

ANNUAL REPORT ON ACTIVITIES OF TI BIH FOR 2024

**Overview of the activities and activities of the Anti-Corruption Association
Transparency International in Bosnia and Herzegovina**

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PROTECTION OF PUBLIC RESOURCES

PUBLIC PROCUREMENT OPEN, COMPETITIVE AND TRANSPARENT

Transparency International in Bosnia and Herzegovina (TI BiH) continued to continuously warn about irregularities in public contracting, pointing to cases that undermine transparency and open up space for corruption.

A significant challenge over the past year has been the lack of public procurement by an increasing number of public companies. Given that JP Sarajevoputevi has ignored the Law on Public Procurement for years, TI BiH filed a criminal complaint against this public company in 2019. The Prosecutor's Office of the Sarajevo Canton decided not to initiate an investigation, and TI BiH filed a complaint against this decision, because impunity for such phenomena can have long-term consequences, especially bearing in mind that Ceste d.d. Mostar recently made a similar decision and stopped conducting public procurement procedures.

In response from the management of JP Cesta d.d. Mostar stated that they are not obliged to carry out public procurement procedures, because they operate as a commercial company without a monopoly on the market.

TI BiH warned that such an attitude could set a dangerous precedent for other public companies, opening up space for

corruption and misuse of public funds by circumventing transparent procedures

During 2024, an order was received not to conduct an investigation in the case of RITE Gacko, in which TI BiH filed a criminal complaint back in 2021, because RITE Gacko awarded contracts worth 29.5 million BAM to Optima Group without conducting transparent public procurement procedures.

The District Prosecutor's Office in Trebinje refused to initiate an investigation, and TI BiH filed an appeal against this decision and filed a complaint against the Chief Prosecutor for failure to notify within the legal deadline.

A similar situation was recorded in the Kreka Tuzla Mine, where the management used 149 direct agreements for the rental of mining equipment, bypassing legal limits. Although the investigation was opened in 2022, it was dropped a year later on the grounds that the law had been violated "in the interest of the service." TI BiH has filed an appeal against this decision, emphasizing the need for consistent application of the law and accountability in public procurement.

Furthermore, TI BiH also pointed to potential conflicts of interest in public

procurement, such as the case of the Olympic Center "Jahorina", where the contract for promotion was awarded to the Basketball Club "Jahorina", whose president, Nedeljko Elek, also sits on the supervisory board of this center. This dual role violates the Public Procurement Act, which prohibits individuals in such positions from benefiting from contracts awarded by the institutions they manage.

The submission of reports to the relevant institutions (27) also continued, which in most cases acted on the same. One of the examples is the conduct of the Public Procurement Agency, which, based on the request of Transparency International, monitored the public procurement procedure for the construction of the Memorial Complex in the City of East Sarajevo, and filed a report with the Special Department for the Suppression of Corruption, Organized and the Most Serious Forms of Economic Crime of the Republic Public Prosecutor's Office due to the existence of elements of a criminal offense, because the Law on Public Procurement was circumvented in such a way that the funds for The building was handed over to the Veterans' Organization, which then hired a contractor.

TI BiH has filed a criminal complaint against the Tuzla Canton Police Directorate for irregularities in the procurement of armored personnel carriers worth 5.2 million BAM. In the procedure, the conditions of the tender documentation

were changed, which favored the only bidder. An advance payment of 50% of the total value was made to that bidder before the delivery of the bank guarantee, which is contrary to the tender.

The transporters were not delivered within the agreed deadline, and no protective measures, such as the activation of a bank guarantee, were initiated to protect budget funds. These irregularities indicate serious violations of legal procedures and possible favoring of the selected bidder.

In 2024, TI BiH continued its activities in the field of protection of living resources, refreshing the data in the Register of Concessions in BiH. The Register, which was created as a result of the non-transparency of this area that is present in BiH, provides comprehensive information on the legislative framework, permits, fees, concessionaires, as well as budget revenues collected by concession fees from all levels of government in BiH.

Previously, data were collected on concessionaires, concession contracts, the method of calculating fees, paid obligations and debts that concessionaires have towards entities, cantons and local communities until 2022, and this year data on concessions and fees for 2023 were obtained and entered.

TI BiH has provided active support in the work of activists and informal groups of

citizens who have fought throughout BiH for the protection of their rights through environmental protection, preventing the illegal exploitation of natural resources in their surroundings.

Thus, support was provided to the informal group of citizens "Let's Protect the Mandeka Springs" in their multi-year struggle for the protection of water sources in Livno. After six years of efforts, the City Council of Livno annulled the approval for the granting of a concession for the exploitation and exploration of water at the "Poljane" site.

TI BiH assisted the locals in collecting and analyzing key documentation that proved irregularities in the concession granting process, including the absence of public hearing, water acts, and environmental impact studies. Based on this evidence, the locals successfully advocated for a discussion at the City Council session, which resulted in the withdrawal of consent.

This decision represents an important step towards the termination of the concession contract, which would permanently protect the sources of Mandek, and this case can be seen as an example of successful cooperation with the so-called "grassroots" organizations as part of the local community's struggle for responsible management of natural resources, which at the same time strengthens awareness of the importance of transparency and accountability in the process of granting concessions.

