



REPORT

**ON MONITORING RESULTS OF THE ACTIONS OF THE REPUBLIC OF
ARMENIA ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION
ACTION PLAN FOR 2019-2022
TO BE PERFORMED IN 2022**

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CONTENT

Abbreviations	5
INTRODUCTION	6
METHODOLOGY	7
MONITORING RESULTS OF THE ACTIONS OF THE REPUBLIC OF ARMENIA ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION ACTION PLAN FOR 2019-2022	12
SECTOR 1: DEVELOPMENT OF THE ANTI-CORRUPTION INSTITUTIONAL SYSTEM	13
ACTION 1. Forming of the Corruption Prevention Commission and ensuring the regular operation thereof.....	13
ACTION 2. Formation of an anti-corruption law enforcement body vested with the functions of revealing and investigating corruption-related crimes and granted with sufficient guarantees of independence - the Anti-Corruption Committee and ensuring normal functioning.....	15
ACTION 3. Establishment of specialized anti-corruption court and ensuring of specialized investigation in anti-corruption cases.....	16
ACTION 4. Establishment of a Department carrying out oversight over the investigation of corruption crimes has been established in the Prosecutor General’s Office of the Republic of Armenia	17
ACTION 5. Building capacities of the bodies, non-governmental organizations responsible for drafting of Anti-Corruption Policy	18
ACTION 6. Ensuring the regular operation of the donor co-ordination mechanism	19
ACTION 7. Appointment of persons in charge of anti-corruption programs (individuals or units) in the Staff of the National Assembly, the Staff of the Prime Minister, independent and autonomous bodies, investigative bodies, the Judicial Department, bodies of the state administration system and local governments, and fixing their functions in relevant documents.....	20
SECTOR 2. PREVENTION OF CORRUPTION.....	23
ACTION 8. Developing sectoral Action Plans based on the corruption risks assessment.....	23
SECTOR 2.1. PREVENTION OF CORRUPTION (Integrity).....	24
ACTION 9. Formation of mechanisms for carrying out oversight over observance of the rules of integrity of persons subject to appointment to state positions, including candidates of the Constitutional Court, candidates for prosecutors and judges, candidates for investigators, prosecutors and judges included in promotion lists, as well as members of autonomous and independent bodies	24
ACTION 10. Assessment of the effectiveness of the enforcement of the Law “On Public Service” and Law “On Civil Service”	26
ACTION 11. Formation and launch of the Institute of Ethics Commissions and Integrity Officers in compliance with the Law "On Public Service"	27
ACTION 12. Prescribing model rules of conduct provided for by the Law “On Public Service” for public servants, rules of conduct of civil servants, rules of conduct of persons holding public office (except MPs, judges, members of the Supreme Judicial Council, prosecutors, investigators), heads of communities, their deputies, heads of administrative districts of Yerevan community, their deputies...28	28

ACTION 13. Prescribing rules of conduct of the deputy and investigator, review of the rules of conduct for prosecutors and judges	30
ACTION 14. Ensuring a merit-based system in the sector of civil service	31
SECTOR 2. PREVENTION OF CORRUPTION.....	32
2.2. PREVENTION OF CORRUPTION (declaration, gifts, impact assessment of regulation, procurement, private sector, beneficial owners, protection of economic competition).....	32
ACTION 15. Increasing the effectiveness of the system of impact assessment of anti-corruption regulation	32
ACTION 16. Improving the system of declaration of property, incomes and interests. Introduction of a system of declaration of expenses	33
ACTION 17. Clarification of incompatibility requirements and conflict of interest situations of persons holding public positions and of public servants	34
ACTION 18. Improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants; and establishment of monitoring tools for it	36
ACTION 19. Ensuring the transparency of funding of political parties, considering the expediency for providing for legislative regulation of lobbying in the Republic of Armenia	37
ACTION 20. Promoting the adoption of anti-corruption compliance requirements in the business sector	39
ACTION 21. Improvement of the field of procurement	40
ACTION 22. Introduction of the institute of beneficial owners of legal entities.....	41
☒ACTION 23. Improvement of legislation on the field of protection of economic competition.....	41
ACTION 24. Increasing the effectiveness of ensuring public participation in the process of elaborating draft legal acts	42
ACTION 25. Introduction of a toolkit for receiving accessible information on the services being provided by state and local self-government bodies to citizens the most.....	43
ACTION 26. Continuous improvement of the system of whistleblowing and improvement of the legislative mechanisms for the protection of whistleblowers.....	43
SECTOR 3. INVESTIGATION OF CORRUPTION-RELATED CASES.....	46
ACTION 27. Clarification of the scope of corruption-related crimes under the Criminal Code of the Republic of Armenia	46
ACTION 28. Studying the compliance of the elements of corruption-related crimes enshrined by the Criminal Code of the Republic of Armenia with international standards, establishing regulations on bringing the corruption-related crimes in line with international standards under the new Criminal Code.....	46
ACTION 29. Developing a methodology for investigation of individual corruption crimes, including illicit enrichment, training of criminal prosecution bodies on the basis of the developed methodology.	48
ACTION 30. Complementing the statistics on corruption-related crimes.....	49
ACTION 31. Ensuring the access of criminal prosecution bodies to the electronic databases of state bodies through electronic enquiry.....	50
ACTION 32. Establishing a centralized register of bank accounts	51

ACTION 33. Strengthening international cooperation in investigating and disclosing corruption-related crimes.....	52
ACTION 34. Establishing mechanisms aimed at confiscation of property of illicit origin.....	53
ACTION 35. Introduction of an institute to subject legal persons to criminal liability for corruption-related offences under the Draft of the New Criminal Code.....	53
ACTION 36. Creating pre-conditions for bringing the legal regulations prescribed by Article 30 of the Law "On Operational Intelligence Activity" in compliance with the law enforcement practice	55
SECTOR 4. PUBLIC AWARENESS AND ANTI-CORRUPTION EDUCATION.....	57
ACTION 37. Elaboration, approval and implementation of a programme of an annual public awareness campaign	57
ACTION 38. Including the non-mandatory course of the subject “Fundamentals of the Anti-Corruption Policy” in the teaching modules of all higher education and secondary vocational education institutions	58
ACTION 39. Providing anti-corruption education in high school	59
ACTION 40. Public awareness-raising on the reforms being implemented in the civil service system, conducting trainings, including on prevention of corruption and integrity.....	60
ACTION 41. Developing distance learning modules for civil servants.....	61
ACTION 42. On-line broadcasting of the testing process of the competitions for filling vacant positions	62
SECTOR 5. MONITORING, OVERSIGHT AND PUBLIC COMMUNICATION	64
ACTION 43. Conducting regular surveys, among the general public, on corruption, public confidence and the impact of anti-corruption measures, publishing the results of survey	64
CONCLUSIONS AND RECOMMENDATIONS.....	66
1. METHODOLOGICAL OBSERVATIONS AND RECOMMENDATIONS	66
2. RECOMMENDATIONS BY SECTORS	66
3. CONCLUSIONS BY SECTORS.....	74
4. FINAL CONCLUSIONS	74
ANNEX 1. PROPOSED STRUCTURE OF ANTI-CORRUPTION STRATEGY FOR 2023-2026.....	75

Abbreviations

ACC	Anti-Corruption Committee
ALA	Armenian Lawyers' Association
CC	Constitutional Court
CE	Council of Europe
CEC	Central Electoral Commission
CPC	Corruption Prevention Commission
CS	Civil Service
CSO	Civil Society Organization
CSB	Civil Service Bureau
EU	European Union
EIIPSVE	Educational Institution Implementing Primary (Craftsmanship) and Secondary Vocational Education
EIISVE	Educational Institution Implementing Secondary Vocational Education
FGD	Focus group discussion
HEI	Higher education institution
HRD	Human Rights Defender
IO	Integrity Officer
IAR	Impact Assessment of Regulation
LG	Local Government Body
NA	National Assembly
Mass media	Mass media
MESCS	Ministry of Education, Science, Culture and Sports
MHTI	Ministry of High-Tech Industry
MIA	Ministry of Internal Affairs
MoJ	Ministry of Justice
MTEF	Medium Term Expenditure Framework
NGO	Non-Governmental Organization
OECD	Organization for Economic Cooperation and Development
OPS	On Public Service
OSC	On Civil Service
SCPEC	State Commission for Protection of Economic Competition
PS	Public Service
RA	Republic of Armenia
SRC	State Revenue Committee
SJC	Supreme Judicial Council
UNDP	United Nations Development Program
USAID	United States Agency for International Development

INTRODUCTION

On 3 October, 2019, the RA Government adopted Decision No.1332-N¹ on “Approving the Anti-Corruption Strategy of the Republic of Armenia and the Action Plan for its Implementation for 2019-2022” (hereinafter referred to as the Anti-Corruption Strategy or Strategy), and by the N 1351² of 24 August, 2022, made changes and additions to the Strategy.

The main goal of the Anti-Corruption strategy is the consistent implementation of the conceptual postulates and principles proclaimed by the Government of the Republic of Armenia in the field of fight against corruption, including identifying and eliminating the causes of corruption, instilling and spreading the attitude of intolerance among the public and public servants toward corruption, complete and continuous decrease in corruption.

The actions to be implemented are presented in five sectors, including a total of 43 actions: of which 7 refer to the Development of anti-corruption institutional system; 19 to Prevention of corruption; 10 to Investigation of corruption-related cases; 6 to Public awareness and anti-corruption education; and 1 to Monitoring, control and public communication.

Table 1. Sectors of the Anti-Corruption Strategy and the number of actions to be implemented in 2022

Sectors	Number of actions to be implemented in 2022 ³
Sector 1: Development of anti-corruption institutional system	7
Sector 2: Prevention of corruption	19
Sector 3: Investigation of corruption-related cases	10
Sector 4: Public awareness and anti-corruption education	6
Sector 5 Monitoring, control and public communication	1
Total to be implemented in 2022	43

The “Armenian Lawyers’ Association” NGO, “Europe in Law Association” NGO, the Union of Manufacturers and Businessmen of Armenia, in cooperation with the CSO Anti-Corruption Coalition of Armenia, and based on point 136 of the RA 2019-2022 Anti-Corruption Strategy, according to which, “in order to have a more comprehensive and complete assessment, civil society organizations can conduct independent monitoring and assessment every year”, have carried out the alternative public monitoring of the Actions of the Republic of Armenia Anti-Corruption Strategy and its Implementation Action Plan for 2019-2022 to be performed in 2022. **The field work of the monitoring was carried out in March – May, 2023.** Taking into account the fact that this report covers the performance of the activities to be performed in 2022, the last year of the RA 2019-2022 Anti-Corruption Strategy, it is therefore expected that it will assist the RA Ministry of Justice in the work of developing the Anti Corruption Strategy of the Republic of Armenia and the 2023-2027 Action Plan for Implementation of the Strategy, the deadline for adoption of which according to point 16 of the 2021-2026 Action Plan of the Government of the Republic of Armenia is scheduled on the 3rd ten-day period of October 2023⁴.

¹ The 03.10.2019, Decision No.1332-N is available at: <https://www.arlis.am/DocumentView.aspx?DocID=168051>

² The 24.10.2022 Decision No 1351-N is available at: <https://www.arlis.am/DocumentView.aspx?docid=168042>

³ The number of actions was calculated by combining the expected results in 2022 and verifiable indicators.

⁴ The 18.11.2021 Decision No. N 1902-L is available at https://www.arlis.am/Annexes/6/2021_N1902hav1.eng.pdf

METHODOLOGY

a. Monitoring Objectives

The objectives of monitoring and evaluation of the strategy action plans are:

- 1) to evaluate the implementation process and the level of final implementation of the actions of the RA Anti-Corruption Strategy and its Implementation Action Plan for 2019-2022 to be performed in 2022,
- 2) to find out the actions that were implemented, were implemented mostly, partially, were not implemented or the implementation process was suspended, their reasons, carry out procedural (quantitative) evaluations of these actions
- 3) to carry out (qualitative) assessments of the level of impact of actions.

b. Evaluation Table

The activities that were carried out in **2022 were monitored**; therefore, **the evaluation results refer to the correlation between the verifiable indicator of 2022 and the intermediate and final result of the strategic issue**. The results monitoring indicators of the strategy and action plan section were not monitored, as this does not involve monitoring the performance of the annual action plan, but rather the final evaluation of the performance of the entire strategy.

The study of actions of the Strategy to be implemented in 2022, as well as their expected results and verifiable indicators allows dividing the indicators evaluating the implementation of these actions into two groups, as shown below:

> Process (quantitative) indicators

Process indicators generally refer to actions that are aimed at completing certain procedures, such as submitting a draft legal document to the Prime Minister's Office or the National Assembly; conducting an analysis or study and publishing a report; introducing anti-corruption regulations and so on. Procedural indicators refer to output-level results and are evaluated on the basis of results-based monitoring. It is expected that the actions to be carried out in 2022, should already be completed by the time of the assessment, which is March-May 2023. It is necessary to note that the action plan mainly includes actions that assume process indicators. In the case of process indicators, the monitoring records the stage of the process.

The following evaluation categories have been separated for the performance evaluation of process indicators:

- **Action is implemented** – the action is assessed as “implemented” if evidence has been provided or made available to the monitoring team that the action was performed completely within the timeframe set by the Strategic Action Plan.
- **Action is mostly implemented** - the action is assessed as "mostly implemented" if the monitoring team has been provided with or had access to evidence that more than half of the action has been implemented, significant progress has been made, but it is not yet fully completed.
- **Action is partially implemented** – the action is assessed as "partially implemented" if the monitoring team has been provided with or had access to evidence that notable progress has been made in implementing the action, but it is not yet complete.
- **Action is not implemented** – the action is assessed as "not implemented" if the performance indicator of the action has not been performed or the Monitoring Group has not been provided with any information on the given action.

- **Action is suspended** – the action is considered "suspended" if circumstances became known during the performance of the action, which make the performance of the action impossible for a certain period of time and the suspension of the action is fixed in any legal document or decision.

For each sector, during this assessment, the expert team calculated a **performance indicator**, which is the ratio of "performed" activities in the given area to the total number of planned activities in the reporting period.

› **Impact level (Qualitative) indicators**

Qualitative indicators refer to **the results of the level of impact (qualitative)** and link action under Action Plans to expected or intermediate outcome at the level of strategic objectives. The strategic objectives are presented in point 55 of the Strategy: in total 9 objectives were proposed. These indicators will be evaluated by the experts of the Monitoring Group and will refer to the expected outcomes at the level of strategic objectives through the actions taken and the potential to address the objectives presented in the output situation. The objectivity and integrity of verifiable indicators will also be taken into account during this evaluation. The evaluation was carried out based on the basis of information extracted from official responses to questionnaires, received by the RA Ministry of Justice, as the competent body that develops the anti-corruption policy and implements monitoring and evaluation, which were sent to the bodies performing (co-performing) actions. The questions were related to sectoral anti-corruption institutional system, anti-corruption education and public awareness, corruption prevention and countering corruption. It is based on the information obtained as a result of the FGDs and desk research/document analysis as well. It is also worth noting that incomplete answers were provided to the information requests made to the Ministry of Justice of the Republic of Armenia regarding the aforementioned questionnaires (in the following text also referred to as "Questions") on the grounds that during the monitoring period the Ministry of Justice of the Republic of Armenia was busy with other commitments.

To assess the implementation of these indicators, three evaluation criteria were identified:

- **Action is performed** – the action is assessed as "performed" if the Monitoring Group was presented or had access to facts indicating that the implementation of the action provided the result expected at the level of the strategic objective.
- **Action is performed not completely** – the action is assessed as "performed incompletely" if the implementation of the given action has not provided the final or intermediate complete result expected at the level of the strategic objective (provided a partial result), or does not have a contributing factor to the complete achievement of that result, or the relevant bodies responsible for the implementation of the given action did not present facts to the Monitoring Group that would prove the complete implementation of the final or intermediate result expected at the level of the strategic objective.
- **Action is not performed** – the action is assessed as "not performed" if no significant measures have been taken to implement the given action, or the measures taken are not aimed at ensuring the final or intermediate result expected at the level of the strategic objective, or have not been a contributing factor to that result, or the relevant bodies responsible for the implementation of the given action have not presented facts to the Monitoring Group that would prove the implementation of the final or intermediate result expected at the level of the strategic objective.

For example: Building capacities of the bodies, non-governmental organizations responsible for drafting of Anti-Corruption Policy (Annex 2, Anti-Corruption Strategy Implementation Action Plan of the Republic of Armenia for 2019-2022, Strategic Objective: Transforming and developing the institutional anti-corruption system, Strategic Direction 1, Action 5). Did the

implementation of the action provide the expected result at the level of the strategic objective “Transforming and developing the institutional anti-corruption system” in 2022? The following two verifiable indicators have been set for 2022 for this measure: a) At least 40% of the employees of relevant subdivision elaborating the Anti-Corruption Policy of the Ministry of Justice of the Republic of Armenia have undergone training and b) At least 2 training has been conducted for the representatives of non-governmental organizations. In this case, the implementation of 2 trainings for NGOs in 2022 cannot objectively ensure the implementation of the expected result of the "Transforming and developing the institutional anti-corruption system" strategic objective "Capacity Development" of several dozen NGOs in the anti-corruption sector, which is an element of the institutional system. And at the same time, the relevant bodies responsible for this action did not present to the Monitoring Group such facts that would prove the realization of the expected final or intermediate results at the level of the strategic objective, also with regard to the Ministry of justice of the Republic of Armenia, which is an element of the institutional system. Therefore, the implementation of this action is assessed as **performed not completely**.

