterprise, excluding any political or enterprise management influence in the redistribution of the net profit	Developed and approved remuneration policy; number of public enterprises applying the remuneration policy	50.2	Budgetary sources; other sources	2025 quarter II	Ministry of Economic Development and Digitization; Public Property Agency; fully or majority state-owned entities
3.1.3. Development of a methodology for the evaluation of the conformity with the legislation and anticorruption and good corporate governance standards, including with OECD guidelines, in state/municipal enterprises	Performed analysis and formulated findings/recommendations; developed, approved and published methodology	83.6	Budgetary sources; other sources	2025 quarter IV	Ministry of Economic Development and Digitization; Public Property Agency
3.1.4. Development/update of the risk register, which shall also include the fraud and corruption risks, and monitoring the	Risk register, including also fraud and corruption risks, developed, approved and placed on the website of the enterprise;	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of	Public Property Agency; fully or majority state-owned entities

implementation of actions to mitigate the identified risks	number of enterprises having approved and published the Risk register, including also fraud and corruption risks			progress indicators)	
3.1.5. Ensuring the implementation of transparency requirements according to the provisions of the legislation, as well as of the Corporate Governance Code for public enterprises	Published annual report of the public enterprise (including annual financial statements); Published information on the composition of the management and control bodies; Published auditor's report; published procurement plan, published procedures for the procurement of goods, works and services (for state and municipal enterprises); published information on the fulfilment of procurement contracts (for state and municipal enterprises); published large transactions and transactions with conflict of interests	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	Public Property Agency; fully or majority state-owned entities
3.1.6. Amending the legal framework on the application of legal requirements stated in Law	Approved amending normative acts	Within the limits of the approved budgets of	Budgetary sources; other sources	2025 quarter IV	Ministry of Finance; Public Procurement Agency; Parliament

no. 131/2015 on public procurements regarding the fully or majority state-owned enterprises		responsible authorities			
<i>Specific objective 3.2. Promoting and ensuring the integrity in the private sector, till 2028</i>					
3.2.1. Institution of a unitary normative framework for the regulation of the regime of restrictions and limitation in connection with the termination of mandate, labour relations and migration of civil servants into the private sector (pantouflage), of some control and penalization procedures related to the infringement of interdictions	Created working group; developed and approved normative framework	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter IV	State Chancellery; Ministry of Justice; Ministry of Economic Development and Digitization; National Integrity Authority
3.2.2. Strengthening and promoting integrity standards by establishing a system of integrity awards in the private sector	Organized „Trademark of the year” contest; revised and updated selection criteria; number of participants in the nomination	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Chamber of Commerce and Industry; Private sector
3.2.3. Encouraging the undertaking by companies of the SM ISO 37001 international standard for anticorruption management systems	Number of organized events; number of participants/companies; number of companies having undertaken the SM ISO 37001 international	108,0	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre; Private sector, including fully or majority state-owned entities;

	standard for anticorruption management systems				Chamber of Commerce and Industry; Public Property Agency
3.2.4. Performance of a study on the opportunity of creating the Business Ombudsman institution in the Republic of Moldova and, as the case may be, amendment of the normative framework	Performed and published study; number of submitted and implemented recommendations; as the case may be, amended normative framework	83.6	Budgetary sources; other sources	2026 quarter IV	Ministry of Economic Development and Digitization; Ombudsman
<i>Specific objective 3.3. Increasing the efficiency of the transparency mechanism in offering state aid, till 2028</i>					
3.3.1. Evaluation of corruption risks in the procedures of examination and allocation of subsidies and state aid to the private sector	Number of identified risks; approved risk remedy plan	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2025 quarter III	Competition Council; Ministry of Agriculture and Food Industry; Agency for Intervention and Payments for Agriculture; National Anticorruption Centre
3.3.2. Automation and anonymization of the process of initial evaluation of files on allocating subsidies and state aid	Evaluated existing mechanism; evaluated need to modify the process of initial evaluation; Automated and anonymized process of initial evaluation; share of files evaluated initially through an automated and anonymized process	69.6	Budgetary sources; other sources	2028 quarter II	Ministry of Economic Development and Digitization; Ministry of Agriculture and Food Industry; Competition Council; Agency for Intervention and Payments for Agriculture

3.3.3. Revision of the national legal framework and its alignment to the European Union legislation on granting state aid	Number of normative acts aligned to the European Union legislation	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter III	Ministry of Economic Development and Digitization; Competition Council
General objective 4. CULTIVATION OF INTOLERANCE TOWARDS CORRUPTION ACTS AND ENCOURAGING THE REPORTING OF CORRUPTION ACTS AND ILLEGAL PRACTICES					
<i>Specific objective 4.1. Strengthening the intolerance towards corruption acts and related acts among the population, till 2028</i>					
4.1.1. Increasing the degree of anticorruption education, awareness raising and promoting the integrity among citizens	Methods and tools used in information; number of performed events and number of participants in them	735.2	Budgetary sources; other sources	2028 quarter IV	National Anticorruption Centre
4.1.2. Involvement of the anticorruption volunteers of the National Anticorruption Centre in the activities of integrity promotion and strengthening the intolerance towards corruption	Number of performed activities; number of trained persons; number of volunteers involved	210.0	Budgetary sources; other sources	2028 quarter IV (with annual reporting of progress indicators)	National Anticorruption Centre
4.1.3. Performance of surveys and research activities on the corruption phenomenon and corruption related acts	Number of performed evaluations, surveys; synthesized and published results of the surveys	2,297.5	Budgetary sources; other sources	2028 quarter IV	Profiling non-governmental organizations
4.1.4. Organization of information and awareness raising campaigns on	Number of organized events; number of trained persons	Within the limits of the approved budgets of	Budgetary sources;	2028 quarter IV (with annual	National Anticorruption Centre

strengthening institutional integrity at a national level		responsible authorities	other sources	reporting of progress indicators)	
<i>Specific objective 4.2. Increasing civic engagement by means of reporting by the citizens of corruption acts, corruption related acts and illegal practices, till 2028</i>					
4.2.1. Ensuring the operation of the electronic Call Centre platform for the national anticorruption hotline for the purpose of optimizing the receipt and recording of calls	Operational electronic platform; number of calls received at the national anticorruption hotline	568.8	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	National Anticorruption Centre
4.2.2. Ensuring the operation and promotion of specialized anticorruption hotlines within the public institutions	Number of operational anticorruption hotlines; number of calls received at the specialized anticorruption hotlines	Within the limits of the approved budgets of responsible authorities	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	Public entities; National Anticorruption Centre
4.2.3. Development of information / awareness raising / collaboration projects dedicated to the citizens with a view to determining them to report corruption acts and corruption related acts (emphasizing the legal reporting paths and procedures)	Number of organized events; number of participants in the organized events	72.0	Budgetary sources; other sources	2028 quarter IV (with semestrial reporting of progress indicators)	National Anticorruption Centre