TI BiH, in cooperation with the Helsinki Citizens' Parliament, organized a public forum entitled "Environment - Management and Protection of Urban and Rural Areas", which was held on October 10, 2024 at the Youth Center in Banja Luka. At the forum, experts and activists from Serbia and Bosnia and Herzegovina discussed key challenges in environmental protection, including the preservation of parks, the negative consequences of mining in rural areas and other aspects of sustainable management of natural resources.

This event brought together a large number of citizens, which is an indicator of the growing public interest in the issues of conservation of natural resources and responsible management of urban and rural areas, but also a strong indicator of the importance of civil society organizations as actors who are ready to help citizens protect their rights and raise awareness of the importance of environmental protection through such initiatives.

Transparency International, together with the Center for the Environment, prepared and submitted a number of amendments to the Proposal of the Law on Amendments to the Law on Geological Exploration of the Republic of Srpska, which were submitted to the Legislative Committee of the National Assembly of the Republic of Srpska, requesting that they be included in the Report of the working body and that MPs vote on them at the tenth regular session of the Assembly.

Certain provisions of the Proposal of this Law completely seek to exclude the public and local self-government bodies from the decision-making process, which would completely centralize it in the Government of the Republic of Srpska, bypassing the obligation of concession and legal procedures and relations, endangering the established rules in the allocation of public resources at their disposal.

During 2024, TI BiH continued its efforts to improve the public procurement system in BiH, actively participating in consultations for the development of the Public Procurement Development Strategy for the period 2024-2028. Suggestions included a revision of deadlines in the strategy to improve the efficiency of the process, and highlighted the need for stronger enforcement mechanisms to ensure accountability. Also, as part of the comments on the Anti-Corruption Strategy, TI BiH proposed expanding the Procurement Portal to include training for investigative bodies, which would improve the understanding of the law on public procurement and strengthen the control and fight against corruption in this sector.

In order to show trends in the implementation of certain provisions of the Law on Public Procurement, in the period from the entry into force of its amendments from 2022, until the end of August 2024, TI BiH published the publication "[Monitoring the implementation of the Law on Public](#)

[Procurement for the period December 2022 - August 2024](#)".

It analyses the effectiveness of the implementation of amendments to the Law on Public Procurement, focusing on procurement planning, exemptions from the application of the law, and non-transparent procedures. It contains concrete examples from the practice of six cities and one public company, with the aim of providing insight into current trends and recommendations for improvement.

Furthermore, when we talk about advocacy activities, TI BiH, together with the Atelier for Social Change Foundation – ACT, organized an expert discussion: *Concession Contracts in BiH - Problems and Opportunities for Legal Improvement*, which aims to improve the legal framework in the field of concessions in accordance with EU directives and international obligations, with a special focus on access to justice in cases of protection of the right to a healthy and preserved environment. During the discussion, the findings of TI in BiH - Analysis of the concession system in Bosnia and Herzegovina were presented, as well as a single electronic register of concession contracts throughout the country.

When it comes to monitoring projects from the Economic and Investment Plan, TI BiH has prepared two case studies on projects financed through WBIF – *Reconstruction and Modernization of the Brčko River Port, Phase 1*

and *Mediterranean Corridor: Railway Part Šamac – Doboј – Rječica on Corridor Vc in BiH.*

As part of the initiative, on June 5, 2024, in Sarajevo, in cooperation with the Institute for Cooperation and Development of Albania and the Permanent Secretariat of the Transport Community, a round table entitled "*Promoting Inclusivity in the Implementation of the Economic and Investment Plan (EIP)*" was organized, which brought together representatives of international and domestic institutions, civil society organizations and other relevant stakeholders in highlighting the key role of CSOs in ensuring transparency,

Accountability and inclusiveness in infrastructure projects. Particular attention was paid to the importance of monitoring investments and their promotion through the cooperation of all parties involved.

Furthermore, when it comes to foreign investments, TI BiH, as part of the Western Balkans China Policy Team regional network, has developed a *policy memo* dedicated to strengthening standards of transparency and accountability in contracts with Chinese companies, emphasizing the need to harmonize with international norms and protect the interests of local communities.

REDUCE THE SPACE FOR ABUSES IN THE PUBLIC SECTOR

In order to reduce the scope for abuse in the public sector, TI BiH has improved the transparency and availability of key information on the work of public authorities through updating databases covering business, finance, governance and other important aspects.

[The database of public companies](#) contains data on operations, profits, losses, number of employees and discretionary costs for 458 public companies in BiH. In order to update the databases, 394 requests for free access to information were sent, and over 70% of responses were received.

The database of public institutions includes information on managing bodies, remuneration of directors and members of supervisory boards, and budgets for 1,700 public institutions. [The database of the distribution of public funds to associations and foundations](#) provides insight into the amounts, criteria and beneficiaries of grants awarded by public authorities, and during 2024, over 14,000 grants awarded to associations and foundations during 2022 and 2023 were entered, which significantly increased the transparency of the use of public resources.

At the beginning of 2024, TI BiH, together with a coalition of non-governmental

organizations, started working on the so-called "accountability platform," which aims to monitor the accountability of institutions, public officials and political parties through a joint approach of several civil society organizations, ensure support for anti-corruption reforms and improve integrity mechanisms by providing relevant proposals, transparent consultations on necessary solutions and dialogue with all relevant actors. It articulates citizens' demands through an open dialogue with decision-makers.