For each sector, during this evaluation, the expert team calculated a **performance indicator**, which represents the achievement of an intermediate or final result at the level of a given strategic problem through "performed" actions.

c. Evaluation Methods

The method combination approach, through combining qualitative and quantitative data, was used to achieve the monitoring goals. Data were collected from primary and secondary sources. Research methods include information inquiry, desk research/document analysis, including the Final Assessment and Monitoring Report of the Anti-Corruption Strategy of the Republic of Armenia and the Action Plan for its Implementation for 2019-2022” (hereinafter referred to as the Final Report), reports, conformity assessments and advisory opinions of international organizations, and FGDs. 4 FGDs in an inclusive and participatory format were organized, in which representatives of state departments responsible for the implementation of actions, other interested structures and CSOs, sector experts and lawyers participated. It is also worth noting that this report has refrained from fully reflecting the information available in the Final Report published by the Ministry of Justice of RA, which would burden the volume of the report, therefore, interested persons can study the mentioned Final Report in order to obtain more detailed information about the results of individual actions of the Strategy.⁵

Table 2. Number of State bodies and other interested structures that participated in FGDs and the number of participants

#	Name	Number of participants
1.	RA Ministry of Justice	3
2.	Corruption Prevention Commission	4
3.	National Assembly	2
4.	Office of the Prime Minister	1
5.	Civil Service Bureau at the Office of the Prime Minister	2
6.	RA Ministry of Education, Science, Culture and Sports	4
7.	RA Ministry of High-Tech Industry	4

⁵ The Final Evaluation and Monitoring Report of the Anti-Corruption Strategy and Actions for Its Implementation for 2019-2022 published by the Ministry of Justice of Armenia (Final Report) is available here:

https://www.moj.am/storage/files/pages/pg_7967694028641_AC_M-A_Report_final_2023-compressed_1_.pdf

8.	RA Ministry of Finance	2
9.	Police Headquarters of the Ministry of Internal Affairs of the RA	1
10.	The Prosecutor General's Office	2
11.	Anti-Corruption Committee	1
12.	Investigative Committee	2
13.	Supreme Judicial Council	2
14.	Human Rights Defender	1
15.	Central Bank	2
16.	Competition Protection Commission	2
17.	State Revenue Committee	1
18.	National Center for Education Development and Innovation	2
19.	EKENG CJSC	2
20.	Vanadzor Municipality	1
21.	Academy of Justice of the RA	1
22.	Academy of Advocates of the RA	1
23.	Public Administration Academy of the RA	1
24.	National Polytechnic University of Armenia	1
Total	24	45
CSOs, Experts, and Lawyers		
1.	CSOs, Experts, and Lawyers	12
Total	12	12

Table 3. Number of bodies and structures that submitted feedback, observations and proposals

#	Bodies that submitted feedback	Bodies that did not submit feedback	Bodies without observations	Bodies that submitted observations and proposals	Status of proposals and observations
1.	RA MoJ	RA SJC	RA MHTI	<i>RA MoJ</i>	<i>Partially Accepted</i>
2.	RA MHTI	RA NA	RA CB	<i>RA Prosecutor General's Office</i>	<i>Partially Accepted</i>
3.	<i>RA Prosecutor General's Office</i>	RA Ministry of Economy	RA Investigative Committee	<i>CPC</i>	<i>Mostly Accepted</i>
4.	CPC	RA MESCS	RA CEC	<i>CPC</i>	<i>Mostly Accepted</i>
5.	ACC	SCPEC	RA HRD Office	BCS of the Staff to the Prime Minister	<i>Mostly Accepted</i>
6.	BCS of the Staff to the Prime Minister	RA Ministry of Finance	Police Headquarters of the Ministry of Internal Affairs of the RA	Corporate Governance Center	<i>Mostly Accepted</i>
7.	<i>Corporate Governance Center</i>	<i>EKENG</i>		<i>RA Academy of Justice</i>	<i>Fully Accepted</i>
8.	RA Academy of Justice	National Security Service			
9.	RA CB				
10.	RA CEC				
11.	RA Investigative Committee				

12.	RA HRD Office				
13.	Police Headquarters of the Ministry of Internal Affairs of the RA				
Overall	13	8	6	7	
Total:	21		13		

d. Comparability of the methodology of the report with the methodology of RA Ministry of Justice

By the decision N 1332 of 3 October, 2019, the RA Government approved the RA Anti-Corruption Strategy and its Implementation Action Plan for 2019-2022. It consisted of the following three annexes: the Anti-Corruption Strategy, Actions for its Implementation, and Financial Assessment. The Government of the Republic of Armenia by Decision No. 1351-N of 24 August, 2022, made amendments and additions to Decision No. 1332-N of 3 October, 2019, and approved the new edition of the Anti-Corruption Strategy and provided a new methodology for monitoring the implementation of actions by Chapter 5. By the same decision, a new, fourth appendix was added, which refers to the formats of the **semi-annual monitoring report** of the 2019-2022 RA Anti-Corruption Strategy program of Actions and the **annual monitoring and evaluation report** of the Actions of the RA Anti-Corruption Strategy for 2019-2022. It should be noted that both the strategy with the new edition and the fourth annex will evaluate only the quantitative and not the qualitative results of the implementation of the actions of Anti-Corruption Strategy. The ALA and its partners have been conducting independent public monitoring of the RA Anti-Corruption Strategy and its Implementation Actions for 2019-2022 since 2020. And since then, have developed and continuously improved the methodology, which was acceptable by the MoJ and other interested departments. This report has also been developed on the basis of the methodology used during the previous monitorings.

Based on the foregoing, it should be emphasized that this report provides not only a quantitative, but also a qualitative assessment, which is not carried out by the RA MoJ. For example, for this purpose, vulnerable verifiable indicators are highlighted, which, although does not affect the quantitative assessment, may affect the qualitative assessment.

**MONITORING RESULTS OF THE ACTIONS OF THE REPUBLIC OF ARMENIA
ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION ACTION PLAN
FOR 2019-2022**

SECTOR 1: DEVELOPMENT OF THE ANTI-CORRUPTION INSTITUTIONAL SYSTEM

ACTION 1. Forming of the Corruption Prevention Commission and ensuring the regular operation thereof

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system.	No result is planned for 2022.	Moj CPC	Presence of positive references on the activities of the CPC in the reports of international specialized organizations (OECD) (2021/2022 report).	Action is IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY.

According to the final report published by the Ministry of Justice of the RA, the action was assessed as **completely implemented**, noting that the relevant reports of the OECD and GRECO have referred to the CPC. The final report also emphasized the highlighted shortcomings and problems. As a conclusion it was noted that in the OECD (2022), Anti-Corruption Reforms in Armenia: Pilot 5th Round of Monitoring Under the OECD Istanbul Anti-Corruption Action Plan (hereinafter referred to as the OECD 2022 report) and GRECO's 2023 interim compliance report regarding the fulfillment of obligations on corruption prevention in respect of members of parliament, judges and prosecutors (hereinafter referred to as GRECO 2023 report) there are positive references regarding the CPC.

Studying the OECD 2022 report within the framework of monitoring, it becomes clear that the report makes various references to the powers, functions, performed works, capacities, shortcomings, problems and results of the CPC. For example, according to OECD 2022 report, *“There was a delay in establishing the CPC, but it finally became operational in 2019, its human resources need to be further strengthened. It showed good effort in addressing public allegations about COI of high-level officials, but no dissuasive sanctions have been applied yet due to loopholes in legislation. ⁶ ... No statistics is yet available on implementation of COI rules and other restrictions.⁷...”* According to GRECO 2023 report *“GRECO also takes note of efforts deployed by the CPC to monitor compliance with the incompatibility requirements of MPs. It is satisfied that regular checks take place, following a specific methodology. However, no mention is made about the consequences of the finding of a violation.”⁸ GRECO reminds that this recommendation⁹ has partially been implemented in the Interim Compliance Report. GRECO noted that with respect to the institutional set-up of the system, the new rules foreseeing the reinstatement of a*

⁶ See: the OECD (2022), Anti-Corruption Reforms in Armenia: Pilot 5th Round of Monitoring under the OECD Istanbul Anti-Corruption Action Plan Report at: https://www.oecd-ilibrary.org/governance/anti-corruption-reforms-in-armenia_e56cafa9-en;jsessionid=XybFlBzfg3WExBEF9qWjoToWWWhJU6in76Tz5i2uG.ip-10-240-5-111, page 32.

⁷ See: the OECD (2022), Anti-Corruption Reforms in Armenia: Pilot 5th Round of Monitoring under the OECD Istanbul Anti-Corruption Action Plan Report at: https://www.oecd-ilibrary.org/governance/anti-corruption-reforms-in-armenia_e56cafa9-en;jsessionid=XybFlBzfg3WExBEF9qWjoToWWWhJU6in76Tz5i2uG.ip-10-240-5-111, page 32.

⁸ See the GRECO 2023 Second Interim Compliance Report on Armenia of the Fourth Evaluation Round Regarding Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors at: <https://rm.coe.int/grecorc4-2023-6-final-eng-2nd-interim-armenia-conf/1680aac534>, page 6.

⁹ See “Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors” regarding the fulfillment of obligations" by the Republic of Armenia. Recommendation 18 of the GRECO's Evaluation Report on Armenia of the Fourth Evaluation Round (2015) dated 25.02.2016 at: <https://rm.coe.int/16806c2bd8>

competition board in the process for the appointment of Corruption Prevention Commission (CPC) members would only apply for subsequent CPC formations. Four of the five commissioners were elected on the basis of the former rules that had been criticized in the Second Compliance Report¹⁰: Therefore, the positive measure to strengthen the operational independence of the CPC had not yet come into force¹¹.”

The mentioned above shows that GRECO, among other things, has reiterated its concern and criticism regarding the operational independence of the CPC, and the OECD has spoken about the scope and shortcomings of the work carried out under the mandate. At the same time, it is worth mentioning that the CSOs also raised their concerns¹² about the fact that the appointments of the first members of the CPC were made without a competitive process.

Regarding this action, the set **verifiable indicator** is problematic. In this regard, it is also necessary to emphasize that the lack of clarity in the assessment of this action is also caused by the definition of an incomplete and non-objective verifiable indicator. In particular, it is not clear what "positive reference" means and how it should be interpreted and measured. This indicator cannot objectively ensure the realization of the expected result of the strategic objective, "Transforming and developing the institutional anti-corruption system", which is an element of the institutional system CPC.

The Monitoring Group submitted questions to the MoJ on whether during the implementation of the action all the provided reports on obligations under the Istanbul Anti-Corruption Action Plan of the Member Countries of the OECD Anti-Corruption Network for Eastern Europe and Central Asia and GRECO's Reports during 2019-2022 on Armenia of the Evaluation Rounds Regarding Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors were studied. The purpose of the questions was to find out how the MoJ will combine the negative and positive references that took place during the implementation of the "Anti-Corruption Strategy of the Republic of Armenia and the Action Plan for its Implementation for 2019-2022" in order to carry out a final and objective evaluation of the action. The MoJ did not provide an answer to the aforementioned.

The Civil Society has participated in public discussions. The drafts laws were put for public discussion.

In such conditions, although according to the presented data, the action quantitatively was mostly implemented, but the strategic task (result) was not completely implemented in terms of impact level (qualitative) results, because the provision ensuring the operational independence of the CPC is still not fully implemented.

According to the results of process (quantitative) evaluations, the action is evaluated as IMPLEMENTED.

¹⁰ In the 4th Evaluation Round Report on Armenia adopted on 6 December, 2019, among others (including the judicial and prosecutorial system), referring to the independence of the Corruption Prevention Commission, GRECO noted, "The new law adopted by the National Assembly removes the Competition Board from the process of appointment of members of the CPC and introducing a system of direct nomination of candidates. The main concern of such a model is the significant risk of polarization. This is an important factor for anti-corruption bodies, as their isolation from political interference and influence is the main principle of ensuring the effectiveness of the bodies. CSOs are currently not represented in the nomination or selection process. The government and the ruling parliamentary faction may control the majority of the CPC. GRECO urges the authorities to ensure the independence of the CPC, particularly through a balanced and stable composition and transparent procedures."

¹¹ See the GRECO 2023 Second Interim Compliance Report on Armenia of the Fourth Evaluation Round Regarding Corruption Prevention in Respect of Members of Parliament, Judges and Prosecutors at: <https://rm.coe.int/greacor4-2023-6-final-eng-2nd-interim-armenia-conf/1680aac534>, point 67

¹²<https://iravaban.net/en/230328.html>

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

ACTION 2. Formation of an anti-corruption law enforcement body vested with the functions of revealing and investigating corruption-related crimes and granted with sufficient guarantees of independence - the Anti-Corruption Committee and ensuring normal functioning

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	The pre-trial criminal proceedings for corruption crimes are carried out by the Anti-Corruption Committee. Territorial subdivisions of Anti-Corruption Committee have been formed.	MoJ, Prosecutor General's Office, Investigative Committee, Anti-Corruption Committee	The Central Body of the ACC is provided with the necessary territorial and material resources, is provided with the necessary premises and material means, at least 50% of the staff of the Central Body of the ACC has been formed, 40% of the staff has been trained. A separate line for the funding of the ACC is provided for in the State Budget and the MTEF. At least 2 territorial divisions were established; the facilities, as well as material and technical conditions are provided.	Action is MOSTLY IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, because only the formation of territorial subdivisions was not carried out among the actions provided for by the verifiable indicators.

In the framework of the above, the RA Anti-Corruption Committee reported that 32 of the 40 autonomous positions assigned to the Committee were filled in 2022, and 40 of the 60 performing operative-investigative functions were filled. According to the same source, 25 of the 32 employees of the RA Anti-Corruption Committee occupying autonomous positions, and 39 of the 40 employees performing operative-investigative functions, underwent various trainings with the participation of both Armenian and international experts during 2022.

According to the information provided by the Anti-Corruption Committee, representatives of the civil society were involved in the training processes.

In such conditions, although according to the presented data, the action quantitatively was mostly implemented, but the strategic task (result) was not completely implemented in terms of impact level (qualitative) results, because the territorial divisions were not formed during the reporting period.

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

ACTION 3. Establishment of specialized anti-corruption court and ensuring of specialized investigation in anti-corruption cases

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	<p>Specialized anti-corruption court has been formed.</p> <p>Separate judges have been appointed in the Civil Court of Appeals to review judicial acts subject to appeal in anti-corruption civil cases, and in the Criminal Court of Appeal, separate judges were appointed for the review of judicial acts subject to appeal in cases of corruption crimes.</p> <p>Sufficient human, administrative and material resources are ensured for ensuring the operation of specialized courts.</p> <p>Judges of specialized anti-corruption court continuously undergo training.</p>	MoJ, SJC, Academy of Justice	<p>Educational curricula for preparation and training of judges with anti-corruption specialization have been elaborated and approved (2022).</p> <p>The first composition of judges of the anti-corruption court has been formed.</p> <p>Judges reviewing judicial acts subject to appeal in civil anti-corruption cases at the Civil Court of Appeal and judges reviewing judicial acts subject to appeal in cases of corruption crimes in the Criminal Court of Appeal were appointed (2022).</p> <p>At least 50% of judges have received relevant professional training (2022).</p>	<p>Action is MOSTLY IMPLEMENTED</p> <p>The strategic objective (outcome) IS PERFORMED NOT COMPLETELY</p>

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, because only the professional training of judges was not carried out among the actions provided for by the verifiable indicators.

The Monitoring Group submitted to assess the qualitative impact of the trainings conducted for the specialized anti-corruption court, as well as for the judges investigating cases of corruption crimes. The

above interested parties did not provide an answer to the mentioned; therefore, the impact of the activity in terms of training was not evaluated due to the lack of information.

The Civil Society was involved in the process; the draft was published on the Unified Website for Publication of Legal Acts' Drafts for public discussion¹³.

In such conditions, although according to the presented data, the action quantitatively was mostly implemented, but the strategic task (result) was not completely implemented in terms of impact level (qualitative) results, because the professional training of judges was not carried out during the reporting period.

According to the results of process (quantitative) evaluations, the action is evaluated as MOSTLY IMPLEMENTED.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

ACTION 4. Establishment of a Department carrying out oversight over the investigation of corruption crimes has been established in the Prosecutor General's Office of the Republic of Armenia

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	Trainings for prosecutors of the Department carrying out oversight over the investigation of corruption crimes established in the Prosecutor General's Office of the Republic of Armenia have been organized with a view to improve their specialization	Prosecutor General's Office of the RA, MoJ, Academy of Justice	At least 60% of prosecutors carrying out oversight over the investigation of corruption crimes have undergone a relevant training (2021).	Action is IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action is evaluated as **completely implemented**, 90% of prosecutors of the Department carrying out oversight over the investigation of corruption crimes have undergone a relevant training. According to the information provided by the RA Prosecutor General's Office, the prosecutors of the department of control over the legality of pre-trial proceedings of the RA Anti-Corruption Committee participated in a number of courses and meetings on the fight against corruption in order to improve their professional qualities, study international experience and effectively apply the knowledge gained in practice.

¹³ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4767>

The Monitoring Group submitted questions to the Ministry of Justice to assess the qualitative impact of the trainings conducted for the prosecutors of the Department carrying out oversight over the investigation of corruption crimes.

Civil Society was not involved in this process.

In such conditions, although according to the presented data, the action quantitatively was implemented, but the strategic task (result) was not completely implemented in terms of impact level (qualitative) results, because the baseline data does not allow evaluating its effectiveness.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.:

ACTION 5. Building capacities of the bodies, non-governmental organizations responsible for drafting of Anti-Corruption Policy

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	<p>Within the framework of cooperation with NGOs, training programs based on the assessment of their needs are being developed by the CPC.</p> <p>With the support of donor organizations, trainings of representatives of NGOs are carried out. NGO representatives regularly undergo training.</p> <p>The employees of relevant subdivision elaborating the Anti-Corruption Policy of the MoJ of the RA regularly undergo training.</p> <p>The functions of competent subdivisions are clearly differentiated.</p>	CPC, MoJ	<p>At least 40% of the employees of relevant subdivision elaborating the Anti-Corruption Policy of the Ministry of Justice of the Republic of Armenia have undergone training. (2022)</p> <p>At least 2 trainings have been conducted for the representatives of non-governmental organizations. (2022).</p>	<p>Action is NOT IMPLEMENTED</p> <p>The strategic objective (outcome) IS NOT PERFORMED</p>

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, and employees of relevant subdivision elaborating the Anti-Corruption Policy of the Ministry of Justice of the Republic of Armenia have undergone training. With the support of donor organizations, trainings on anti-corruption topics were held for business sector NGOs in Yerevan, as

well as in Strasbourg, with the participation of 2 NGOs. According to additional information provided by the Ministry of Justice, other trainings organized by partners were also carried out for NGOs. However, as such, training programs for NGOs have not been developed.

The Monitoring Group submitted questions to the Ministry of Justice to assess the qualitative impact of the trainings conducted for the employees of the relevant subdivision of the MoJ of the RA elaborating the Anti-Corruption Policy. The MoJ did not provide a full response to the aforementioned; therefore, the impact of the action in terms of training was not evaluated due to the lack of complete information.

At the same time, the set **verifiable indicator** is problematic. The implementation of 2 trainings for NGOs cannot objectively ensure the implementation of the expected result of the strategic objective - "Capacity Development" of several dozen NGOs in the anti-corruption field, which is an element of the institutional system. At the same time the relevant bodies responsible for this activity did not present to the Monitoring Group such testifying facts that would prove the implementation of the final or intermediate results expected at the level of the strategic objective, also in terms of the Ministry of Justice of RA, which is an element of the institutional system.