A common methodology for monitoring corruption risks was developed, and an analysis of key aspects of the anti-corruption framework in Bosnia and Herzegovina was made, i.e. a presentation of existing legal solutions, challenges in their implementation, and the identification of key obstacles and recommendations.

Furthermore, when it comes to political integrity, TI BiH continued through

CREATING PREREQUISITES FOR THE BUSINESS SECTOR TO OPERATE ON THE PRINCIPLES OF INTEGRITY

Throughout 2024, TI BiH has continuously worked on creating preconditions for private sector operations on the principles of integrity, providing support to those who have faced unfair competition and non-transparent procedures in public procurement. Through legal and procedural assistance to bidders, TI BiH pointed out irregularities, and one of the highlighted

participation in regional activities, where analyses of the legislative framework when it comes to political integrity were made.

Also, within these activities, data on public procurement, financing of political parties and property declarations of elected officials were collected, and indicators were set that will indicate risks such as: whether donors of political parties receive public contracts, whether companies owned by public officials win public contracts, and whether companies owned by their family members win public contracts. and to what extent there will be an increase in public spending during election years. The selection of the indicators was preceded by meetings with members of the Domestic Advisory Group (DAG), which includes representatives of institutions, non-governmental organizations, academia and the media. DAG members participated in both regional and bilateral meetings with members from other countries.

cases refers to irregularities in public procurement procedures at the contracting authority Lottery of BiH.

TI BiH, following this authority after reporting irregularities, determined that in the new procedure, the conditions identical to those that had previously triggered the initiation of misdemeanor proceedings were re-established.

This information was forwarded to the Public Procurement Agency, which promised to conduct monitoring, but by the end of the year there was no information about scheduling a hearing, although the request for misdemeanor proceedings was submitted in September 2023.

In addition to support in the field of public procurement, TI BiH has also provided legal assistance in cases concerning other aspects of business. One example is the intervention in Brčko, where a legal entity

was denied a request to connect to the water supply network on the basis of an explanation that was not in accordance with legal regulations.

After TI BiH pointed out irregularities in the actions of the competent public company, the request was approved, enabling the implementation of the necessary infrastructure works.

ENSURING INTEGRITY IN POLITICS

FAIR AND HONEST ELECTIONS

In anticipation of the 2024 Local Elections in BiH, Transparency International BiH (TI BiH) has launched a comprehensive process of field and media monitoring of the pre-election activities of political entities in Bosnia and Herzegovina. Over 50 observers across BiH monitored the behavior of political entities and their candidates in the field, as well as their media representation and activities in the sphere of online promotion.

The monitoring lasted for two months of the so-called pre-election period (July, August) and a month of official campaign (September), including the election day itself. The objectives of the monitoring were to record the behavior of parties and candidates, detect the misuse of public resources for party promotion, estimate the costs of the election campaign and monitor the behavior of public institutions and companies in the pre-election process.

During this period, the monitoring included 26,000 candidates and 168 political entities in the 2024 Local Elections, and activities took place in all local communities in Bosnia and Herzegovina, and an interactive map was published where 769 works worth 599,265,788 BAM and 336 different donations to various categories of the

population with a total value of 59,053,354 BAM were located.

Based on the monitoring and the data resulting from it, Transparency International in BiH presented the results of the monitoring of election campaign costs, which show that by October 1, the parties spent about 10.8 million BAM on billboards, advertisements in the media (television and print media), Meta ads and pre-election rallies. In the last three months, TI BiH observers have recorded over 2,570 examples that can be characterized as the use of public resources for the election campaign.

123 reports have been submitted to the competent institutions, and the Central Election Commission has so far imposed 18 sanctions in the total amount of 115,500 BAM on the reports of the TI BiH.

The monitoring of pre-election activities for the 2024 Local Elections was conducted in a specific context, which is reflected in the changes made to the Election Law of BiH by the decisions of the High Representative, which deal with the issue of misuse of public resources in more detail.

These changes were a kind of test for candidates and political entities who participated in the elections under

somewhat stricter rules, as well as for the Central Election Commission, local election commissions and other competent authorities, as well as for civil society organizations such as TI BiH that deal with the supervision of the electoral process.

Bearing in mind the given circumstances, during the preparatory period, TI BiH paid special attention to these changes and adapted the methodological framework in such a way as to include the treated changes in the most objective way and enable the treatment of the competent authorities.

However, although the CEC received over 140 reports for the misuse of public resources with supporting materials and

evidence, most of the sanctions imposed by this body against political entities were related to premature campaigning, i.e. misuse of means of communication and publication on social networks.

As an example, a fine of 3,000 KM [imposed for violating the election law against the Democratic People's Alliance \(DNS\) is highlighted, Nenad Nešić, the Minister of Security of Bosnia and Herzegovina and the president of that party, promised help and support to party supporters from Višegrad at a pre-election rally in employment in the institutions of BiH if they achieve a good result in the elections, which can be heard on the audio recording that TI BiH submitted to the CEC and the competent prosecutor's office.](#)

APPOINTMENTS/EMPLOYMENT AND EXERCISE OF PUBLIC OFFICE IN THE PUBLIC SECTOR FREE FROM UNDUE INFLUENCE

During the reporting period, TI BiH, in cooperation with the Center for Integrity in the Defence Sector (CIDS) from Oslo, organized an event entitled "Formal and Informal Rules in the Functioning of Public Administration in the Western Balkans", where a study was presented assessing the extent to which both pillars, formal and informal, are aligned with international standards in terms of merit-based professionalism, impartiality and ethical performance of public functions.

Also, a collection of papers entitled "Two Decades of Public Administration Reform in

BiH - (Un)Learned Lessons" has been published, which focuses on the analysis of public administration reform in BiH in the last 20 years and provides certain guidelines for reforms in the coming period.

Furthermore, when it comes to efforts to improve the area of appointment and exercise of public functions in the public sector without undue influence, TI BiH continued to work on the identification and reporting of potential cases of conflict of interest in Bosnia and Herzegovina in 2024, while undertaking legal and advocacy

activities to strengthen the integrity of public institutions.

As a result of earlier activities, in February, the Commission for Deciding on Conflict of Interest of BiH sanctioned Draško Milinović, director of RAK BiH, and at the same session, proceedings were initiated against Minister Sevlid Hurtić and the director of BH Telecom, Amel Kovačević. The new Law on the Prevention of Conflict of Interest in Institutions at the BiH level was adopted in March, and as its implementation has been postponed for six months, and the process of selecting a new commission has not been discussed to date, no new cases have been discussed at the BiH level.

Given that the commission that would decide on the conflict of interest at the level of the FBiH has not yet been formed, TI BiH has addressed various bodies in this entity and asked for actions in the direction of resolving the incompatibility of functions. This is how YOU BiH addressed:

- Legislative and Legal Committee, the Committee on Justice and General Administration, and the Committee for European Integration of the Parliament of the FBiH, presenting data indicating a conflict of interest regarding Ram Isak, the Federal Minister of Police. According to the available information, the company "CONDOR" d.o.o. Zenica, owned by Rama Isak's wife, concluded

contracts with public authorities in the amount of more than 5,000 BAM in 2023. At that time, the director of the company was his son.

- to the Ethics Commission of the Parliament of the FBiH for the purpose of verifying and further acting on issues of conflict of interest. According to available information, the City of Cazin has concluded public procurement contracts with the company "Voće-Durić doo Cazin", whose founder is Irfan Durić, an elected member of the House of Representatives of the Parliament
- To the Government of the FBiH and JP National Park "Una" with information indicating an obvious conflict of interest regarding the appointment of Alen Zulić, a councilor in the City Council of Bihać, to the position of acting director of this public company.

Earlier, TI BiH reported Amela Mehmedovic, a councilor in the Municipal Council of Živinice, to the Cantonal Administrative Inspection for spending half of her mandate as an assistant minister in the Tuzla Canton Government, which represents a conflict of interest. The Central Election Commission, which has the authority to revoke mandates in such cases, refused to react, citing the Law on Civil Service of the Canton as the basis.

TI BiH then sent a report to the Ministry of Justice and Administration of the Canton of Canton, but the inspection also refused to react, although it is obvious that Mehmedović was not allowed to perform two functions at the same time without approval, which could not be issued. The disciplinary proceedings initiated by the Ministry of Culture, Sports and Youth of the Canton of Canton against Mehmedović have been suspended, because the report of TI BiH arrived with a delay, which enabled it to continue performing both functions.

Due to the suspicion that the then Minister of Culture, Sports and Youth of the Canton of Canton, Ivana Mijatović, knowingly failed to submit the report on time, which enabled Mehmedović to benefit, the TI BiH filed a criminal complaint against Mijatović, for abuse of official position.

These examples illustrate the way in which, due to intertwined legal solutions that treat one area at several levels, as well as due to the lack of a competent body for determining and sanctioning conflicts of interest, legal confusion is created in this BH entity that prevents the application of the law and gives institutions room to avoid jurisdiction. As a result, the area of conflict of interest and the phenomenon of performing multiple functions in the Federation of BiH remains unregulated and without sanctions.

When it comes to Republika Srpska, in addition to the reports sent to the

Commission for Conflict of Interest, TI BiH has also initiated several administrative disputes before the competent courts. Among the most significant cases are earlier charges against Ranko Bošnjak and Slobodan Župljanin for simultaneously performing incompatible functions, where the competent Commission did not establish a conflict of interest in either case.

After that, TI BiH initiated administrative disputes, believing that the decisions were made on the basis of incomplete verifications. In addition, TI BiH has previously initiated proceedings against Milan Tegeltija, an advisor to the President of Republika Srpska, for running FC Borac Banja Luka, which is financed from the budget. After the annulment of the initial decision to discontinue the proceedings, the Commission refused to conduct a retrial, and the final decision on the case is likely to be made by the District Court in Banja Luka.

In addition, TI BiH regularly informed the Commission for Conflict of Interest about potential cases of conflict of interest. Thus, one of the cases relates to the appointment of Jelena Jaćimović Janjetović as a member of the Supervisory Board of the Utility Company "Komunalno" a.d. Kostajnica. She is the spouse of the Mayor of the Municipality of Kostajnica, Nikola Janjetović, which creates incompatibilities according to the Law, because elected representatives and their family members cannot be members of the supervisory board of public

companies while performing public functions.