According to the results of process (quantitative) evaluations, the action is evaluated as NOT IMPLEMENTED.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is NOT PERFORMED**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

ACTION 6. Ensuring the regular operation of the donor co-ordination mechanism

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	Regular discussions are held with the donors and the interested bodies in order to coordinate the work of the donors. The Council of Anti-Corruption Policy holds donor coordination meetings as needed to coordinate the work of donors in the anti-corruption field.	MoJ	At least 1 donor coordination sitting-discussion to coordinate the work of donors has been held with the latter and the interested bodies. (2021-2022pp.): The engagement of donors is distributed and co-ordinated proportionately to the process of implementation of the Anti-Corruption Policy and its implementation actions. (2021- 2022).	Action is NOT IMPLEMENTED The strategic objective (outcome) IS NOT PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, although meetings were held regularly with donors, and interested bodies were also involved, but simultaneous meetings of donors and interested bodies were not regular. Monitoring

results show that during 2022, one meeting of the Council of Anti-Corruption Policy took place.¹⁴ During which the actions implemented in the anti-corruption sphere in RA, the recommendations of GRECO and OECD regarding the results of the 2021 evaluation of RA were discussed. In addition, the Monitoring Group was not provided with such testifying facts that would prove the implementation of this action. Also, questions were submitted to the MoJ about whether there is a donor financial involvement plan or other document, based on which the proportional distribution and coordination of donor involvement in the process is visible, as well as the existence of financial expenditure report. The MoJ did not provide a full answer to the mentioned

Civil Society was not involved in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **NOT IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **NOT PERFORMED**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

ACTION 7. Appointment of persons in charge of anti-corruption programs (individuals or units) in the Staff of the National Assembly, the Staff of the Prime Minister, independent and autonomous bodies, investigative bodies, the Judicial Department, bodies of the state administration system and local governments, and fixing their functions in relevant documents

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Transforming and developing the institutional anti-corruption system	The necessary legal bases for the appointment of persons in charge of anti-corruption programs (persons or divisions) in the Staff of the National Assembly, the Staff of the Prime Minister, independent and autonomous bodies, investigative bodies, the Judicial Department, and the bodies of the state administration system have been defined. Persons in charge of anti-corruption programs (employees of the responsible department) have been appointed, their duties arising from the implementation of anti-corruption programs and international obligations in the anti-corruption field are fixed in their job descriptions or in relevant individual legal acts. Information on Persons in	Staff of the National Assembly, Staff of the Prime Minister Independent bodies, Autonomous bodies, Investigative bodies, Bodies of the state administration system, Municipalities, Academy of Justice, NGOs.	Persons in charge of anti-corruption programs (individual/unit) have been defined by individual legal act or job descriptions in the Staff of the National Assembly, the Staff of the Prime Minister, independent and autonomous bodies, investigative bodies, the Judicial Department, the bodies of the state administration system, (2022).	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

¹⁴ The sitting took place on 16 February, 2022. See at: <https://anti-corruption.gov.am/am/news?content.pid=4>

	charge of anti-corruption programs (employees of the responsible department) is published on the official websites of relevant bodies and on the website of the Anti-Corruption Policy Council.			
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, the necessary regulations for the operation of the institute of anti-corruption program officers were provided by the legislative act. There is no person in charge of the Anti-corruption program appointed in the staff of the CPC and the Prime Minister. The publication of data on the persons in charge of anti-corruption programs is ensured on the websites of the MoJ and the Anti-Corruption Policy Council. The publication process on the websites of other bodies has not yet been completed.

The Monitoring Group examined the websites of different relevant bodies, where the persons in charge of anti-corruption programs are listed.

Thus, the institute of the person in charge of anti-corruption programs assumes, in addition to the functions of relevant persons performing public or community service or holding public office in State and Local Government bodies, to define the functions of coordination and presentation of the works implemented or to be implemented with anti-corruption strategies, programs and sectoral international obligations. However, at the same time, there is no legal basis within which persons in charge of anti-corruption programs should have undergone a qualitative (professional) check before being appointed.

From this point of view, the practice according to which the appointment of anti-corruption program officers in various related bodies is assessed as problematic because it was preceded by a quality check of the relevant candidates, to find out whether they have relevant knowledge and skills in the fields of anti-corruption and integrity: how their appointment took place, especially since there are bodies where the position held by these persons and the main function arising from it is different.¹⁵ At the same time, as reported by the Civil Service Bureau, it should be noted that the passports of civil service positions of anti-corruption program officers and their substitutes includes the relevant functions and powers defined by the Law on Public Service.

The Civil Society was not included in this process with separate actions; the draft was published on the Unified Website for Publication of Legal Acts' Drafts for public discussion.¹⁶

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action did not fully contribute to the transforming and developing the institutional anti-corruption system.

¹⁵ For example, the temporary Acting Head of the Legal Acts Development and Examination Department of the Judicial Department is also in charge of anti-corruption programs. See at: <https://court.am/hy/central>

¹⁶ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4314>

Process (quantitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	7	100%
OF WHICH IMPLEMENTED	2	28.57%
OF WHICH MOSTLY IMPLEMENTED	3	42.86%
OF WHICH PARTIALLY IMPLEMENTED	0	0%
OF WHICH NOT IMPLEMENTED	2	28.57%

Impact level (qualitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	7	100%
OF WHICH PERFORMED	0	0%
OF WHICH PERFORMED NOT COMPLETELY	5	71.43%
OF WHICH NOT PERFORMED	2	28.57%

SECTOR 2. PREVENTION OF CORRUPTION

ACTION 8. Developing sectoral Action Plans based on the corruption risks assessment

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Overcoming administrative corruption through identification of sectoral corruption risks and reduction thereof, introduction and continuous improvement of tools of electronic democracy.	The concept for assessment, analysis and management of corruption risks has been developed and submitted to the Government for approval.	CPC, MoJ, NGOs	The Government has approved the concept for assessment, analysis and management of corruption risks (2022).	Action is PARTIALLY IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**; the concept for assessment, analysis and management of corruption risks is under development.

According to the CPC, the partial implementation of the action is due to the fact that the CPC does not have the authority to develop the corruption risk assessment methodology. In particular, the Draft Concept of Corruption Risk Management in the State and Local Government Bodies, circulated on 15 June, 2022, was considered problematic from the point of view of the lack of an authorizing norm, as a result of which the process was suspended until the circulation of the package of legislative amendments.

According to the results of the monitoring, within the framework of the 4th component of the EU Twinning Project "Fostering Integrity and Preventing Corruption in the Public Sector in Armenia", the Corruption Prevention Commission has developed the methodology for assessing corruption risks in enterprises with state participation. In order to develop the concept of corruption risk management in state bodies and local governments, both the main international standards (OECD, USAID, UNDP, and ISO) and the experience of different countries (Korea, the Netherlands, Slovenia, Ukraine, Latvia, Albania, etc.) were studied. The study of the CPC has shown that there are different methodologies for assessing corruption risks in international practice, which have proven their viability in different countries, but each of them is adapted to local conditions, taking into account the context of each country. However, there is no unified single methodology, as manifestations of corruption and anti-corruption mechanisms, as well as the context of policy implementation, vary across countries and situations. Taking into account the experience used in different countries, as well as the studies conducted by the CPC with international experts, the model of the International Organization for Standards for was chosen as the applicable standard for risk assessment, and which is easily integrated into almost all management systems.

Referring to the question of whether an assessment of the capacities of the CPC was carried out, taking into account the fact that the capacities and resources are not assessed, but at the same time the powers

and functions of the CPC are increasing, it was noted that an assessment of the capabilities, resources and needs was not carried out.

The Civil Society was not included in this process with separate actions; the draft was published on the Unified Website for Publication of Legal Acts' Drafts for public discussion¹⁷:

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action aimed at overcoming administrative corruption through identification of sectoral corruption risks and reduction thereof, were not fully implemented.

SECTOR 2.1. PREVENTION OF CORRUPTION (Integrity)

ACTION 9. Formation of mechanisms for carrying out oversight over observance of the rules of integrity of persons subject to appointment to state positions, including candidates of the Constitutional Court, candidates for prosecutors and judges, candidates for investigators, prosecutors and judges included in promotion lists, as well as members of autonomous and independent bodies

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	The Commission for the Prevention of Corruption conducts studies on observance of the rules of integrity of persons subject to appointment to state positions in the cases and under the procedure prescribed by the Law "On Public Service"; candidates for members of the Supreme Judicial Council, judges, including candidates for the Constitutional Court, in the cases and under the procedure prescribed by the Constitutional Law "Judicial Code of the Republic of Armenia"; and candidates for prosecutors, and investigators in the cases and under the procedure prescribed by the Law "On Prosecutor's Office", and provides advisory opinions to relevant persons on the basis thereof.	MoJ, CPC	The selection / appointment process of investigators included in the promotion lists of investigators, as well as members of autonomous and independent bodies includes an integrity study phase (2022). In 2022, the Commission for the Prevention of Corruption submitted at least 150 opinions on observance of the rules of integrity by persons seeking to hold a state position in the Republic of Armenia.	Action is PARTIALLY IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

¹⁷ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4563>

	<p>The draft laws "On making amendments and supplements to the laws on CPC" and related laws" have been elaborated and submitted to the to the National Assembly of the Republic of Armenia, whereby the Corruption Prevention Commission has been vested with the competence of conducting studies on observance of the rules of integrity of persons subject to appointment to state positions, including candidates of the Constitutional Court, candidates for prosecutors and judges, candidates for investigators, prosecutors and judges included in promotion lists, as well as members of autonomous and independent bodies, and with the competence of rendering advisory opinions to relevant persons on the basis thereof.</p>			
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**. In the course of 2022, the CPC conducted studies on observance of the rules of integrity of 512 persons seeking to hold to state positions, as a result of which 505 advisory opinions were rendered to relevant bodies. The package of draft legislative acts defining the mechanisms of integrity checking of candidates of investigators included in promotion lists, as well as members of autonomous and independent bodies during the selection/appointment process was developed.

According to the CPC, this action was supplemented by the decision of the RA Government No. 1351 of 24 August, 2022, entrusting the CPC to carry out a study on the integrity of candidates for investigators, included in promotion lists of investigators, as well as candidates for members of autonomous and independent bodies, and based on them authority to issue advisory opinions to appointing/electing persons. Despite this, the relevant legislative change was not implemented, as a result of which the CPC did not conduct an integrity study of the persons in the mentioned circle.

According to the monitoring results, CSOs and experts claim that it is necessary to publish the final part of the opinion on integrity checking, hiding the personal data, before the appointment of the person undergoing the integrity checking, which will also ensure the public impact and evaluate the effectiveness of this institution, considering the fact that candidates who received a negative opinion are also appointed to high-ranking positions. In addition, it is necessary to expand the scope of persons who are subject to integrity checking, in particular, to include persons holding public positions, such as ministers, deputy ministers, heads of bodies under the Prime Minister, etc., as well as to introduce mechanisms for current integrity checking, for example for investigators, prosecutors and other subjects.

One of the **issues raised** was the lack of digitalization of the integrity checking phase. As the CPC reported the new declaration system is being developed currently, which also includes a section for the

integrity study. Instead of filling out a spreadsheet using the current Excel program, individuals will be able to log into the system and fill out the questionnaire electronically. The issue of cooperation between the Ministry of Justice and the Corruption Prevention Commission **was also raised**, because the MoJ is planning legislative changes in this area, which according to the representative of the CPC, they have not agreed with them, despite the contrary statements of the MoJ:

The Civil Society was not included in this process by separate actions: A draft law in order to entrust the development of the methodology of assessment of corruption risks in the RA state administration system and local governments to the CPC was developed, which was only put for public discussion on the Unified Website for Publication of Legal Acts Drafts.¹⁸

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action aimed at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, were not fully implemented.

ACTION 10. Assessment of the effectiveness of the enforcement of the Law “On Public Service” and Law “On Civil Service”

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	Assessments have been conducted for the purpose of verifying the process of enforcement of the Law “On Public Service” and Law “On Civil Service”. Based on the studies, a package of recommendations has been submitted to the Prime Minister of the RA; the results have been discussed at the sitting of the Anti-Corruption Policy Council.	Bureau of Civil Service of the Staff to the Prime Minister, CPC, NGOs.	The package of recommendations developed based on the results of the evaluation of the implementation of the laws “On Public Service” and “On Civil Service” was discussed at the session of the Anti-Corruption Policy Council, and relevant instructions were given to the interested bodies (2022).	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**, the transparency of conducting electronic tenders, and the compliance with the requirements of the laws “On Public Service” and “On Civil Service” were assessed through the

¹⁸ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4563>

Information Platform, in 2022. The existing solutions of the Information Platform provide an opportunity to ensure the transparency of tenders, and to neutralize corruption risks.

According to the monitoring results, one meeting of the Anti-Corruption Policy Council was held in 2022¹⁹, during which the package of recommendations developed on the basis of the results of the evaluation regarding the implementation of the laws of the Anti-corruption Policy were not discussed.

Civil Society was not involved in this process.:

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**. The process of the measures of creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity carried out within the framework of this action was not fully implemented.

ACTION 11. Formation and launch of the Institute of Ethics Commissions and Integrity Officers in compliance with the Law "On Public Service"

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	The legislative package defining the competences of coordinating the activities of Integrity Officers was developed and presented to the National Assembly. The matter of ensuring the toolkit necessary for exercising in practice by ethics commissions and Integrity Officers the functions thereof has been analyzed and assessed. The Corruption Prevention Commission developed and adopted guidelines for ethics commissions and IOs. Training programs have been elaborated, and training courses have been organized for the members of the ethics commission and Integrity Officers. IOs were provided with the necessary tools for the practical implementation of their functions.	Bureau of Civil Service of the Staff to the Prime Minister, CPC, MoJ, NGOs.	The legislative package defining the competences of coordinating the activities of Integrity Officers was developed and presented to the National Assembly of the RA (2022). At least 2 guidelines for the activities of ethics commissions and Integrity Officers have been elaborated (2022). IOs have relevant toolkit ensuring their activities (2022). At least 1(one) training has been conducted in state bodies (2022).	Action is NOT IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

¹⁹ The session was held on 16 February, 2022, <https://anti-corruption.gov.am/am/news?content.pid=4>

According to the final report published by the Ministry of Justice of RA, the action was assessed as **not implemented**. Trainings were conducted for IOs; the issues of effective implementation of functions of IOs were discussed. Guidelines for ethics commissions and IOs have not been elaborated and approved. The CPC has not developed the legislative packages defining the competences of coordinating the activities of Integrity Officers.

The Monitoring Group submitted questions to the MoJ on whether there is an analysis and assessment on the issue of providing the tools necessary for the IOs to carry out their functions in practice; and what were the conclusions; whether there is an assessment of the effectiveness of the commission of integrity and ethics, and what the results are.

According to the Bureau of Civil Service, the guidelines are not ready yet; drafts have been developed and submitted to the CPC. At the same time, it was reported that, being the main executor of the 11th action, according to the edition until 24 August, 2022, of the Annex 2 approved by the Government Decision N 1332-L of 3 October, 2019,²⁰ the BCS did not have the opportunity to carry out work on the analysis and evaluation of the tools necessary for the Ethics Commissions and IOs to carry out their functions in practice, because this process was hindered by the delay in adopting the model rules of conduct for public servants. In these conditions, not having the activity guidelines especially for ethics commissions, and for the Integrity Officers regarding the issues in terms of rules of conduct and service examinations, it was not possible to analyze and evaluate the necessary tools for their activity, as well as to evaluate the effectiveness of their activity.

One of the main problems raised during the FGDs, is that IOs are not addressed, they are not trusted, there is no central body to coordinate IOS, and there are no real guarantees of their independence.

The Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **NOT IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **NOT PERFORMED**, the measures carried out within the framework of this action aimed at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, were not implemented.

ACTION 12. Prescribing model rules of conduct provided for by the Law “On Public Service” for public servants, rules of conduct of civil servants, rules of conduct of persons holding public office (except MPs, judges, members of the Supreme Judicial Council, prosecutors, investigators), heads of communities, their deputies, heads of administrative districts of Yerevan community, their deputies

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction	Based on the model rules of conduct of public servants, the rules of conduct of civil servants were adopted and	CPC, Bureau of Civil Service of the Staff to the Prime	The model rules of conduct of the public servant were adopted (2022).	Action is PARTIALLY IMPLEMENTED

²⁰The decision approved the Republic of Armenia Anti-Corruption Strategy and its Implementation Action Plan for 2019-2022.

of relevant mechanisms for ensuring accountability, transparency and integrity.	published. Based on the study of international experience, the rules of conduct of the heads of state administration bodies and their deputies were developed and adopted, and the authorizing norms were defined in parallel.	Minister, MoJ, Bodies of the state administration system.	On the basis of the model rules of conduct of public servants, the rules of conduct of the civil servants were adopted. (2022). Rules of conduct of persons holding public office (except MPs, judges, members of the Supreme Judicial Council, prosecutors, investigators), heads of communities, their deputies, heads of administrative districts of Yerevan community, and persons holding the positions of their deputies (2022). The rules of conduct of the public servant, civil servants, the heads of state administration bodies and their deputies were published on the official websites (2022).	The strategic objective (outcome) IS PERFORMED NOT COMPLETELY
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**, the model rules of conduct of a public servant and the rules of conduct of a civil servant based on it were established, their publicity was ensured, and a number of trainings were conducted.

According to the results of the monitoring, the rules of conduct of the heads of state administration bodies and their deputies have not yet been defined. Nor the rules of conduct (Code of Conduct) of persons holding public office (except MPs, judges, members of the Supreme Judicial Council, prosecutors, investigators), heads of communities, their deputies, heads of administrative districts of Yerevan community, and persons holding the positions of their deputies are defined. According to the CPC, the work on the development of the Code of Conduct started before 2022 and it is planned that it will be approved in the second half of 2023.

The Civil Society was included in this process with separate actions; the draft decision “On the Approval of the Model Rules of Conduct Public Servants” was published on the Unified Website for Publication of Legal Acts’ Drafts for public discussion²¹:

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action aimed

²¹ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4098>

at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, were not fully implemented.