Also, TI BiH has initiated activities related to the development of models and proposals for improving the functionality of public administration. The model provides for a detailed analysis of the canton's competencies, an analysis of resources at the cantonal level, as well as recommendations for process improvement and management optimization.

With that in mind, in 2024. The Concept for the Functional Review and Reorganization of Public Administration in BiH, as well as the Overview of the Legislative Framework of Public Administration of Zenica-Dboj Canton, were developed, which serve as a starting point for the development of models and proposals for improving the functionality of public administration.

In addition, TI BiH has also acted in the direction of improving the legal framework,

EQUAL ACCESS FOR ALL LEGITIMATE ACTORS IN THE DECISION-MAKING

PROCESS

Throughout the year, TI BiH, in cooperation with CSOs gathered in the coalition Initiative for Monitoring European Integration of BiH, advocated the establishment of an inclusive mechanism for the participation of civil society in BiH's accession negotiations with the EU.

through advocacy for the improvement of the Law on Civil Service of BiH. TI BiH participated in the public debate regarding the amendments to this Law, and created and sent amendments that further specify the purpose of establishing the register in such a way as to specify that the Register of Employees is used to manage personnel who are employed in the institutions of BiH.

TI BiH also pointed out the harmfulness of the Proposal of the Law on Amendments to the Law on Civil Service of Tuzla Canton

Comments and suggestions on amendments to the Law were sent to the Government of Tuzla Canton, with special emphasis on the amendment that envisages the presentation of personal views and opinions and other information through social networks and other media as a disciplinary offense, which causes damage to the reputation of civil service bodies, which could have consequences for persons who report corruption.

Institutions such as the Directorate for European Integration, the Directorate for Economic Planning and the EU Delegation to BiH have recognized the efforts of TI BiH to contribute to this process, and have included representatives of TI BiH in forums on civil society participation in negotiations, such as the Enlargement Candidate Members Initiative, a group of experts from

civil society of candidate countries who will participate in the work of the European Economic and Social Committee. Through trainings on advocacy and communication in the process of accession negotiations, TI BiH contributed to strengthening the capacities of civil society.

In order to raise citizens' awareness of the EU integration process and clarify the meaning of the process, TI BiH started the campaign through five short video materials in which key terms important for the EU integration process and the opening of EU accession negotiations are explained in a simple way. The campaign is carried out through social networks.

In this regard, during the past year, TI BiH has prepared two analyses, the Analysis of the Draft Integration Programme and the Regional Comparative Analysis, which gives an overview of the process of preparation of the Draft Integration Programme of BiH and provides an overview of the practices of the countries in the region that have gone through this process in the previous period, and the analysis entitled "The EU Integration Coordination System in the Context of Competencies in BiH – How to Make the System Functional?" which analyses the roles of different levels of government in BiH in the EU process Integration, i.e. the participation of institutions from different levels of government in the work of the Working Groups for European Integration, which represent operational bodies in the

coordination system. The analyses were presented at the conference at the end of November 2024 and specific recommendations were given on how to improve the current situation.

TI BiH has sent 20 initiatives to governments and parliaments at all levels of government in BiH with the aim of improving the transparency of the decision-making process. The results of the initiative are that the SBK Assembly has created a completely new Assembly website with the aim of improving transparency, the FBiH Government has reached the conclusion that the adopted minutes and laws from the sessions of the FBiH Government will be published, two committees in the FBiH Parliament have made decisions to publish all materials for their sessions, the General Secretariat of the Council of Ministers has launched an initiative to improve the Rules of Procedure of the Council of Ministers that would improve transparency, then the BPK Assembly initiated activities to improve transparency and publish materials for sessions, etc.

In addition, TI BiH has worked on improving the capacity of institutions to improve transparency in their work, and in this regard, trainings for representatives of governments and parliaments have been organized with the aim of improving proactive transparency. Participants improved their knowledge when it comes to the need to improve transparency in work.

In cooperation with the organization Vas prava BiH, TI BiH has developed a methodology for researching the current situation in the field of access to information at all levels in BiH. A total of 374 requests for access to information were sent to the institutions, in accordance with the methodology. Based on the collected data, an analysis was made and published, which, in addition to statistical data on the implementation of the law at all levels, also includes an analysis of the complete legal framework and its compliance with international standards, an analysis of the activities of the Institution of Human Rights Ombudsman in the field of the right of access to information, the work of inspections, as well as an analysis of case law based on cases conducted by TI BiH. The report was published as part of the International Freedom of Information Day.

With that, in 2024. Over the years, TI BiH and Your Rights BiH have been working on the development of online tools for the automatic generation of requests for free

access to information. This tool should provide citizens, journalists, activists and representatives of CSOs with a simple process of creating a request for access to information, its automatic generation, as well as a channel for requesting legal aid from TI BiH or your rights. The online tool is in the final stages of development, and its promotion is planned for January 2025. Year.

TI BiH has also acted in the direction of improving the legal framework to ensure the right of access to information, and the **Law on Freedom of Access to Information of the Brčko District**, and has sought to participate in the process of creating a new law in BD.