ACTION 13. Prescribing rules of conduct of the deputy and investigator, review of the rules of conduct for prosecutors and judges

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(is)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	Taking into account the model rules of conduct of a public servant, the drafts of the rules of conduct of the deputy and the investigator were revised and approved. The rules of conduct for prosecutors and judges have been revised, taking into account the standard rules of conduct for public servants.	NA, CSO, ACC, CPC, Prosecutor General's Office, SJC	The rules of conduct of the deputy and investigator developed on the basis of international experience have been approved. The rules of conduct for prosecutors and judges have been revised, At least 2 trainings were conducted for investigators and deputies.	Action is PARTIALLY IMPLEMENTED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**. Taking into account the model rules of conduct of a public servant, the rules of conduct of the investigator were approved. The rules of conduct for MPs, and ACC investigators have been developed, and the rules of conduct for prosecutors will be updated and approved after the approval of the Guidelines. The rules of conduct for judges have been revised. Regarding the trainings: trainings on the rules of conduct were held for prosecutors; trainings for other officials will be held after the code of conduct is approved.

According to the results of the monitoring, separate rules of conduct of the MPs have not yet been adopted, although the draft has been developed. The Investigative Committee adopted the rules of conduct on 14 June, 2022. The ACC, based on the publication of the model rules of the CPC, has developed model rules of conduct for persons holding autonomous positions, but they are currently in the process of revision. According to the position of the ACC and the Prosecutor General's Office, the review of the Code of Conduct for the ACC investigators and prosecutors is being delayed, as it can be done after the approval of the Guidelines by the CPC.

Regarding this action, **one of the problems raised** by the CPC is that although the CPC has the function of interpreting the principles of behavior of persons holding public office and public service position according to the law of the same name, as well as ensuring the uniformity of the model rules of conduct of public servants, it does not have the authority as such, with which it will be able to ensure the imperative character of those rules. In particular, according to the Law on Public Service, the Investigative Committee is not obliged to accept the rules of conduct developed by the CPC as a model. The same applies to the National Assembly. It is necessary to make a legislative change and define the scope of powers of the parties in the light of the above. At the same time, the **prescribed verifiable indicator** is problematic. The implementation of 2 trainings for investigators and MPs cannot objectively

ensure the implementation of the strategic objective “creating a decent and faithful image of a public servant”.

The Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action aimed at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, were not fully implemented.

ACTION 14. Ensuring a merit-based system in the sector of civil service

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	The procedures for formation of competition commissions for holding a competition for civil service position have been revised, nullifying political influence on the process of engagement of civil servants, Clear criteria and scope of impact of anti-corruption regulation have been prescribed.	Bureau of Civil Service of the Staff to the Prime Minister of the Republic of Armenia, NGOs	Legal acts regulating the relations on establishing the procedure and criteria for the formation of Competition Commissions were adopted (2022). At least 10 competitions were held according to the new procedures (2022).	Action is NOT IMPLEMENTED . The strategic objective (outcome) IS NOT PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **not implemented**. The requirements set for the formation of Competition Commissions were assessed with the support of the experts of the EU-funded “Support to Further Implementation of Civil Service Reform in Armenia” Twinning Project; the conformity of the composition of the Competition Commissions running through the Information Platform with the requirements of legal acts was studied; existing risks were assessed in order to make changes in legal acts. Trainings on topics related to the role and responsibilities of candidates for members of the commission during the interview stage of civil service competitions were conducted.

According to the results of the monitoring, the legal acts regulating the relations on establishing the procedure and criteria for the formation of the Competition Commissions were not developed and adopted, therefore no competitions were held according to the new procedures.

At the same time, it should be noted that although the verifiable indicator of the activity is the adoption of the legal acts regulating the relations on establishing the procedure and criteria for the formation of competition commissions, however such a requirement is not provided by the current Law on Civil Service. Article 10, Paragraph 22 of the Law stipulates a provision according to which the procedure for holding a tender is determined by the Government. The provisions regarding the formation of the interviewing committee for filling the vacant position of the CS, the officials included in the committee

and other candidates are defined in paragraphs 13-14 of the same article. An exception is provided only for the commissions formed to fill the vacant position of the Secretary General. The BCS proposed to revise the provision of the verifiable index provided for in the action "Ensuring merit-based system in the field of civil service".

It should also be added that in 2022, trainings were organized for the candidates for the members of the commission of the interview stage of the competitions held to fill vacant positions in the civil service of relevant bodies. The legal regulations of the interview stage and the existing solutions of the Information Platform currently provide an opportunity to ensure the transparency of competitions and the formation of a merit based system, in particular; evaluation of the interview by committee members in the presence of the contestant immediately after the end of the interview, the video recording of the interview stage is one of the important tools that are meant to increase the applicant's confidence towards the members of the commission.

Civil Society was not involved in this process.

In such conditions, although according to the presented data, the action has not been carried out in quantitative terms, but according to the (qualitative) results of the impact level, the strategic task (result) has been implemented, because the goal, which was set as the basis of the action, has been mostly implemented.

According to the results of process (quantitative) evaluations, the action is evaluated as **NOT IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, the measures carried out within the framework of this action aimed at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, were implemented.

SECTOR 2. PREVENTION OF CORRUPTION

2.2. PREVENTION OF CORRUPTION (declaration, gifts, impact assessment of regulation, procurement, private sector, beneficial owners, protection of economic competition)

ACTION 15. Increasing the effectiveness of the system of impact assessment of anti-corruption regulation

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Enhancing the role of the institute of regulatory impact assessment	The expediency of introducing the systems of impact assessment of anti-corruption regulation and anti-corruption expertise considering the CPC as an authorized body were discussed.	MoJ, CPC, NGOs	The expediency of introducing the systems of impact assessment of anti-corruption regulation and anti-corruption expertise considering the CPC as an authorized body were discussed (2021-2022).	Action is PARTIALLY IMPLEMENTED, IMPLEMENTATION IS SUSPENDED The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented** on the grounds that an approach was adopted to replace the assessment of the impact regulation with the anti-corruption expertise of draft legal acts and to give the final solution aimed at solving the issue within the framework of the Anti-Corruption Strategy for 2023-2026. Other details related to the implementation of the action are presented in the Final Report.

In response to the question presented by the Monitoring Group, regarding as a result of the discussion with the interested parties, how, on the basis of what analyses/needs/tools the decision was made, to apply anti-corruption expertise of draft legal acts and that it is more appropriate to consider the CPC as the authorized body, the MoJ informed that it follows from the legal regulations of the Annex to the decision No. 2075-N of the Government dated 17 December, 2020, that only the bodies of the state administration system are the bodies implementing the Regulatory Impact Assessment (RIA). While the CPC is not a body of the state administration system, therefore, in order to define the CPC as an authorized body in this field, it is necessary to make appropriate additions to the mentioned normative legal acts, reserving the relevant powers to the Corruption Prevention Commission. In 2022, within the framework of the cooperation between the CPC and UNDP, with the involvement of a Korean expert, the Concept of possibilities of implementation in Armenia of the corruption risk assessment system and the tools used of the Republic of Korea was developed. By which it was proposed and confirmed by the study of international experience that it is more appropriate to use the term "anti-corruption assessment of laws" ("Anti-Corruption Assessment of Laws"("Corruption Proofing"). As a result of the discussions, a decision was made to address the introduction of anti-corruption impact assessment systems within the framework of the Public Administration Reform Strategy.

In response to the questions, whether there were results of the baseline survey of the RIA in the RA or other baseline data, on the basis of which the action was planned, and whether an assessment of the capacities of the CPC and the mentioned requested functions was carried out, no reference was made by the CPC.

In response to the question raised by the Monitoring Group during the FGD, whether the NGOs planned as co-implementers also participate in the discussion, in what way and how inclusiveness was ensured; The representative of the CPC mentioned that since, in fact, in a letter addressed to the Ministry of Justice on 20 July, 2022, the CPC proposed to postpone the above-mentioned action, no professional function was performed, and therefore the question of inclusiveness did not arise either. and the representative of the Ministry of Justice mentioned that a discussion with the participation of NGOs was organized in 2022, but found it difficult to mention the names of the latter.

According to the results of process (quantitative) evaluations, the action is evaluated as PARTIALLY IMPLEMENTED, BUT IMPLEMENTATION IS SUSPENDED.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because as a result of the suspension of the action, the role of the regulation impact assessment institute did not increase.

ACTION 16. Improving the system of declaration of property, incomes and interests. Introduction of a system of declaration of expenses

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Overcoming administrative corruption through the revealing of sectorial corruption risks and their	Ensuring continuous enforcement of adopted regulations.	MoJ, CPC, MHTI,	The Institute of declaration of expenses is introduced	Action is IMPLEMENTED . The strategic

reduction, through the continuous improvement of e-democracy tools. Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.		NGOs.		objective (outcome) IS PERFORMED
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the basis that as a result of the legislative changes made in 2021, the institute of declaration of expenses was introduced, and from 2022, the declarant officials are already declaring the expenses as well. Other details related to the implementation of the action are presented in the Final Report.

In response to the question submitted by the Monitoring Group, how was the performance of the action "Ensuring continuous implementation of adopted regulations" measured when preparing the report of the mentioned action, in case where no verifiable indicator of the latter is provided, and asking to provide the methodology of quantitative and qualitative assessment of results; the CPC replied that due to the amendments to the Law HO-51-N "On Public Service" adopted on 19 January, 2021, the electronic declaration system was unavailable for filling and submitting declarations from 06.07.2021.²² The electronic declaration system has been launched without interruption since 02.09.2021, ensuring not only the submission of annual, takeover and termination declarations in the new formats defined by the RA Government's decision N 858 of May 27, 2021, but also reporting and transparency. The electronic declaration system has been launched without interruption since 02.09.2021,²³ ensuring the annual submission of acceptance and termination of declarations in the new formats defined by the decision of the Government of the Republic of Armenia No. 858 of 27 May, 2021, as well as insuring there reporting and transparency.

The final report published by the Ministry of Justice of the Republic of Armenia refers to the implementation of discussions with the participation of officials only; therefore the Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, because the implementation and continuous enforcement of the declaration of expenses is both a mechanism of accountability, transparency and good behavior aimed at creating a decent and faithful image of a public servant as well as an electronic democracy tool for reducing corruption risks aimed at overcoming administrative corruption.

ACTION 17. Clarification of incompatibility requirements and conflict of interest situations of persons holding public positions and of public servants

²² Notice: official website of the Corruption Prevention Commission, 07.06.2021, available at the following link: <http://cpcarmenia.am/hy/news/item/2021/06/07/1/>

²³ Notice: official website of the Corruption Prevention Commission, 02.09.2021, available at the following link: <http://cpcarmenia.am/hy/news/item/2021/06/07/1/>

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Ensuring distinct limits of separation of business and politics	The legislative package aimed at clarifying the regulations regarding the incompatibility requirements and conflict of interest situations of persons holding public positions and public servants has been presented to the National Assembly.	CPC, Central Bank, SJC, RA Prosecutor General's Office, Investigative Committee, ACC.	The legislative package aimed at clarifying the regulations regarding the incompatibility requirements and conflict of interest situations of persons holding public positions and public servants has been presented to the National Assembly. According to the mentioned package incompatibility requirements of persons holding public positions and of public servants have been clarified, and which prescribes that in case of having participation (share, stock, unity) in the statutory capital of commercial organizations, persons holding public positions and public servants may transfer it to trust management exclusively to a specialized entity in the financial market. In addition, the conflict of interest regulations were revised.	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the basis that the Law HO-540-N on Amendments and Supplements to the Law "On Public Service" adopted on 7 December, 2022 clarified the requirements of the incompatibility for persons holding public positions and public servants: it is forbidden for a person holding a public position and a public servant to sign a trust management agreement for a share in the statutory capital of a commercial organization with an affiliated person; the exception under the Law on Securities Market was abolished, as a result of which the management of the share of a commercial organization can be carried out only by a licensed organization; and trust management activity of limited liability companies has become a notifiable activity, the registration of the management of the shares of limited liability companies has become mandatory and a clear period has been set, during which the official will be obliged to hand over the share acquired during the term of office to trust management. Other details related to the implementation of the activity are presented in the Final Report.

During the FGD discussion, participants expressed concern that the implemented regulations remain incomplete, for example, the regulation of the law according to which trust managers can be both organizations as well as individual entrepreneurs, which does not issue from the essence of the requirement to transfer the shareholding to PROFESSIONAL trust management companies.

In addition, in response to the question asked by the Monitoring Group during the FGD discussion, whether there is a regulatory legal act for the implementation of this law, in particular, a register and procedure for registering and recording contracts for the transfer of property by persons holding public positions and public servants to trust management, as a result of which it will be possible to qualitatively assess the impact of this activity and have the statistics on how many specialized companies provide the specified trust management service, and how many cases have been registered when officials entrusted their shares in a commercial organization to trust management, the representative of the MoJ stated that such order does not exist, and they do not have statistical data on the practice. Therefore, the **verifiable indicator set for this action are worrisome**, as they do not include the adoption of regulatory legal acts implementing the legislative changes, leaving reforms incomplete.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the clear boundaries of the separation of business and politics are not ensured due to the imperfection of the law and the lack of regulatory legal acts implementing the law and the incomplete verifiable indicator.

ACTION 18. Improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants; and establishment of monitoring tools for it

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	A package of draft legal acts aimed at improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants and defining the tools for control over the gift accounting process have been elaborated. The Draft has been submitted to the National Assembly. In parallel Terms of reference for the register of gifts has been elaborated.	MoJ, CPC, NGOs.	The Draft has been submitted to the National Assembly. In parallel, the work on the development of the electronic platform of the gift register has started.	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the basis that the Law HO-540-N on Amendments and Supplements to the Law "On Public Service" and related laws adopted on 7 December, 2022, regulate the issues for the

improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants and defining the tools for control over the gift accounting process. At the same time, it was mentioned that the works on the development of the electronic platform of the gift register have started, however, it was not specified exactly what works: for example, whether the terms of reference for the gift register have been developed. Other details related to the implementation of the action are presented in the Final Report.

According to the assessment of the Monitoring Group, **there is a discrepancy between the expected result defined by the action and its verifiable indicator** since the development of the terms of reference for the gift register is planned as an expected result, and as a verifiable indicator, the start of the development of the electronic platform of the gift register, and as a result of which the first is clearer and more measurable than the second one.

In response to the question of the Monitoring Group during the FGD regarding the stage of the development of the electronic platform of the gift register, the representative of the CPC stated that the procedure for managing the gift register and other regulatory legal acts should be developed by the end of 2023. According to the latter, it will be possible to announce a tender for launching the register this year, and the system will be operational by the end of 2024, and until then, some temporary solutions will be provided to implement the function related to gifts. As a result, although the package of draft legal acts aimed at improvement of the institute of gifts related to the exercise of official duties of persons holding public positions and of public servants and defining the tools for control over the gift accounting process has been adopted, yet, the Terms of reference for the register of gifts has not been developed as of 2022.

The final report published by the Ministry of Justice of the Republic of Armenia refers only to the implementation of public discussion through the unified website for the publication of legal acts' drafts; therefore, the Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, the measures carried out within the framework of this action aimed at creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity, that is, the toolkit of gifts related to the performance of official duties of public officials and public servants were not fully implemented.

ACTION 19. Ensuring the transparency of funding of political parties, considering the expediency for providing for legislative regulation of lobbying in the Republic of Armenia

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Simplifying and clarifying sectoral legal regulations.	Based on the recommendations, a package of draft legal acts defining mechanisms to ensure the transparency of political parties was developed and	MoJ, CEC, CPC, NA, NGOs.	The package of draft legal acts was submitted to the RA National Assembly. The transparency of party funding has	Action is PARTIALLY IMPLEMENTED . The strategic objective (outcome)

	submitted to the National Assembly of the Republic of Armenia. The issue of the expediency of legislative regulation of lobbying activities in the Republic of Armenia was discussed with the interested parties.		increased.	IS PERFORMED NOT COMPLETELY
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**, on the basis that, with the adoption of the law "On Amendments and Supplements to the Constitutional Law "On Parties" and related laws by the National Assembly on 4 May, 2022, the mechanisms aimed at the ensuring financial transparency of the parties were introduced, in particular, the proper implementation of the control over the financial activities of the parties by the Corruption Prevention Commission was ensured, but the issue of the regulation of lobbying activities is under discussion. Other details related to the implementation of the action are presented in the Final Report.

In response to the question of the Monitoring Group during the FGD, the CPC informed that according to the decision N 03-L of 31 October, 2022, due to the need to obtain additional data, information, and documents for the purpose of checking the annual reports of the parties subject to state funding, the period of checking the annual reports of the parties was extended by 60 days. During the examination of the annual reports of the parties, it was found that there are certain inconsistencies related to the applicability of the Constitutional Law:²⁴ lack of clarity of applied concepts, legislative gap in matters to be applied, as well as legal certainty issues, which have been raised by the CPC and presented to the interested parties.

According to the assessment of the Monitoring Group, **there is a discrepancy between the expected result defined by the action and its verifiable indicator**, in particular, as an expected result, it is planned to discuss the issue of the expediency of legislative regulation of the lobbying activities of the RA, but the latter does not have a clear verifiable indicator. Also, the indication the verifiable indicator "Transparency of party funding has increased", is **worrisome**, since the latter is not measurable.

The final report published by the Ministry of Internal Affairs of the Republic of Armenia refers to the implementation of discussion through the unified website for the publication of legal acts' drafts, as well as implementation of a public discussion with the participation of the CSO in 2023, therefore the Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**, because although the mechanisms aimed at the ensuring financial transparency of the parties were introduced, but as a result of shortcomings of the legislation, they do not increase the transparency of funding of the parties, in addition the issue of the expediency of legislative regulation of the lobbying activities of the RA has not been finally resolved.

²⁴ Issues raised as a result of the application of the Constitutional Law "On Parties" by the Corruption Prevention Commission in 2022. CPC.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the incomplete legislative changes did not contribute to the simplifying and clarifying sectoral legal regulations.

ACTION 20. Promoting the adoption of anti-corruption compliance requirements in the business sector

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Ensuring and guaranteeing freedom of economic activities and free economic competition.	The presence of anti-corruption compliance has been defined by relevant legal acts as an advantage criterion in providing state support to representatives of the business sector. The anti-corruption compliance requirements in the business sector have been established by relevant legal acts.	Ministry of Economy of the Republic of Armenia, "Corporate Governance Center" Foundation, MoJ, NGOs	The presence of anti-corruption compliance with at least 1 state support program for the business sector has been defined by relevant legal acts as an advantage criterion. At least 10 companies have introduced anti-corruption compliance requirements.	Action is PARTIALLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**, on the grounds that anti-corruption compliance mechanisms have been implemented in around 22 companies participating in the Business Integrity Club. However, although the draft of the legal act aimed at defining the criterion giving an advantage to the presence of anti-corruption compliance with the state support program has been developed, it is still in the stage of internal discussions. Other details related to the implementation of the action are presented in the Final Report.