He sent suggestions and comments to the Working Group for the development of the ZOSPI BD, with a special focus on the key shortcomings of the Draft, which in fact represents an identical law as the newly adopted ZOSPI BiH.

LAW ENFORCEMENT AND SANCTIONING

LAW ENFORCEMENT AGENCIES ARE INDEPENDENT AND HAVE THE CAPACITY AND WILLINGNESS TO ACT

From the monitoring of public companies, public institutions and concessions, 21 lawsuits and one request for extraordinary review of court decisions have emerged. 13 verdicts were passed, of which 12 were in favor of TI BiH, while one was negative.

As part of the cooperation with TI Czech Republic, during 2024. A comparative analysis was prepared to analyze the new Law on the Prevention of Money Laundering and Financing of Terrorist Activities of BiH and its compliance with the legislation of the Czech Republic. In addition

to the presentation of the analysis, a training was held for the media and civil society on the importance of AML legislation, especially in the part concerning the register of beneficial owners and the register of politically exposed persons, and experiences from the Czech Republic were transferred when it comes to the establishment and use of this information. TI BiH continued to advocate for the establishment of a register of beneficial owners in BiH in accordance with international standards and practices.

THE JUDICIARY IS INDEPENDENT AND HAS THE CAPACITY AND WILL TO ACT

The Tuzla Cantonal Prosecutor's Office has issued an order to suspend the investigation against the former management of the Kreka Tuzla Mine, which distributed jobs worth almost a million KM to the companies Junuzović-Kopex, MHI KOMPANI and Cayenne company without a tender.

Transparency International in BiH filed a criminal complaint over this case back in 2019, because there is a basis for suspicion that the mine managers avoided public tendering for the job of renting mining

machinery and awarded it to these companies by concluding as many as 149 direct agreements.

What is particularly disputable is that the prosecutor in charge of this case did not submit the prosecutor's decision to TI BiH for a year, which he was obliged to deliver to the applicant within three days. By doing so, it denied the applicant the opportunity to lodge a complaint, and the decision was delivered only after several inquiries and a complaint by TI BiH due to the failure to provide information. After all, TI BiH filed a

complaint with the Office of the Disciplinary Prosecutor of the High Judicial and Prosecutorial Council.

TI BiH also filed a complaint against the prosecutor's decision to the Chief Prosecutor of the Cantonal Prosecutor's Office of the Cantonal Prosecutor's Office, because important facts from the criminal complaint were ignored, and the suspension of the investigation was explained: "It is evident that the suspects acted contrary to the provisions of the Law on Public Procurement and the Rulebook on Public Procurement, but their actions were not contrary to the interests of the service."

The decision of the Cantonal Prosecutor's Office of the Central Bosnia Canton not to conduct an investigation against those responsible for non-payment of concession fees worth over 1.7 million BAM has been annulled by the Federal Prosecutor's Office. The decision followed a complaint by Transparency International in BiH, which reported this case two years ago, but the Prosecutor in charge, and then the Chief Prosecutor of the SBK, decided not to conduct an investigation against the responsible persons in the Cantonal Government who failed to initiate enforcement proceedings. However, the Federal Prosecutor's Office accepted the complaint of TI BiH and ordered that actions be taken with the aim of fully establishing the circumstances and facts in this case.

In the application, TI BiH pointed out that a large number of concessionaires in this canton did not pay their obligations, that some had been shut down in the meantime, and the Ministry of Economy of the SBK did not terminate contracts, while the Ministry of Finance did not initiate procedures for forced collection through the activation of bills of exchange.

From the receipt of the request to the blocking of the accounts of some concessionaires, it took up to nine months, which enabled the concessionaires to avoid paying their obligations, which caused significant damage to the budgets of cantons and municipalities.

TI BiH continued to monitor the work of the judiciary, primarily through the monitoring of corruption prosecution. During 2024, the monitoring of corruption prosecution before courts and prosecutor's offices in BiH was published, which provides detailed data on the prosecution of corruption cases (including special statistics on high-level corruption prosecution according to the definition of the HJPC), and the data on the interactive map of corruption prosecution with data for 2023 were updated. year (www.mapa.ti-bih.org).

During 2024, a survey related to the Judicial Transparency Index in BiH was conducted, which was done in cooperation with BIRN BiH, and the presentation of the results for 2024 is scheduled for the first quarter of 2025.

In addition, the reactions of the BiH judiciary to the most complex forms of crime, especially high corruption, in the period from 2021 to 2023 were analyzed and presented in the analysis "[Quality and efficiency of prosecuting high corruption in Bosnia and Herzegovina](#)". The analysis of the efficiency of corruption prosecution shows poor results of the BiH judiciary, primarily due to the extremely small number of cases filed in this category, which was reflected in the number of

investigations initiated and indictments issued.

As solutions that could improve the quality and efficiency of the prosecution of high corruption, legislative and practical measures aimed at strengthening the personnel and institutional capacities of the judicial system have been proposed, with particular emphasis on the integrity, independence and expertise of judicial holders, and the creation of adequate conditions for effective work on these cases.