According to the assessment of the Monitoring Group, the expected result of the activity and the Verifiable indicator are not sufficiently ambitious, in particular, from the analysis of international practice, it becomes clear that the most effective model for promoting the adoption of anti-corruption compliance requirements is the model, according to which the existence of anti-corruption compliance programs is defined as a legal requirement that excludes the criminal liability of a legal entity or provides a mitigating circumstance (e.g. Netherlands, Spain, Austria), rather than the model provided for in the framework of this strategy as a criterion that gives priority to the provision of state support to representatives of the business sector.

The Civil Society was included in the process mainly through the "Corporate Governance Center" Foundation, participating within the framework of the program implemented by the latter with donor funding.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the provision of anti-corruption compliance mechanisms in

22 companies without the definition of incentive norms by relevant legal acts cannot ensure and guarantee freedom of economic activities and free economic competition.

ACTION 21. Improvement of the field of procurement

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Ensuring distinct limits of separation of business and politics, ensuring and guaranteeing freedom of economic activities and free economic competition.	Based on the study, a package of drafts aimed at the simplification of the processes of procurement, ensuring the certainty of the procurement, in the case of carrying out purchases in the national regime at the expense of programs implemented with external support, to create the possibility of managing the processes with unified rules has been elaborated and adopted.	Ministry of Finance of the RA	The package of drafts aimed at improving the procurement system has been presented to the National Assembly. The procurement system has been improved.	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the basis that the package of legislative acts aimed at improving the procurement system was adopted, and accordingly the procurement system was improved. In particular, the report refers to the package of legislative amendments related to extrajudicial appeals system of procurement appeal system adopted on 21 January, 2022, by which it was also established that the RA Government approves the specifics of the procurement processes organized at the expense of financial resources provided for by international agreements. Other details related to the implementation of the action are presented in the Final Report.

As a result of the desk review carried out by the Monitoring Group, it became clear that there is no RA Government decision on the above issue. In addition, according to the assessment of the Monitoring Group, the verifiable indicator "Procurement system has been improved" is of concern because it is not sufficiently clear and measurable. Moreover, as a result of the FGDs, various concerns were raised by the participants regarding the simplicity and certainty of the procurement process, by which it becomes clear that the adopted legislative package could not comprehensively solve the problem before it. And as a result of which the evaluation of the action as "implemented" is called into question from the prism of the verifiable indicator of the improvement of the procurement system.

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the latter did not ensure distinct limits of separation of

business and politics, and ensuring and guaranteeing freedom of economic activities and free economic competition.

ACTION 22. Introduction of the institute of beneficial owners of legal entities

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Ensuring distinct limits of separation of business and politics, ensuring and guaranteeing freedom of economic activities and free economic competition.	The electronic platform of the register of beneficial owners of legal entities is launched and operational.	MoJ, Bodies of the state administration system, NGOs.	200 declarations of beneficial owners were submitted by legal entities in 2022,	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the basis that the requirement to declare beneficial owners has been extended to all legal persons since January 2023. At the same time, the electronic platform of the register of beneficial owners of legal persons was launched. As of 10 March, 2023, about 37,000 declarations were submitted through the electronic platform of the register of beneficial owners of legal persons. Other details related to the implementation of the action are presented in the Final Report.

Since the verifiable indicator refers to 2022, and according to the statistical information provided by the State Register of Legal Entities, a total of 1,850 declarations were submitted in 2022, which exceeds the threshold of 200 declarations provided by the verifiable indicator.

The final report published by the Ministry of Justice of the Republic of Armenia refers only to the implementation of public awareness campaigns; therefore, the Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, because the submission of about 1,000 declarations regarding the beneficial owners is a factor contributing to ensuring distinct limits of separation of business and politics, ensuring and guaranteeing freedom of economic activities and free economic competition.

ACTION 23. Improvement of legislation on the field of protection of economic competition

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Insuring and guaranteeing freedom of economic activities and free economic competition.	Regulatory legal acts to ensure the implementation of legislative changes have been adopted.	Competition Protection Commission MoJ.	Regulatory legal acts ensuring the implementation of legislative changes have been fully adopted (2022).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, 18 regulatory legal acts that ensure the implementation of legislative changes, including: the procedure for the operation of the Competition Protection Commission, the procedure for determining unreasonably high and unreasonably low prices, the procedure for assessing state support, the method for choosing a measure of liability and calculating a fine, the procedure for submitting a report subject to encryption, and the procedure for its encryption, the procedure for determining the degree of similarity of means of personalization of goods and services, and a number of other acts that ensure the activities of the Commission, were adopted in full in the reporting period. Other details related to the implementation of the action are presented in the Final Report.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **PERFORMED**, because the adoption of 18 sub-legislative normative legal acts ensuring the enforcement of legislation on the protection of economic competition is a factor contributing to ensuring distinct limits of separation of business and politics, ensuring and guaranteeing freedom of economic activities and free economic competition.

ACTION 24. Increasing the effectiveness of ensuring public participation in the process of elaborating draft legal acts

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens	New statistical tools are introduced that ensure the open and transparent process of drafting and adopting legal acts. Public awareness-raising measures on the www.e-draft.am platform, as well as the rules on availing the reform are being implemented.	MoJ. MHTI, HRD, NGOs.	At least 2 public awareness-raising measures have been implemented (2022). The visibility of legal acts posted on the www.e-draft.am platform increased by 10% (2022).	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the grounds that the following public awareness events were carried out: a working round-table discussion on the topic "Advantages and Problems of the e-draft.am Online Platform" and the publication of informative material and a video clip on various platforms, as a result of which, in 2022, the visibility of legal acts posted on the www.e-draft.am platform, the number of visits increased by 144.3% compared to 2019.

According to the assessment of the Monitoring Group, **there is a discrepancy between the expected result defined by the action and the latter's indicator**, in particular, the introduction of new statistical tools is planned as an expected result, in particular, as an expected result, the introduction of new statistical tools is planned, in connection with which no verifiable indicator is provided. In this regard, the final report published by the Ministry of Justice of the Republic of Armenia refers to the updated terms of reference for the modernization of the www.e-draft.am platform as a result of the above discussion, which was presented to the Staff of the Prime Minister for discussion at the session of the Digitalization

Council and to support the financing of the project. However, the latter has not been modernized until now, as a result of which new statistical tools have not been introduced.

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the latter did not contribute to completely instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens.

ACTION 25. Introduction of a toolkit for receiving accessible information on the services being provided by state and local self-government bodies to citizens the most

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens	Actions for the introduction of a toolkit for obtaining accessible information on the services being provided have been implemented.	Bodies of state administration system, e-Governance infrastructure implementation agency (EKENG).	Sample forms of filling in applications on the services being provided have been elaborated and published on the websites of at least 3 state bodies (2021թ).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, on the grounds that a number of state bodies have developed and posted on their official websites the sample forms of applications necessary for receiving services.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, because the latter contributed to instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens.

ACTION 26. Continuous improvement of the system of whistleblowing and improvement of the legislative mechanisms for the protection of whistleblowers

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	Recommendations for the effectiveness of the whistleblowing system based on the conducted studies are presented to the Prime Minister's Office. Based on the recommendations, a package of draft legal	MoJ, Prosecutor General's Office.	The statistics of cases of whistle-blowing are included in the annual report of the Ministry of Justice of the Republic of Armenia and on the unified electronic platform of whistleblowing. (2020, 2021, 2022).	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

<p>Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.</p>	<p>acts aimed at improving the whistleblowing system and the mechanisms for the whistleblowers protection was developed and presented to the Staff of the Prime Minister. Prescribing a unified mechanism for maintaining statistics of internal and external whistle-blowing. The package of drafts aimed at improving the whistleblowing system and whistleblower protection mechanisms is presented to the National Assembly.</p>		<p>The package established based on the recommendations has been submitted to the Staff to the Prime Minister of the Republic of Armenia. The system of whistleblowing has been improved (2022). Legislative mechanisms for the protection of whistleblowers have been improved in line with international experience (2022). Regulations for establishing mechanisms for whistle-blowing related the declarations, conflicts of interest and incompatibility offenses, providing access to the system of whistle-blowing to the Corruption Prevention Commission have been established (2022).</p>	
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, as a result of legislative changes; the legal mechanisms for the protection of whistleblowers have been improved in line with international experience, the whistleblowing mechanisms related to the declarations, conflicts of interest and incompatibility offenses have been established. The requirements for conducting statistics have also been defined. In addition, the statistics of whistleblowing cases are published on the unified electronic platform of whistle-blowing.

According to the results of the monitoring, the current arrangements for internal and external whistleblowing are ineffective unless they are carried out anonymously and electronically. During the reporting period, the statistics were not fully presented on the unified electronic reporting platform; the statistics of reporting cases is not included in the annual report of the MoJ.

The Civil Society was not included in the process through separate measures; only the draft was published on the Unified Website for Publication of Legal Acts' Drafts.²⁵

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because within the framework of this activity creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity was not implemented completely, and also the performed

²⁵ The draft legal act was submitted for public discussion at the following link: <https://www.e-draft.am/projects/4470>

works did not contribute to guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences.

Process (quantitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	19	100%
OF WHICH IMPLEMENTED	5	26.32%
OF WHICH MOSTLY IMPLEMENTED	5	26.32%
OF WHICH PARTIALLY IMPLEMENTED BUT IMPLEMENTATION IS SUSPENDED	1	5.26%
OF WHICH PARTIALLY IMPLEMENTED	6	31.58%
OF WHICH NOT IMPLEMENTED	2	10.53%

Impact level (qualitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	19	100%
OF WHICH PERFORMED	5	26.32%
OF WHICH PERFORMED NOT COMPLETELY	13	68.42%
OF WHICH NOT PERFORMED	1	5.26%

SECTOR 3. INVESTIGATION OF CORRUPTION-RELATED CASES

ACTION 27. Clarification of the scope of corruption-related crimes under the Criminal Code of the Republic of Armenia

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	No result has been set for 2022.	Moj, Prosecutor General's Office, ACC National Security Service, RA Police, SRC.	The benchmark determination of the scope of corruption-related crimes has been ensured according to the recommendations of the experts of the OECD Anti-Corruption Network, the Council of Europe and the European Union (2019).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, since the Chapter “Crimes Against the Interests of Public Service” of the new Criminal Code, which entered into force on 1 July, 2022, has been supplemented with the corpus delicti of receiving a bribe, solicitation of bribery, or using real or supposed influence out of mercenary or personal motives or group interests proposing to give or accepting an offer or promise to give a property, including financial means, security, service, other payment instrument, property right, and forced disappearance; corpus delicti of exceeding of official powers was combined with corpus delicti of abuse of official powers; the concept of “an official” provided for in Article 3 of the Code has been expanded.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, within the framework of this action, the work carried out contributed to the improvement of legislation, including through the statutory definition of the list of corruption crimes.

ACTION 28. Studying the compliance of the elements of corruption-related crimes enshrined by the Criminal Code of the Republic of Armenia with international standards, establishing regulations on bringing the corruption-related crimes in line with international standards under the new Criminal Code

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
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<p>Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.</p>	<p>Recommendation on the necessity for bringing the elements, as well as the statute of limitation of corruption-related crimes in line with international standards were included in the framework of the draft of the new Criminal Code of the Republic of Armenia.</p>	<p>MoJ, Prosecutor General's Office, CPC, Investigative Committee, National Security Service RA Police, SRC.</p>	<p>The study of international practice is conducted (2010). According to the results, the recommendations are included in the draft Criminal Code of the Republic of Armenia (2021)</p>	<p>Action is PARTIALLY IMPLEMENTED. The strategic objective (outcome) IS PERFORMED NOT COMPLETELY</p>
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, since the elements, as well as the statute of limitation of corruption-related crimes were included in the framework of the draft of the new Criminal Code of the Republic of Armenia.

The Monitoring Group submitted questions to the MoJ regarding the study of international experience, including the provision of special regulations regarding statutes of limitations for corruption crimes. No complete answer to the aforementioned was provided, the results of the study of international experience were not presented, and therefore the impact of the action in this regard cannot be fully assessed due to the lack of complete information.

At the same time, in terms of statute of limitations, the interested bodies reported that a new mechanism for calculating statute of limitation was established by the New Criminal Code. (...) if under the conditions of the previous Criminal Code, due to the delay of court hearings and other circumstances, within the framework of the investigation of corruption crimes, it was possible to achieve that a person could be released from responsibility on the basis of the expiration of the statute of limitations, then, according to the new Criminal Code, the person is deprived of such an opportunity. Therefore, this legislative regulation created an additional guarantee so that the perpetrators of corruption crimes could not evade responsibility.

At the same time, it appeared that new, stricter legal regulations for the suspension of the statute of limitation were established by the current Criminal Code of the Republic of Armenia. At the same time, the current Criminal Code of the Republic of Armenia has established new, stricter legal regulations for the suspension of the statute of limitations. In addition, it was noted that the new RA Criminal Code generally does not apply statute of limitation for the crime of **"abuse of official authority or official position or the influence caused by them or excess of powers, committed with the use of violence"** (Article 441, Part 2, Clause 1 of the RA Criminal Code).

In connection with the mentioned, it is necessary to record two facts: first, the change in statutes of limitations in the new Criminal Code of the Republic of Armenia is universal in nature, that is, the change in the initial circumstances for calculating the statute of limitation for criminal liability applies to all crimes of the RA Criminal Code. In other words, this amendment was extended to commission of both corruption and non-corruption crimes. Therefore, it should be stated that the change in the calculation of the statute of limitation was not made just taking into account the corrupt nature of some crimes. With regard to the fact that the statute of limitation for criminal liability is not provided for the crime of **abuse of official authority or official position or the influence caused by them or excess of powers**,

committed with the use of violence, it should be noted that this regulation also has nothing to do with the corrupt nature. In particular, the basis for not applying the statute of limitations not the entire crime of Article 441, Part 2, Clause 1 of the RA Criminal Code, but only the qualified type of crime of abusing authority or excess of powers authority, **through manifestation by violence**. This is due to international standards, which require excluding the application of the statute of limitation for criminal liability in the case of torture or actions equivalent to it. Therefore, the mentioned change has nothing to do with its corrupt nature. Therefore, the justifications presented by the interested bodies in this regard cannot be accepted.

In such circumstances, it should be noted that the new Criminal Code of the Republic of Armenia does not provide special regulations for calculating the statute of limitation for corruption crimes due to their corrupt nature.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because within the framework of this action, the mentioned change in terms of improving the legislation does not correspond to the defined strategic issue.

ACTION 29. Developing a methodology for investigation of individual corruption crimes, including illicit enrichment, training of criminal prosecution bodies on the basis of the developed methodology

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	The methodology for investigation of individual corruption-related crimes, including illicit enrichment, has been improved, at the same time providing regulations on the use of specific mechanisms, methodological instructions developing analytical abilities. Trainings are held regular.	Prosecutor General's Office, and HRD, NSS, Academy of Justice, NGOs.	At least 4 trainings have been conducted (2021-2022).	Action is MOSTLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, back in 2021, the methodological guide for the investigation of individual corruption crimes, including illicit enrichment, was developed and approved by the order No. 35 of the Prosecutor General dated 22 March, 2021. In addition, 7 investigators of the Special Investigation Service and 58 investigators of the Investigative Committee underwent training in 2021 on the following topics: "Forensic tactics and methodology", and "Methodology of investigation of corruption crimes". In 2021, trainings were held on the following topics: "Current Issues of Combating Corruption in Public Service", "Investigation of Corruption Cases", "Forensic Tactics and Methodology", "Investigation of Corruption Cases", "Investigation of Official Corruption Cases", "Financial Crimes of Corrupt Nature and Fight against Transnational Organized Crime".

The Monitoring Group submitted questions to the MoJ regarding the methods used to select the training participants for training on the methodology of investigation of individual crimes, including illicit enrichment. What positions did the latter hold, how many of them are from Yerevan, how many from RA marzes? Was there a pre- and post-test of their knowledge (information) in the target areas? If so, what were the results of the improvement in terms of percentage? Who conducted the trainings and by what methodology were they selected, was their evaluation done by the participants? If so, what kind of assessment system (tool) has worked and, in general, what rating was given to the trainer? What methodology was used to develop the training materials and who are their authors? By what method were the authors selected, asking for training materials, a list of trainers and/or their online links? No answer was provided to the aforementioned; therefore, the impact of the action in this regard cannot be fully assessed due to the lack of complete information.

At the same time, it is worth noting that within the framework of the FGDs conducted by the Monitoring Group, it became clear that the mentioned information is not complete; no separate standard was set, whether the participants were from the regions or from Yerevan; there was no assessment of the knowledge of the trained persons; there is no special toolkit in terms of training methodology; there was no special methodology provided for the selection of trainers. In such conditions, it is not possible to consider the strategic objective of the action completely performed by the results of the impact level, because the baseline data necessary for the actual assessment are missing.

In connection with the mentioned, the interested bodies informed the monitoring group that the mandatory training is not related to the fact whether the person occupying the relevant position holds office in Marz or in Yerevan. It was also noted that the training methodology included lectures, seminars, practical lessons, as well as the use of other educational methods that encourage self-education of the students. At the same time, it reported that the criteria for engaging as a lecturer are: the presence of a scientific degree, the presence of at least three years of professional work or scientific-pedagogical experience, at least two years of experience in the field related to the course being taught, Participation in courses for training of trainers (ToT) organized by the Academy of Justice or partner structures. Referring to the evaluation of the persons involved as lecturers, it was noted that after the end of the training, all students are given the opportunity to fill out an anonymous evaluation questionnaire, the summarized results of which are taken into account by the Academy during the organization of the further educational process.

In such conditions, although according to the presented data, the action was carried out quantitatively, but the strategic task (result) was not completely implemented in terms of impact level (qualitative) results, because the baseline data do not allow evaluating its effectiveness.

According to the results of process (quantitative) evaluations, the action is evaluated as **MOSTLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, because the trainings conducted within the framework of this action cannot be assessed as having served their objective, as they were not complete in order to ensure the principle of inevitability of liability in practice.

ACTION 30. Complementing the statistics on corruption-related crimes

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the	The procedures for	Prosecutor General's	The statistics on corruption-	Action is

implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	maintaining statistics on the sources of information concerning corruption-related crimes and on the property confiscated and levied in execution as a result of investigation thereof are approved. The statistics on corruption-related crimes have been complemented with data on the sources of information concerning corruption-related crimes and on the property confiscated and levied in execution as a result of investigation thereof.	Office, RA Police.	related crimes have been complemented with data on the sources of information concerning corruption-related crimes and on the property confiscated and levied in execution as a result of investigation thereof (2021).	IMPLEMENTED. The strategic objective (outcome) IS PERFORMED
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, because already in 2019, the statistics on corruption-related crimes approved by the relevant orders of the Prosecutor General of the Republic of Armenia dated 27 December, 2019 and 2 July, 2020, have been complemented with data on the sources of information concerning corruption-related crimes and on the property confiscated and levied in execution as a result of investigation thereof. In addition, the Prosecutor General's Office publishes every year a report on the investigation of corruption crimes on annual basis, which in addition to statistical data presents the analyzes of this data and compares it with the data of the previous year.²⁶

According to the monitoring results, the procedure for the maintenance of statistical data regarding corruption crimes was approved by the legislation; the information about the investigation of corruption crimes is being published.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, because within the framework of the continuous improvement of the legislation, the procedures for conducting statistics were approved.

ACTION 31. Ensuring the access of criminal prosecution bodies to the electronic databases of state bodies through electronic enquiry

Final or intermediate results: at the level of the strategic	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
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²⁶ The mentioned annual references are available at the following link: <https://n9.cl/wpagk>

objective				
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	Obstacles to ensuring complete electronic access to the electronic databases of state bodies by the criminal prosecution bodies and making electronic inquiries have been revealed, problems have been identified and recommendations aimed at solving those problems have been presented. Implementation of necessary actions aimed at solving the problems. The law enforcement bodies have access to the information databases of state bodies through electronic requests, which are necessary for the effective investigation of corruption and other economic crimes.	Staff to the Deputy Prime Minister. Office for the Introduction of Electronic Governance Infrastructures (EKENG), MoJ, MHTI, Prosecutor General's Office, NSS, Investigative Committee, ACC.	The software for the access by law enforcement bodies, through electronic enquiries, to information databases of state bodies is introduced and is being completely operated (2022). At least 5 enquiries have been conducted (2022).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, access to the databases was provided in accordance with the procedure established by the RA Government Decision N 1849 of 19 December 2019. About fifty web services can be used to retrieve data from various government databases. At the same time, the inquiries made through the CCA in 2022 amounted to around 170 million.

According to the results of the monitoring, the criminal prosecution bodies through "EKENG" CJSC have access to the databases of other state bodies, such as the data of the Passport and Visa Department of the Police, the State Register, the Electronic Register of the Road Police and other databases.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, since, as part of the constant improvement of legislation, the criminal prosecution bodies have gained access to the necessary basic databases for investigating corruption offences.

ACTION 32. Establishing a centralized register of bank accounts

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	The package of draft legal acts was submitted to the National Assembly. The settings of the centralized register of bank accounts have been adopted. The centralized register of bank accounts is operational and the data is filled in.	CB, MHTI.	The international practice on centralized register of bank accounts was studied; and a package of recommendations has been submitted to the Staff to the Prime Minister of the Republic of	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED

			Armenia. (2019).	
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According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, since from 2022 the centralized register of bank accounts has been established, is operational and the data has been fully filled in.

According to the results of the monitoring, the register was developed by the Central Bank of the RA within the framework of cooperation with the RA SRC for the implementation of public benefit objectives.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **PERFORMED**, since, as result of legislative improvements the centralized register of bank accounts has been created.

ACTION 33. Strengthening international cooperation in investigating and disclosing corruption-related crimes

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	The Draft Law On Legal Assistance in Criminal Cases providing recommendations on overcoming existing obstacles to the implementation of international cooperation in corruption cases was submitted to the National Assembly.	MoJ, Prosecutor General's Office, NSS.	The Law "On Legal Assistance in Criminal Cases" was adopted and the mechanisms of international cooperation in the framework of investigation and detection of corruption crimes were improved. (2022).	Action is NOT IMPLEMENTED . The strategic objective (outcome) IS NOT PERFORMED

According to the final report published by the Ministry of Justice of RA, the action was assessed as **not implemented**, because the Law "On Legal Assistance in Criminal Cases" was not adopted and the mechanisms of international cooperation in the framework of investigation and detection of corruption crimes were not improved.

According to the monitoring results, the law has not been adopted and currently, in this respect, the relevant provisions of the old RA Criminal Procedure Code are actually applied, which to some extent are in conflict with a number of institutions and structures provided by the New RA Criminal Procedure Code.

In connection with the mentioned, the interested bodies informed that the title of the "Draft Law On Legal Assistance in Criminal Cases" was changed and was defined as the RA Draft Law "On Legal Assistance in Criminal Proceedings". It is currently in the stage of public discussions and according to the Government Programme 2021-2026, it is envisaged to circulate and adopt of the RA Draft Law "On Legal Assistance in Criminal Proceedings". by the first ten days of December 2023.

According to the results of process (quantitative) evaluations, the action is evaluated as **NOT IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation **is NOT PERFORMED**.

ACTION 34. Establishing mechanisms aimed at confiscation of property of illicit origin

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Establishing and introduction of mechanisms aimed at confiscation of property of illicit origin, ensuring their compliance with international standards, strengthening international cooperation.	Mechanisms aimed at confiscation of property of illicit origin, property management and international co-operation have been established and are being operated.	MoJ, Prosecutor General's Office, CB, NSS.	Mechanisms aimed at confiscation of property of illicit origin have been established (2021) and are operational (2022).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY

According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented**, since aimed to improve the existing mechanisms, the Draft Law "On Amendments and Additions to the Law on the Confiscation of Property of Illicit Origin" was developed by the Prosecutor General's Office and presented to the interested bodies by the MoJ for opinion and public discussion. The mentioned law (HO-270-N) was adopted on 9 June, 2022 and entered into force on 10 July, 2022. The law specified a number of existing regulations.

According to the monitoring results, it should be noted that after the law came into force, the opinion of the Venice Commission on 19 December, 2022, based on the application of the RA CC, made it clear that the law needs to be amended, in particular, in some issues, such as the legislative regulations regarding the burden of proof, need to be clarified.²⁷ In other words, the key circumstances of the confiscation of property of illicit origin need to be clarified by law.

In such conditions, although according to the results of the procedural evaluations the action was carried out, yet the strategic task (result) according to the impact level (qualitative) results was not fully implemented, since the legal regulations are not complete and do not provide a certain understanding of the key circumstances of confiscation of property of illicit origin.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, since the mechanisms aimed at confiscation of property of illicit origin and their introduction in compliance with international standards have not been fully performed.

ACTION 35. Introduction of an institute to subject legal persons to criminal liability for corruption-related offences under the Draft of the New Criminal Code

Final or intermediate results: at the level of the	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
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²⁷ The position of the Venice Commission is available at the following link:
[https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2022\)048-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2022)048-e), paragraph 61.:

strategic objective				
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	The Draft of the New Criminal Code and the package of related drafts were developed and submitted to the National Assembly.	MoJ, Prosecutor General's Office.	The Draft of the New Criminal Code and the package of related drafts have been submitted to the National Assembly. (2021)	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, because with the adoption of the new RA Criminal Code, the institute of criminal liability of legal persons (including for corruption crimes) was introduced. The provisions related to the liability of legal persons entered into force on 1 January, 2023.

The Monitoring Group submitted questions to the MoJ on whether there is a study of international experience on the institution of criminal liability of legal persons; whether there is statistical data on the institution of criminal liability of legal persons, whether before the introduction of the institute, it was discussed with the business sector; was the potential impact of this institute on the business environment assessed before the institute was introduced? No answer was provided to the aforementioned; therefore, the impact of the action in this regard cannot be fully assessed due to the lack of complete information.

At the same time, the Monitoring Group has studied that the RA legislation regarding criminal prosecution of legal persons includes wide discretionary possibilities for criminal prosecution bodies, which in practice can give rise to arbitrariness. For example, Part 1 of Article 124 of the Criminal Code of the Republic of Armenia stipulates that “A legal entity is not subject to criminal liability, if participants or shareholders of a legal entity have taken all reasonably necessary steps to prevent the commission of criminal offence by persons specified in Part 1 of Article 123 of this Code, however there was no real possibility to prevent the crime. In this context, the regulation does not comply with the principle of certainty and does not create an opportunity for legal entities to clarify the content of the legislative regulation.” In this context, the regulation does not comply with the principle of certainty and does not create an opportunity for legal entities to clarify the content of the legislative regulation.

In such conditions, the institute of criminal responsibility of legal persons needs to be equipped with the necessary guarantees so that, on the one hand, the institute of criminal responsibility of legal persons, provided for in the Criminal Code, serves its purpose and on the other hand, to ensure the necessary conditions to guarantee the normal course of activity of legal entities, and in general, to ensure the principle of fair responsibility. For this reason, it is necessary to ensure the full harmony of the criminal law and criminal procedure regulations, to clarify the scope of the articles subject to the criminalization of legal entities; defining the features of being criminally liable in cases of reorganization and bankruptcy of legal entities; the narrowing of the wide range of discretion in regulations excluding legal entities from criminal liability; revision of the regulations mechanically exempting legal entities from criminal liability, with the provision of certain valid conditions in accordance with legal certainty; providing for the possibility of applying security measures to legal entities; provision of the possibility of suspension (conditional non-application) of legal intervention measures applied to legal entities; clarification of the scope of grounds for exempting legal entities from criminal liability; clarifying the possibility of criminal liability of state non-commercial organizations, and companies with state shares; as well as defining the basis for non-criminal liability of international organizations.

Taking into account the above said, it is necessary to record that although the action has been carried out quantitatively and the institute of bringing legal entities to criminal responsibility has been introduced, the strategic task of the action has not been completely performed in terms of impact level (qualitative) results.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **PERFORMED NOT COMPLETELY**, since the legislation has not been fully improved.

ACTION 36. Creating pre-conditions for bringing the legal regulations prescribed by Article 30 of the Law "On Operational Intelligence Activity" in compliance with the law enforcement practice

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Guaranteeing the implementation of the principle of inevitability of liability for corruption-related offences, ongoing improvement of the legislation, including through establishing the list of corruption-related crimes.	A legislative package, which will bring the operative investigative measure of imitation of receiving or giving a bribe into the scope of corruption crimes provided for by the new Criminal Code has been developed and presented to the National Assembly.	MoJ, Prosecutor General's Office, Investigative Committee, NSS, RA Police.	The package of legislative amendments eliminating the contradiction between the legal regulations prescribed by the new Law of the Republic of Armenia "On Operational Intelligence Activity" and the law enforcement practice has been submitted to the National Assembly (2022թ).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, because according to the Law HO-154-N of 09 June, 2022 "On Making Amendments and Supplements to the Law "On Operational Intelligence Activities", corresponding changes were made to the Law "On Operational Intelligence Activities" and thus contradiction between the new Criminal Code and the application of law in practice were resolved.

According to the monitoring results, the law has been adopted and is properly applied in practice.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action is **PERFORMED**, since, the legislation has been improved in terms of the existing problem in legal practice.

Process (quantitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	10	100%
OF WHICH IMPLEMENTED	7	70%
OF WHICH MOSTLY IMPLEMENTED	1	10%

OF WHICH PARTIALLY IMPLEMENTED	1	10%
OF WHICH NOT IMPLEMENTED	1	10%

Impact level (qualitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	10	100%
OF WHICH PERFORMED	5	50%
OF WHICH PERFORMED NOT COMPLETELY	4	40%
OF WHICH NOT PERFORMED	1	10%

SECTOR 4. PUBLIC AWARENESS AND ANTI-CORRUPTION EDUCATION

ACTION 37. Elaboration, approval and implementation of a programme of an annual public awareness campaign

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens by way of changing the attitude towards the institution of whistle-blowing.	The Communication Action Plan has been approved and is being implemented.	MoJ, Staff of the Prime Minister, CPC, Bodies of the state administration system, NGOs, Mass Media.	The Communication Action Plan has been approved and At least 5 measures have been implemented (2021-2022).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented** and the Communication Action Plan²⁸ was approved by the decision N 820-L of the Prime Minister dated 18 July, 2022. Other details related to the implementation of the action are presented in the Final Report.

Within the framework of the mentioned program, awareness campaigns about the implementation of anti-corruption strategy actions and the resulting reforms were carried out through the broadcasting/showing of advertising videos on television, social networks and official websites, and the publication of informational materials on social networks, official websites and mass media. In addition, within the framework of the information campaign on the activities of anti-corruption bodies, informative videos were broadcast (shown), informational materials were published on social networks and official websites, and, if possible, in the mass media. Other details related to the implementation of the action are presented in the Final Report. According to the monitoring results, no baseline research was carried out when developing the Communication Action Plan and planning the actions, no other baseline data was available either. Actions were not measured when developing the Communication Action Plan implementation report.²⁹ Evaluation of the impact of implementation of the Communication Action Plan on the anti-corruption perception and awareness of the public was not carried out as well. It can be assumed that the plan is outdated and refers only to the last six months.

Regarding the organization of at least 5 events, according to the CPC, awareness meetings, which were attended by about 330 participants, were held. At these meetings, no preliminary and final (post) testing (evaluation) of knowledge (information) were carried out; evaluation of the impact assessment of the meetings, and evaluation of trainers was not carried out as well. The speakers were the employees of the professional departments of the CPC, who participated in trainings for trainers within the framework of the EU Twinning Project.

As part of the Communication Action Plan, the CPC has made publications on the Facebook domain, for which no statistics of views or a digital image have been published; no impact assessment was carried

²⁸ See the Communication Action Plan at: <https://www.arlis.am/DocumentView.aspx?DocID=166032>

²⁹ See the implementation report the Communication Action Plan at: <https://moj.am/storage/uploads/REPORT%20ON%20COMMUNICATION%20ACTION%20PLAN.pdf>

out. The plan for the awareness campaigns envisaged by Actions 1 and 2 of the Communication Action Plan has not been developed.

Civil society and mass media were not included in this process in separate actions; the draft was published on the Unified Website for Publication of Legal Acts' Drafts for public discussion.³⁰

In such conditions, although according to the presented data, the action has been carried out quantitatively, however the strategic task (result) has not been fully performed according to the impact level (qualitative) results, because the baseline data does not allow to evaluate its effectiveness.

According to the results of process (quantitative) evaluations, the action is evaluated as IMPLEMENTED.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, since the works carried out within the framework of this action did not contribute to the complete instilling of an attitude of denial towards corruption through public awareness-raising.

ACTION 38. Including the non-mandatory course of the subject “Fundamentals of the Anti-Corruption Policy” in the teaching modules of all higher education and secondary vocational education institutions

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens by way of changing the attitude towards the institution of whistle-blowing.	The subject standards have been defined. The course or subject “Fundamentals of the Anti-Corruption Policy” is being taught in higher education and secondary vocational education institutions. Educational materials on anti-corruption topics have been created for students higher education and secondary vocational education institutions	MESCS, Higher education institutions, Secondary vocational education institutions.	Educational materials on anti-corruption topics were shown at least 2 times for students in Higher education and Secondary vocational education institutions. (2022).	Action is PARTIALLY IMPLEMENTED. The strategic objective (outcome) IS PERFORMED NOT COMPLETELY.

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**, 428 anti-corruption topic programs and are being implemented for the 2nd-4th year students of the Secondary vocational education institutions (about 8430 students). 244 anti-corruption thematic topic programs have been developed and are being implemented in the 1st-3rd years of Primary (Craftsmanship) Education institutions (about 3396 students). The subject “Fundamentals of the Anti-Corruption Policy” is taught in universities since the 2021-2022 academic year, within the framework of social science subjects. This subject (thematic program) is also included in the educational programs of the Primary (Craftsmanship) and Secondary Vocational Education institutions and the higher and secondary professional educational programs of the Educational Complex

³⁰ The draft legal act was submitted for public discussion at: <https://www.e-draft.am/projects/3879>

of Police of the RA. Other details related to the implementation of the action are presented in the Final Report.

According to the results of the monitoring, there is no mechanism for evaluating the impact of the "Fundamentals of Anti-Corruption Policy" training, which would make it possible to clearly assess the final result of the action for the graduate of the course or subject program. Regarding this activity, the set audit indicators are of concern, which are more situational than systemic. For example, one of the indicators is the showing of two courses, but it is not clear what result this can give. **The issue of cooperation was also raised:** Meetings with higher education institutions were not initiated by the Ministry of Education and Culture, but an official correspondence was conducted, through which the sectoral body suggested to the higher education institutions to introduce anti-corruption courses in the form of a module or class.

The Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED.**

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY,** since the works carried out within the framework of this action did not contribute to the complete instilling of an attitude of denial towards corruption through public awareness-raising.

ACTION 39. Providing anti-corruption education in high school

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Instilling an attitude of denial towards corruption through public education and awareness-raising, including shaping demanding citizens by way of changing the attitude towards the institution of whistle-blowing.	The subject standards have been defined. The content of the sections related to corruption in the textbooks of the subject "Social Science" has been changed. Educational materials on anti-corruption topics have been created for high school students.	MESCS, Higher education institutions.	Educational materials on anti-corruption topics were shown to high school students of at least 40 schools in Yerevan and at least 5 schools in marzes. (2022).	Action is PARTIALLY IMPLEMENTED. The strategic objective (outcome) IS PERFORMED NOT COMPLETELY.

According to the final report published by the Ministry of Justice of RA, the action was assessed as **partially implemented.** The content of the sections related to corruption in the textbooks of the subject "Social Science" has been changed, teaching materials on anti-corruption topics were included in the textbooks of high school students, but the teaching of these materials was carried out only in public educational institutions of Tavush Marz. According to the CPC, during 2022, information/awareness meetings on "Anti-Corruption Policy and Integrity" were held among the teachers and parents of school-aged children in the schools of Yerevan and marzes. Other details related to the implementation of the actions are presented in the Final Report.

According to the monitoring results, instead of 40 schools, educational materials were implemented only in grades 9, 10 and 11 of 25 schools in Tavush Marz. No preliminary (pre) and final (post) test of knowledge was performed. An impact assessment of the evaluation has also not been carried out, as the

results will be summarized in May 2023. The issue of cooperation between the Ministry of Justice and the Ministry of Education, Science, Culture and Sports was also raised, as verifiable indicators were not discussed as such, but were provided for in the Strategy.