CONFERENCE "JOURNALISTS AS PARTNERS IN FIGHT AGAINST CORRUPTION"

During the year 2024. In 2010, I was active in the field of advocacy for the harmonization of legislation with international standards. In this regard, TI BiH participated and organized several events related to the drafting of the new Law on the High Judicial and Prosecutorial Council of BiH, organized a series of meetings with representatives of the judicial community, and submitted specific proposals and comments on the text of the law prepared by the Working Group for the drafting of the new Law.

Also, TI BiH held a meeting with representatives of the Venice Commission, which analyzed the Draft Law on the HJPC and presented its views on the new law, where some of the objections were found in the official Opinion of the Venice

Commission. In addition, TI BiH continued with constant monitoring of HJPC sessions in order to be informed about the most important developments in the judiciary, which facilitated the preparation of comments and proposals on the new law on the HJPC.

In addition, TI BiH participated in the consultations on the new law organized by the OSCE Mission, then in the public consultations organized by the Ministry of Justice of BiH, where key objections to the text of the law were presented, and comments and suggestions for improvement were presented. TI BiH also organized a round table in cooperation with the Joint Coordination Body of the Association of Judges and Prosecutors in BiH, where certain provisions of the law

were discussed in detail, and concrete proposals were given for improving the quality of the legal solution.

The key objections of TI BiH from the beginning of the process were the lack of transparency and involvement of all relevant actors in the process of creating draft laws, then recognizing the direct impact of politics on the process of electing council members through the so-called regionalization, but also inadequate provisions regarding the conflict of interest of council members, incompatible affairs of judicial office holders, the scope of relatives for whom property is declared, the level of transparency of data from asset declarations, as well as an inadequate basis for the exchange of data necessary for the exchange of information for the verification of asset declarations, which makes the entire process meaningless.

Along with the activities related to the preparation of the new Law on the HJPC, TI BiH has prepared and sent an initiative to the HJPC for the proactive publication of statistical data on the prosecution of corruption in BiH. The initiative proposes

the publication of statistical data on the prosecution of corrupt crimes on the HJPC website, and the publication of more detailed data in a machine-readable format.

After years of obstruction, the Law on the Prevention of Conflict of Interest in Institutions at the Level of Bosnia and Herzegovina was adopted on March 8, 2024 in the Parliamentary Assembly of BiH.

TI BiH warned that important provisions of the law were changed at the last minute, but also that the process of adopting the law went beyond elementary international standards such as conducting consultations, drafting regulatory impact assessments and basic transparency of the process through non-institutional arrangements.

TI BiH actively participated in the process of drafting the new Anti-Corruption Strategy of BiH for the period 2024-2028 and the related Action Plan through participation in the work of the Working Group for the development of the strategy, as well as through the preparation and sending of comments and proposals during public consultations.

DEFENDING CIVIL SOCIETY AND PROMOTING INTEGRITY

PROMOTING VALUES BASED ON INTEGRITY

In April 2024. The new National Integrity System (NIS) 2023 Study was presented and promoted, where the key findings of the study were presented and further promoted through social media. The conference brought together a large number of representatives of the international community, domestic institutions, media and civil society.

Furthermore, representatives of TI BiH presented the regional NIS report at the IACC conference held in Villinus, Lithuania, as well as at the regional OGP meeting held in Tirana, Albania.

The geopolitical forum "EU Enlargement in the Era of Geopolitics" was held, with guests from the Carnegie Foundation and local experts on the topic of merits within the EU integration process in the light of the latest geopolitical events.

In accordance with the previously jointly developed training plan of the Public Procurement Agency, TI BiH, in cooperation with the E-Government team, organized a training for employees of the Public Procurement Agency on the topic: "*Strategic Aspects of Public Procurement with a Focus on Innovative Solutions - Innovation Partnership*

Procedure", which aims to improve the knowledge and skills of participants on the strategic approach to public procurement and the application of innovative procedures in practice.

In order to strengthen the capacities of governments and parliaments in BiH in the field of proactive transparency and openness of institutions, TI BiH organized two trainings where participants had the opportunity to improve their knowledge in the field of proactive transparency and openness of public institutions.

The trainings were attended by representatives of the General Secretariat of the Council of Ministers of BiH, the Assembly of the Bosnian-Podrinje Canton, the Government of Zenica-Doboj Canton, the Assembly of the Sarajevo Canton, the Government of the Federation of BiH, the Parliament of the Federation of BiH, the Assembly of the Herzegovina-Neretva Canton, the Assembly of the Una-Sana Canton, the Assembly of the Central Bosnia Canton, the Government of the Central Bosnia Canton, the Assembly of Canton 10 (Livno), and the Government of Canton 10 (Livno).

ACTIVISTS, WHISTLEBLOWERS AND JOURNALISTS ARE FREE, TRAINED AND PROTECTED TO ACT AGAINST ABUSES

In the period January-November 2024, 365 cases were handled within the Center for Legal Assistance in the Fight against Corruption.

In the same period, there were 1,227 calls to the toll-free hotline for reporting corruption cases.