The Civil Society was not included in this process.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, since the works carried out within the framework of this action did not contribute to the complete instilling of an attitude of denial towards corruption through public awareness-raising.

ACTION 40. Public awareness-raising on the reforms being implemented in the civil service system, conducting trainings, including on prevention of corruption and integrity

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	Regular trainings, seminars, events aimed at awareness-raising have been conducted.	Bureau of Civil Service of the Staff to the Prime Minister, HRD, NGOs.	50 civil servants were trained each year (2021-2022).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**. The Bureau of Civil Service organized 10 trainings on "Integrity" in which 280 civil servants participated, including IOs (Integrity Affairs Organizer) and their substitute officials. According to the Bureau of Civil Service, the main emphasis was placed on the role of IOs and the processes implemented by them regarding the processes arising from the Civil Service legislation.

According to the CPC, a workshop with the participation of more than 60 organizers on the issues of good behavior of public administration system bodies According to the CSC, a workshop was held with the participation of more than 60 Integrity Affairs Organizer of the bodies of public administration system, during which, among other things, reference was made to the standard rules of conduct of public servants (objective, structure, connection with the activities of IO) and the declaration system. The speakers were the employees of the professional departments of the CPC. The training/awareness materials presented during the workshop were also developed by the CPC. The speakers were not evaluated, but the seminar was assessed positively.

According to the results of the monitoring, the main concern was that the standard rules of conduct for public servants and the code of conduct for civil servants had not yet been adopted during the organization of the training, which did not allow carrying out more targeted training.

There was no preliminary (pre) and final (post) test of the knowledge of the training participants performed. The results of the training were not evaluated at the impact level either. The issue of cooperation between the Central Security Agency and the National Security Agency in the field of the Institute of PAPs was also raised, emphasizing the fact that the initiative on the part of the Central Security Agency is low.

The issue of cooperation between the CPC and BCS in the sphere of IO institute was also raised, emphasizing the fact that the initiative of the CPC is low.

The Civil Society was not included in this process.

In such conditions, although according to the presented data, the action has been carried out quantitatively, however the strategic task (result) has not been completely performed according to the impact level (qualitative) results.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, since within the framework of this action creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity has not been fully performed.

ACTION 41. Developing distance learning modules for civil servants

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	Instruction of civil servants has been organized through the application of distance learning modules	Bureau of Civil Service of the Staff to the Prime Minister, MHTI.	Instruction is conducted according to modules (2021).	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**. According to the BCS, the distance learning modules were attended by civil servants, who held CS leadership and professional positions, of 54 relevant bodies established by the “RA Law on Civil Service”. Integrity was one of the topics of the distance learning programs.

According to the CPC, within the framework of the EU Twinning Project, the creation and launch of a digital platform for the purpose of raising awareness on integrity (anti-corruption) for civil servants is in progress, which aims to develop and create a modern, user-friendly and data protection compliant e-learning platform, which will be of particular importance in terms of the ability to deliver learning content in a targeted manner.

According to the results of the monitoring, the modules on the topic of integrity are currently being revised. In particular, there are three different modules, and revision work is currently underway, as a result of which the three modules will be combined. As to the assessment of knowledge, according to the legal regulations, it is assumed that after graduation, the trainees must pass a test task and collect the necessary credits; otherwise, not having the necessary credits may be grounds for dismissal.

Regarding this action, **the established verifiable indicators are of concern**, which are not complete and do not provide an opportunity to evaluate the performance of the implementation of actions, to identify the quantified results.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, within the framework of this action, creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity is performed.

ACTION 42. On-line broadcasting of the testing process of the competitions for filling vacant positions

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity.	The system of on-line broadcasting of the stage of testing of competitions for filling vacant positions and the information system of civil service have been put into operation.	Bureau of Civil Service of the Staff to the Prime Minister.	The stage of testing of all competitions held for filling vacant positions is broadcast since 2022.	Action is IMPLEMENTED . The strategic objective (outcome) IS PERFORMED .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **completely implemented**.

According to the results of the monitoring, the online broadcasting system and the civil service information system of the testing stage of competitions for filling of vacant positions have been launched. Currently, the competitions for the filling of vacant positions in state bodies are held together with the online broadcasting system through the civil service Information Platform.

According to the results of process (quantitative) evaluations, the action is evaluated as **IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED**, within the framework of this action, creating a decent and faithful image of a public servant through introduction of relevant mechanisms for ensuring accountability, transparency and integrity is performed.

Process (quantitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	6	100%
OF WHICH IMPLEMENTED	4	66.67 %
OF WHICH MOSTLY IMPLEMENTED	0	0%
OF WHICH PARTIALLY IMPLEMENTED	2	33.33%
OF WHICH NOT IMPLEMENTED	0	0%

Impact level (qualitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	6	100%
OF WHICH PERFORMED	2	33.33%
OF WHICH PERFORMED NOT COMPLETELY	4	66.67%
OF WHICH NOT PERFORMED	0	0%

SECTOR 5. MONITORING, OVERSIGHT AND PUBLIC COMMUNICATION

ACTION 43. Conducting regular surveys, among the general public, on corruption, public confidence and the impact of anti-corruption measures, publishing the results of survey

Final or intermediate results: at the level of the strategic objective	Expected result at the action level (2022)	Responsible body(ies)	Verifiable indicator (2022)	Monitoring result
Raising the level of effectiveness of the fight against corruption through updating the outdated measures as a result of an effective monitoring mechanism.	Through conducting a survey among the general public, including in Yerevan and the marzes of the Republic of Armenia, at least once a year, the most corrupted sectors according to the public opinion, existing corruption risks have been revealed, the public opinion on the effectiveness of anti-corruption measures implemented by the Government has been presented, and steps have been taken aimed at reducing corruption risks.	MoJ, CPC, NGOs. 2 surveys on corruption, level of public confidence and impact of anti-corruption measures have been conducted; the results of the surveys have been published on the websites of the Anti-Corruption Policy Council and the MoJ (2022).	2 surveys on corruption, level of public confidence and impact of anti-corruption measures have been conducted; the results of the surveys have been published on the websites of the Anti-Corruption Policy Council and the MoJ (2022).	Action is PARTIALLY IMPLEMENTED . The strategic objective (outcome) IS PERFORMED NOT COMPLETELY .

According to the final report published by the Ministry of Justice of RA, the action was assessed as **mostly implemented**. 1 (one) survey on corruption, level of public confidence and impact of anti-corruption measures has been conducted and published

The CPC also conducted a research and surveys in cooperation with USAID and the World Bank.³¹

According to the monitoring results, the actions performed under this operation were carried out by international organizations. The Ministry of Justice of the Republic of Armenia presented certain proposals from the point of view of need, which were summarized and included in the form of several questions within the framework of inquiries made by international organizations, regarding public opinions on corruption. The RA MoJ and the CPC did not initiate 2 separate surveys on corruption, level of public confidence and impact of anti-corruption measures.

According to the results of process (quantitative) evaluations, the action is evaluated as **PARTIALLY IMPLEMENTED**.

According to **the impact level (qualitative) results** the strategic objective (outcome) of the action **is PERFORMED NOT COMPLETELY**, since as a result of the works carried out within the framework of this action did not contribute to complete raising the level of effectiveness of the fight against corruption through updating the outdated measures as a result of an effective monitoring mechanism.

³¹ The research is available at the following link: <https://www.crrc.am/wp-content/uploads/2022/11/Corruption-in-Armenia-Research-report-Arm.pdf>

Process (quantitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	1	100%
OF WHICH IMPLEMENTED	0	0%
OF WHICH MOSTLY IMPLEMENTED	0	0%
OF WHICH PARTIALLY IMPLEMENTED	1	100%
OF WHICH NOT IMPLEMENTED	0	0%

Impact level (qualitative) assessment index 2022		
NUMBER OF PLANNED ACTIONS	1	100%
OF WHICH PERFORMED	0	0%
OF WHICH PERFORMED NOT COMPLETELY	1	100%
OF WHICH NOT PERFORMED	0	0%

CONCLUSIONS AND RECOMMENDATIONS

1. METHODOLOGICAL OBSERVATIONS AND RECOMMENDATIONS

1. **Provision of more clear and measurable verifiable indicators in the new, fifth strategy**, in particular:
 - a. providing quantitative results in verifiable indicators, for example: in the case of planning training activities, the verifiable indicators necessary to evaluate the implementation of the action regarding the number of participants and the percentage ratio of training effectiveness/participant satisfaction,
 - b. providing verifiable indicators for each expected result of the given action,
 - c. providing homogeneous verifiable indicators in the case of similar actions, for example, in the case of legislative reforms, provide for the complete reform as a verifiable indicator, which will include both legislative reforms and the adoption of regulatory legal acts necessary for the implementation of the legislation, which will make it possible to evaluate the work of different executive bodies with uniform standards,
 - d. combination of information provided from several sources for the purpose of comprehensive verification of verifiable indicators,
 - e. definition of impact level indicators that can be used to assess whether the implemented actions have led to the desired results and what impact they have had in the long term, connecting to the solution of specific strategy objectives.
2. **Provide two specific objectives under the objective of Prevention of Corruption in the new, fifth strategy, namely "Prevention of Corruption in the Public Sector" and "Prevention of Corruption in the Private Sector"**, which derives from international practice, such as the experience of the Independent Commission Against Corruption of Hong Kong³².
3. **Using the term "private sector" instead of the term "business sector" in the new strategy**, because the *business sector* is a component of the *private sector*, in addition, a similar translation of the term "private" is used in Armenian versions of international documents, for example, in the UN Convention against Corruption ratified by the RA NA.
4. **Defining a new procedure for cooperation between state administration bodies and other interested structures**, because one of the problems raised by the strategy was also the problem of cooperation, such as between the CPC and Bureau of Civil Service of the Staff to the Prime Minister, the CPC and MoJ, the MoJ and MESCS, the MESCS and Educational establishments.

2. RECOMMENDATIONS BY SECTORS

1. Prevention of Corruption

³² Official website of the Independent Commission Against Corruption of Hong Kong, <https://www.icac.org.hk/en/cpd/duty/index.html>

- **Development of a unified act of legal regulations on prevention of corruption and anti-corruption education**, which will comprehensively regulate all aspects of corruption prevention, for example, a number of corruption prevention mechanisms defined by the Law on "Public Service". Taking into account the fact that according to international experience, including the UN Convention against Corruption, anti-corruption education is carried out in parallel with the prevention of corruption, we suggest considering also the option of including the legislative regulations on anti-corruption education within the framework of the legislative act. If the RA Government decides to assign the functions of implementing the informal component of anti-corruption education to the CPC, then the transfer of this function should be gradual, as smooth as possible, in which case it is necessary to make legislative changes within the framework of the legislative acts of the education sector. In the event that the RA Government decides to assign the functions of implementing the non-formal component of anti-corruption education to the Ministry of Education, Science Culture and Sports, in this case legislative changes should also be made within the framework of the legislative acts of the education sector.
- **Assessment of the activities, resources, capacities and impact of the CPC**, followed by the identification of only those evidence and needs based proposals that will identify the main risks and develop the capacities of the CPC.
- Definition and implementation of structures for competitive delegation of functions to specialized and private structures of the civil society in the field of prevention of public corruption.

1.1. PREVENTION OF CORRUPTION (Integrity)

- **Improvement of the system for conducting integrity study**, within which framework it is recommended:
 - To publicize the conclusions of the CPC, or at least their final part, and make them available to the public before the election of the candidate by the RA SJC, the National Assembly, the Prosecutor General's Office or other competent body.
 - To introduce current integrity checking mechanisms, for example, for judges, investigators, and prosecutors.
- **Continuous improvement of the Institutes of Ethics Commissions, Integrity Officers and Persons in Charge for Anti-Corruption Programs**, within which framework it is recommended:
 - supplement the review of selection criteria for the Integrity Officers, providing for qualification requirements, including the requirement to have anti-corruption experience. In this case, it will be necessary to provide the legal basis for defining the specified requirements, which will be the basis for further changes in the passports of positions.
 - increase the range of powers of the Integrity Officers, providing for the extension of these powers to public office holders as well, which will also enable people holding public positions to benefit from the professional support of the Integrity Officers,
 - introduce tools to ensure the implementation of Article 46, Part 2, Clause 5 of the Law of the Republic of Armenia "On Public Service", according to which the Integrity Officers

keeps statistics of cases of incompatibility claims, other restrictions, violations of the rules of conduct and conflicts of interest by public servants. In addition, make this statistical data publicly available by maintaining an appropriate database: specifying the number and nature of specific offenses, the decisions made (including the results of the examination of the proceedings, including negative and positive outcomes), the name, surname and position of the persons holding the position, the types of responsibility applied, etc.,

- through legislative amendments, to empower and provide tools to the CPC to ensure the uniformity of the code of conduct (for example, according to the RA Law "On Public Service", the Investigative Committee is not obliged to accept the rules of conduct developed by the CPC as standard. The same example also applies to the National Assembly).

Taking into account the fact that the powers of IOs are defined by the Law on Civil Service and the Law on Public Service, on the basis of which the relevant provisions were fixed in the passports of IO and Civil Servants positions, therefore, in order to increase the above-mentioned powers, as well as to change the scope of distribution of powers, **it is necessary to define them in the relevant legal acts.**

1.2. PREVENTION OF CORRUPTION (declaration, gifts, impact assessment of regulation, procurement, private sector, beneficial owners, protection of economic competition)

1.2.1. Declaration

- **Continuous improvement of legislation in the field of declaration**, within which:
 - to provide tools for monitoring the declaration of expenses made abroad, in cryptocurrency and the repayment of the obligations of the official by third parties, referring to the issue of tax obligations,
 - to review the measures of responsibility for submitting incorrect or incomplete data in the declaration, because according to the current legal regulations, the threshold between administrative and criminal measures of responsibility is rather tiny.

1.2.2. Incompatibility requirements

- **Continuous improvement of legislation in the field of incompatibility requirements**, within which to provide mechanisms that derive from the essence of the requirement to transfer the shareholding to specialized trust management companies, for example, to review the possibility of implementation of trust management by individual entrepreneurs, to consider the issue of the expediency of adopting the RA Law "On Trust Management Companies".
- **Adoption of regulatory legal acts ensuring the enforcement of legislative changes in the field of incompatibility requirements**, in particular, the register and procedure for the registration and keeping records of contracts for the transfer of property to trust management by persons holding public office and public servants, providing legal norms for the management and publication of statistics regarding the aforementioned.

1.2.3. Gifts

- **Adoption of regulatory legal acts ensuring the implementation of legislative changes in the field of gifts**, in particular, the procedure for maintaining the gift registry.

1.2.4. **Impact assessment of regulation**

- **Implementation of the accreditation system for anti-corruption examination of legal acts**, which is an internationally proven practice in which expertise is delegated to anti-corruption experts or specialized CSOs who have passed special accreditation in the procedure established by the state.

1.2.5. **Private Sector**

- **Implementation and development of new anti-corruption tools in the private sector, in particular, providing the CPC with the function of preventing corruption in the business sector and creating a relevant department, the latter introducing a toolkit for the implementation of consultative meetings within the framework of cooperation with the business sector aimed at assessing corruption risks and submitting proposals on reforms in target sectors**, which is an internationally proven practice, where businessmen to speak freely about sector-specific corruption schemes and other issues such as taxes, customs, public procurement, licenses and permits, since the information obtained is not used to prosecute, but to raise issues.
- **Definition and implementation of mechanisms for competitive delegation of functions to specialized and private structures of civil society in the field of prevention of private corruption.**
- **Increasing the effectiveness of the existing corruption prevention system in the private sector according to target sectors**, in particular:
 - Institutional development of the state register through the creation of a separate department dealing with the issues of beneficial owners.
 - Institutional strengthening of the HRD office in the context of protection of business interests in the relationship between the private sector and government bodies or introduction of the Institute of Business Ombudsman.
 - Institutional development of the Ministry of Economy in the field of prevention of corruption, in particular, promotion of anti-corruption compliance requirements.
 - Strengthening the capacity of officials exercising control over the implementation of public procurement, as well as those processes.
 - Strengthening the capacities of officials in the field of protection of economic competition.

1.2.6. **Procurement**

- **Modernization and improvement of anti-corruption tools in procurement planning system**, in particular, the development of unified specifications for the main products services and works purchased by customers and the introduction of a unified system for determining and planning the estimated prices of items with similar specifications automatically.
- **Modernization of the e-procurement system by equipping it with innovative smart tools for anti-corruption control and monitoring.**
- **Improvement of control mechanisms for procurements from one-person.**

1.2.7. Anti-corruption compliance programs

- Availability of anti-corruption compliance programs as:
 - provision of legal requirements that exclude or mitigate the criminal liability of a legal person,
 - provision of legislative requirements that provide a criterion that gives priority to the provision of state support to representatives of the business sector.

1.2.8. Beneficial owners

- Introduction of unified mechanisms for verification of the reliability of data of beneficial owners, introduction of verification methodology and technical regulations.
- Modernization and improvement of the electronic system of declaration of beneficial owners of the Agency for State Register of Legal Entities;
 - exclude technical failures of the system due to the system overload caused by a significant increase in the number of declaring legal persons.
 - be guided by open contracting data standards and open source standards, as well as a user-friendly and machine-readable format,
 - equip with innovative smart tools to detect irregularities (e.g. red flags),
 - ensure software interoperability between domestic platforms related to beneficial owners, in particular, e-procurement and RA Corruption Prevention Commission systems, as well as through establishing international cooperation between foreign registries of beneficial owners.
- Development of uniform standards for identification of beneficial owners and development of standard-based accessible guidelines and training programs for the identification of beneficial owners according to target groups:
 - for declarant legal entities, according to the specifics of the organizational legal type,
 - for the state registry and other state bodies related to the field of beneficial owners.

1.2.9. Protection of economic competition

- Improvement of the electronic toolkit in the field of the protection of economic competition: introduction of computer security screening programs and other tools, such as red flags, that highlight irregularities in the economic market.

2. Fight against corruption

2.1. Training of criminal prosecution bodies

- 2.1.1. Organization of special trainings with the involvement of international experts, for investigators, prosecutors and judges dealing with individual corruption crimes, including illicit enrichment, development of methodological guidelines for investigation of individual crimes, ensuring their continuous professional development.

2.2. Improvement of RA Law "On Confiscation of Property of Illicit Origin"

- 2.2.1. Improvement of the RA Law "On Confiscation of Property of Illicit Origin" based on the international standards and the reference standards established by the opinion of the Venice Commission on 19 December, 2022, based on the request of the RA Constitutional Court. In this regard, it is necessary to make the legal regulations more specific and, in particular, to clarify the burden of proof defined by law in the mentioned proceedings.

2.3. Improvement of the institute of criminal liability of legal persons

- 2.3.1. Review of regulations regarding the institute of criminal liability of legal persons and reduction of highly discretionary regulations in terms of bringing them to criminal liability. At the same time, it is necessary to carry out an impact assessment of the institute of bringing legal persons to criminal liability on the business environment and highlight the existing problems.

2.4. Strengthening international cooperation in investigating and disclosing corruption related crimes

- 2.4.1. Amendment and adoption of the RA Law "On Legal Assistance in Criminal Cases" providing opportunities for international cooperation in corruption cases, which will enable criminal prosecution bodies to cooperate more effectively with international structures to identify and prosecute persons accused of committing alleged corruption.

2.5. Improvement of the whistleblowing system

- 2.5.1. Within the framework of the new, fifth anti-corruption strategy, the reforms related to the whistleblowing system should be included in the anti-corruption sector, taking into account the anti-corrupt nature of that system. In other words, they should be considered not as a part of the prevention of corruption, but as an integral part of the fight against it.
- 2.5.2. Establishing a mechanism with the introduction of a whistleblowing system in the field of anti-corruption, according to which internal and external notifications will be implemented through a single electronic platform, at the same time ensuring the investigation of the submitted reports by the competent authorities/bodies.
- 2.5.3. Reviewing the legal regulations for the selection and appointment of the responsible persons on whistleblowing issues. Ensuring their continuous professional development through training and other educational activities.
- 2.5.4. Improvement of the system of keeping statistics on whistleblowing cases, introduction of mandatory and unified rules of keeping statistics.
- 2.5.5. Assign to "EKENG" CJSC the authority of improving the electronic notification platform and security guarantees, as well as ensuring safety.

3. Public Awareness and Anti-Corruption Education

3.1. Anti-Corruption Education

- 3.1.1. **Development of a unified act of legal regulations on anti-corruption education**, in the event that anti-corruption education is not included in the unified act of legal regulations on the prevention of corruption. In this case, a separate act on anti-corruption education should comprehensively regulate anti-corruption education and public awareness, bearing in mind the fact that according to international experience, including the UN Convention against Corruption, anti-corruption education is considered one of the three pillars of the fight against corruption. If the RA Government decides to assign the functions of the implementation of the informal component of anti-corruption education to the Corruption Prevention Commission, then the transfer of this function should be gradual, as smooth as possible, in which case it is necessary to make legislative changes within the framework of the legislative acts in the field of education. In the event that the RA Government decides to assign the functions of implementing the non-formal component of anti-corruption education to the Ministry of Education, Science, Culture and Sports, in this case, legislative changes should also be made within the framework of legislative acts in the field of education.
- 3.1.2. Implementation of anti-corruption education mechanisms in pre-school, educational, secondary, primary (craftsmanship) education, secondary vocational and higher educational institutions, as well as in post-university educational institutions; improvement of existing mechanisms according to each subject composition (kindergarten children, pupils, students, educational and pedagogical staff, administrative staff) and age characteristics,
- 3.1.3. Implementation of non-formal anti-corruption education mechanisms, improvement of existing mechanisms (anti-corruption educational programs, networks, schools, laboratories and clubs, journals, presentations, plays, games, cartoons, trainings, implementation of scientific research commissioned by the government and relevant anti-corruption bodies for applied purposes, national and international conferences),
- 3.1.4. Development and dissemination of anti-corruption educational and methodological materials (formal and informal education) according to each subject composition (kindergarten children, pupils, students, educational and pedagogical staff, administrative staff) and age characteristics.

3.2. Public Awareness

- 3.2.1. Implementation of public awareness mechanisms and, improvement of existing mechanisms (targeted social advertisements, public discussions and conversations with the population of the community and local NGOs, nationwide flash mobs on Anti-Corruption Day on 9 December, as well as a Conference and discussions with youth and adults on Anti-Corruption Day on 9 December, computer games - informative and situational, based on possible scenarios taken from real life, performances in theaters).

- 3.2.2. To include society in the broad sense: private sector organizations, state bodies and organizations, non-commercial organizations (NGOs, Foundations) in the subject composition of public awareness.
- 3.2.3. Detailed planning of all the activities listed above as part of the anti-corruption education and public awareness communication action plan, which should be adopted based on the development guidelines of the fifth strategy, including through a participatory, inclusive and transparent process based on the baseline indicators.

4. MONITORING, CONTROL AND PUBLIC COMMUNICATION

- 4.1. Develop one universal national tool for assessing public perception of corruption for the Republic of Armenia, which will reflect Armenia's needs and expectations.

Based on the above, the expert group also developed the structure of the new fifth anti-corruption strategy, which is attached to this report as Annex 1.

3. CONCLUSIONS BY SECTORS

#	Sectors	Process (quantitative) IMPLEMENTATION INDICATOR	Impact level (Qualitative) PERFORMANCE INDICATOR
SECTOR 1	DEVELOPMENT OF ANTI-CORRUPTION INSTITUTIONAL SYSTEM	28.57%	0%
SECTOR 2	PREVENTION OF CORRUPTION	26.32%	26.32%
SECTOR 3	INVESTIGATION OF CORRUPTION-RELATED CASES	70%	50%
SECTOR 4	PUBLIC AWARENESS AND ANTI-CORRUPTION EDUCATION	66.67%	33.33%
SECTOR 5	MONITORING, CONTROL AND PUBLIC COMMUNICATION	0%	0%

4. FINAL CONCLUSIONS

Process (quantitative) assessment index 2022	
NUMBER OF PLANNED ACTIONS	43
OF WHICH IMPLEMENTED	18
OF WHICH MOSTLY IMPLEMENTED	9
OF WHICH PARTIALLY IMPLEMENTED BUT IMPLEMENTATION IS SUSPENDED	1
OF WHICH PARTIALLY IMPLEMENTED	10
OF WHICH NOT IMPLEMENTED	5
PERFORMANCE INDICATOR	41.86%

Impact level (qualitative) assessment index 2022	
NUMBER OF PLANNED ACTIONS	43
OF WHICH PERFORMED	12
OF WHICH PERFORMED NOT COMPLETELY	27
OF WHICH NOT PERFORMED	4
PERFORMANCE INDICATOR	27.91%

ANNEX 1. PROPOSED STRUCTURE OF ANTI-CORRUPTION STRATEGY FOR 2023-2026

CONTENTS

SECTION I. THE CURRENT SITUATION OF ANTI-CORRUPTION POLICY AND THE DEVELOPMENT PROCESS OF THE 5TH ANTI-CORRUPTION STRATEGY

1. The Republic of Armenia Anti-Corruption Strategy and its Implementation Action Plan for 2019-2022: Outcomes and Challenges.
2. Assessment of the International Obligations assumed by the Republic of Armenia in the Anti-Corruption Sphere.
3. Corruption Perception in the Republic of Armenia and assessment of Situation.
4. Developing Process the Anti-Corruption Strategy for 2023-2026.

SECTION II. THE ANTI-CORRUPTION POLICY IN 2023-2026: OBJECTIVES AND DIRECTIONS OF THE ANTI-CORRUPTION STRATEGY

1. *OBJECTIVE 1. ANTI-CORRUPTION EDUCATION AND PUBLIC AWARENESS*

1.1. **Direction 1.1. Introduction and improvement of the anti-corruption education mechanisms**

- 1.1.1. Implementation of anti-corruption education mechanisms in pre-school, educational, secondary, primary (craftsmanship) education, secondary vocational and higher educational institutions, as well as in post-university educational institutions and improvement of existing mechanisms.
- 1.1.2. Implementation of non-formal anti-corruption education mechanisms, improvement of existing mechanisms (anti-corruption educational programs, networks, schools, laboratories and clubs).
- 1.1.3. Development and dissemination of anti-corruption educational and methodological materials (formal and informal education).

1.2. **Direction 1.2. Improving public awareness mechanisms**

- 1.2.1. Development, approval and implementation of the plan of anti-corruption public communication and awareness activities according to target sectors and groups, including for representatives of the business sector, regarding the existing mechanisms for the protection of their rights.

- 1.2.2. Developing the capacity of civil society structures, defining public awareness and training mechanisms through cooperation with them and implementing them according to target sectors and groups, including through collective actions in the business sector.

2. OBJECTIVE 2. PREVENTION OF CORRUPTION

2.1. SPECIFIC OBJECTIVE 2.1 PREVENTION OF CORRUPTION IN THE PUBLIC SECTOR

2.1.1. Direction 2.1.1. Improving the legal framework of corruption prevention and anti-corruption education and defining mechanisms for statistics

- 2.1.1.1. Development of a unified act of legal regulations on corruption prevention and anti-corruption education.
- 2.1.1.2. Improvement of the procedures of proceedings carried out by the Corruption Prevention Commission. definition of specifics,
- 2.1.1.3. Prescribing a unified mechanism for maintaining statistics in the field of prevention of corruption.

2.1.2. Direction 2.1.2. Strengthening of institutional mechanisms for prevention of corruption in the public sector

- 2.1.2.1. Assessment of the activities, capacities and resources of the Corruption Prevention Commission in the Public Sector and continuous capacity building in the direction of prevention of corruption and anti-corruption education in the Public Sector.
- 2.1.2.2. Continuous improvement of the Institutes of Ethics Commissions, Integrity Officers and Persons in Charge for Anti-Corruption Programs.
- 2.1.2.3. Definition and implementation of structures for competitive delegation of functions to specialized and private structures of the civil society in the field of prevention of public corruption.

2.1.3. Direction 2.1.3. Ensuring and improving the unity of the integrity system

- 2.1.3.1. Implementation of codes of conduct and their enforcement mechanisms in state and local government bodies.
- 2.1.3.2. Improving tools and mechanisms in the field of conflicts of interest, incompatibility requirements and other restrictions.
- 2.1.3.3. Development of mechanisms for implementation of gift acceptance restrictions.
- 2.1.3.4. Ensuring and strengthening the uniformity of measures of responsibility for compliance with the integrity requirements.

2.1.4. Direction 2.1.4. Improvement of the mechanisms for prevention of corruption and other mechanisms in the public sector

- 2.1.4.1. Improvement of the notification system.

- 2.1.4.2. Implementation of corruption risk assessment and management system in the state and local self-government bodies.
- 2.1.4.3. Improvement of the system for conducting integrity study.
- 2.1.4.4. Implementation and improvement of the mechanisms for control over the financial activities of the parties.

2.2. *SPECIFIC OBJECTIVE 2. PREVENTION OF CORRUPTION IN THE PRIVATE (BUSINESS) SECTOR*

- 2.2.1. Direction 2.2.1. Strengthening of institutional mechanisms for prevention of corruption in the private sector**
 - 2.2.1.1. Assigning the function of preventing corruption in the private sector to the Corruption Prevention Commission, creating a relevant department and introduction of a new toolkit (consultative meetings) for cooperation with the business sector.
 - 2.2.1.2. Institutional strengthening of the HRD office in the context of protection of business interests in the relationship between the private sector and government bodies.
 - 2.2.1.3. Institutional development of the state register of legal entities.
 - 2.2.1.4. Strengthening the capacity of officials exercising control over the implementation of public procurement, as well as those processes.
 - 2.2.1.5. Strengthening the capacities of officials in the field of protection of economic competition, as well as of the officials responsible for the investigation and detection of crimes
 - 2.2.1.6. Definition and implementation of mechanisms for competitive delegation of functions to specialized and private structures of civil society in the field of prevention of private corruption

- 2.2.2. Direction 2.2.2. Anti-corruption compliance as a means of combating corruption in the business sector**
 - 2.2.2.1. Adoption of the new Code of Corporate Governance in accordance with OECD G20 requirements and implementation of incentive measures towards its implementation.
 - 2.2.2.2. Encouraging the implementation of anti-corruption compliance mechanisms, with the provision of the legal requirement and other incentive norms providing for their presence as a precluding or mitigating circumstance of criminal liability of a legal entity, introduction of mechanisms in state and community commercial organizations and the first 100 large taxpayer companies.
 - 2.2.2.3. Improving other anti-corruption mechanisms in commercial organizations with state and community participation.

- 2.2.2.4. Direction 2.2.3. Improvement of the institute for identification of beneficial owners of legal entities**
 - 2.2.2.5. Implementation of unified mechanisms for verification of the reliability of data of beneficial owners, introduction of verification methodology and technical regulations.

2.2.2.6. Modernization and improvement of the electronic system of declaration of beneficial owners of the Agency for State Register of Legal Entities.

2.2.2.7. Development of uniform standards for identification of beneficial owners and development of standard-based accessible guidelines and training programs for the identification of beneficial owners according to target groups.

2.2.3. Direction 2.2.4. Improvement of anti-corruption mechanisms in the field of public procurement

2.2.3.1. Improving anti-corruption mechanisms in field of public procurement.

2.2.3.2. Improving integrity mechanisms in the process of public procurement.

2.2.3.3. Modernization of the e-procurement system by equipping it with innovative smart tools for anti-corruption control and monitoring.

2.2.3.4. Modernization and improvement of anti-corruption tools in procurement planning system.

2.2.3.5. Mitigating corruption risks in one-person procurements.

2.2.4. Direction 2.2.5. Improvement of mechanism in the field of the protection of economic competition

2.2.4.1. Improvement of the electronic toolkit in the field of the protection of economic competition.

3. Objective 3. COMBATTING CORRUPTION

3.1. Direction 3.1. Institutional strengthening of law enforcement agencies for anti-corruption response.

3.1.1. Institutional strengthening of the Anti-Corruption Committee.

3.1.2. Conducting professional trainings and workshops on anti-corruption topics for investigators of the Anti-Corruption Committee, prosecutors of the Department of Supervision over Legality of Pre-trial Proceedings in the Anti-Corruption Committee of the Prosecutor General's Office of the RA, and prosecutors of the Department for Confiscation of Property of Illicit Origin.

3.1.3. Development of comprehensive methodology and guidelines for detection and investigation of corruption crimes.

3.1.4. Conducting professional preparation and trainings based on developed materials.

3.1.5. Implementation of a mechanism for the involvement of experts with knowledge in anti-corruption, economic/financial and other necessary fields in the work of law enforcement agencies to combat corruption.

3.2. Direction 3.2. Institutional strengthening of anti-corruption courts

3.2.1. Conducting a study of issues related to the competence of cases considered by anti-corruption courts.

3.2.2. Studying the possibilities of developing and implementing a toolkit aimed at eliminating conflicts between the Criminal Chamber in the Court of Cassation and the sub-chamber investigating corruption crimes in the Anti-Corruption Chamber on issues of uniform application of the law.

3.2.3. After the establishment of the Specialized Anti-Corruption Court, judges hearing cases of corruption in the Court of Appeal, and after the establishment of the Anti-Corruption Court of Appeal, conducting periodical trainings for all judges of the Anti-Corruption Chamber of

this court, the Court of Cassation, taking into account the specifics of considering cases of corruption, including taking into account the existing international standards.

- 3.2.4. Development of methodological guidelines due to the specifics of the cases of confiscation of property of illicit origin and the investigation of corruption crimes examined by specialized anti-corruption courts and judges
- 3.2.5. Implementation of mechanism for the involvement of experts with knowledge in anti-corruption, economic/financial and other necessary fields in the work of anti-corruption courts.
- 3.2.6. Establishing a uniform system of statistics of corruption crimes and improving the existing mechanisms.

3.3. Direction 3.3 Combating corruption in the judicial system

- 3.3.1. Modernizing the system of distribution of cases in courts.
- 3.3.2. Improvement of the mechanisms for evaluation of activity of judges, including judges specializing in anti-corruption, taking into account international experience.

3.4. Direction 3.4. Improving the mechanisms of recovery and management of property acquired as a result of corruption crimes, as well as of illicit origin

- 3.4.1. Improvement of the management mechanisms of property banned and (or) confiscated for corruption crimes, confiscated as a result of proceedings on the confiscation of property of illicit origin.
- 3.4.2. Improvement and modernization of the institute of confiscation of property of illicit origin (study of international experience and legal positions of the Venice Commission).
- 3.4.3. Expansion and modernization of anti-corruption mechanisms in the international and transnational arena with the participation of the Republic of Armenia, improvement of the mechanisms of international mutual aid cooperation.

3.5. Direction 3.5. Improvement and modernization of the whistleblowing system

- 3.5.1. Review of the whistleblowing system model, as well as improvement of whistleblowing legislation
- 3.5.2. Selection and appointment of the responsible persons on whistleblowing issues and training of their professional activities
- 3.5.3. Improvement of the system of keeping statistics on whistleblowing cases, introduction of mandatory and unified rules of keeping statistics.
- 3.5.4. Improving the electronic notification platform and security guarantees.

3.6. Direction 3.6. Outlining the vision for the improvement of the Institute of Criminal Responsibility of Legal Entities

- 3.6.1. Studying the issues raised by the studies and initiated proceedings since the institution of criminal liability of legal entities came into force and raising the issues.

- 3.6.2. Conducting a study on the definition of mechanisms for anti-corruption incentive structures within the framework of the Institute of Criminal Liability of Legal Entities and, as necessary, implementing legislative changes.
- 3.6.3. Assessment of the current situation in relation to guaranteeing the principle of proportionality when applying sanctions to legal entities and, if necessary, implementation of reforms.

4. *OBJECTIVE 4. IMPROVING ANTI-CORRUPTION MONITORING AND EVALUATION SYSTEM*

- 4.1. **Direction 4.1.** Improvement of anti-corruption monitoring and evaluation mechanisms.
- 4.2. **Direction 4.2.** Strengthening the institutional system of anti-corruption monitoring and evaluation.
 - 4.2.1. Capacity development of RA Ministry of Justice.
 - 4.2.2. Capacity Building of the Anti-Corruption Policy Council.
 - 4.2.3. Capacity development of anti-corruption CSOs.

SECTION III. COORDINATION, MONITORING AND EVALUATION OF ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION ACTION PLAN FOR 2023-2026

- 1. The coordination system of the anti-corruption strategy and its implementation action plan.
- 2. Monitoring and evaluation procedure of anti-corruption strategy and its implementation action plan: evaluation methodology.

SECTION IV. FINANCIAL ASSESSMENT OF COSTS OF ANTI-CORRUPTION STRATEGY AND ITS IMPLEMENTATION ACTION PLAN FOR 2023-2026

- 1. Financial assessment of costs
- 2. Participation and Support of Donor Institutions.