Acting on the complaints of citizens, several criminal charges have been filed, which include:

- Criminal charges filed with the Tuzla Canton Prosecutor's Office against the Minister of Culture, Sports and Youth of Tuzla Canton, Ivana Mijatovic, because she knowingly failed to submit a disciplinary report against an employee of the Ministry within the prescribed deadline, which is why it is time-barred.
- Criminal charges against the members of the Board of Directors of the Public Institution Health Center with Inpatient Caregiver Olovo because there are grounds for suspicion that they committed the criminal offense of Abuse of Position or Authority under Article 383 of the Law on Criminal Procedure as official and responsible persons (appointed persons) of the Criminal Code of the

Federation of BiH and Negligent Work in the Service referred to in Article 387 of the Criminal Code of the Federation of Bosnia and Herzegovina.

- Criminal charges against the Minister of Culture, Sports and Youth of Tuzla Canton, because there are grounds for suspicion that, as an official and responsible person, he committed the criminal offense of Abuse of Position or Authority under Article 383 of the Criminal Code of the Republic of Croatia. By failing to perform his official duties, which are reflected in the obligation to initiate disciplinary proceedings against an official in the ministry who violated the law, he obtained a benefit for that official.

In one of the cases from the previous period, the Federal Prosecutor's Office of the Federation of BiH accepted the complaint of Transparency International in BiH and annulled the order not to conduct an investigation in the case of rigging a vacancy at the Oriental Institute of the University of Sarajevo.

In this case, TI BiH filed a criminal complaint back in 2019 because this Institute conducted a public competition for the

admission of librarians in such a way that it "secretly" selected the best candidate, while the other candidates were not informed about the selection for a full nine months, which deprived them of the right to file a complaint.

In the mentioned period, *29 administrative disputes* were initiated before the competent courts in connection with free access to information, and *15 judgments were issued* on lawsuits from the previous period. In *11* judgments, the claims of TI BiH were adopted, and the decisions of the competent institutions were annulled, while in *4* judgments, the requests for extraordinary review of court decisions were rejected.

Four appeals *were filed* with the Constitutional Court, one of which was dismissed. The Constitutional Court of BiH accepted one appeal filed in 2023 and found a violation of the right to a trial within a reasonable time. Four *lawsuits have been filed for the parties*, of which 2 have been accepted and 2 are in the process of being decided.

On the basis of the petitions of the TI BiH related to human rights violations, the Institution of Human Rights Ombudsman made 4 recommendations:

- The Ombudsmen instructed the Board of Directors of *the Public Institution "Health Center with Inpatient Care" Olovo* to cease the practice of appointing the acting

director of the institution for periods of 6 months, and to undertake activities for the timely completion of the procedure of selection and final appointment of the director.

- *The Ombudsmen instructed the FBiH Railways Ltd. Sarajevo* to harmonize their actions with the findings of the Recommendation and eliminate discriminatory treatment of certain categories of persons. TI BiH turned to the Ombudsperson Institution because the said company did not announce public announcements for professional training for independent work, i.e. passing the professional exam, in accordance with the provisions of the Rulebook, while in public announcements for employment it required candidates to have passed the professional exam.
- *A recommendation was sent to the Ministry of Administration and Local Self-Government of the Republic of Srpska* because, acting upon the request, the TI BiH submitted an incomplete decision, without the necessary signature and seal, which prevented further legal protection.
- *The Ombudsperson sent a recommendation to the Mayor of the City of Mostar* for refusing to cooperate with this institution. Regarding the petition of TI BiH, the

Ombudsmen addressed the Mayor of the City of Mostar, requesting a statement on the allegations in the petition that the new Rulebook on Real Estate Records prescribes that the real estate records are not a public register, and that the data from the records are considered a business secret.

The Capital portal revealed that the Government of Republika Srpska signed a secret contract with the company ELINC from China, which is linked to the military industry, worth as much as 57 million KM for the procurement of digital protection software in all institutions of Srpska.

The contract with the Chinese, it was confirmed for CAPITAL from several credible sources, was signed at the beginning of June this year, and after that it was marked with secrecy, in order to hide from the public another spending of tens of millions of KM on software, as well as its purpose. It is planned that this software will be implemented in all institutions in Srpska for a period of ten years, and ELINC won the job on the basis of a previous agreement behind closed doors, without a tender and without informing the citizens from whose pockets all this will be paid.

All this was agreed by the RS Government at its session in mid-May, under the "miscellaneous item" and avoided informing the public about it and announcing a public call, using the possibilities of the amended Law on Public Procurement of BiH to hide the spending of tens of millions of KM from citizens. That is why TI BiH provided assistance to Capital journalists in exercising their right of access to information, which, after an exhaustive procedure, resulted in the initiation of an administrative dispute.

At the invitation of the locals and activists from Livno gathered in the informal group "Let's Protect the Springs of Mandek" who are fighting against the concession for water exploitation, several meetings were held with them, with the Minister of Economy of the Canton, the Cantonal Prosecutor, and consultations were held with a lawyer and a procedure for determining the nullity of the contract before the competent court is being prepared.

Based on the support of TI BiH and consultations with all city councilors, the City Council withdrew the previously given conditional consent for the concession.

PROTECTING THE RIGHTS OF JOURNALISTS AND ACTIVISTS

In order to reduce the consequences of criminalization of defamation, TI BiH has

been working on educating journalists and activists in terms of protection from

criminal prosecution for defamation and rights in criminal proceedings.

Within this component, TI BiH has developed a Handbook for journalists and activists on how to protect their rights after the amendments to the Criminal Code.¹

In order to provide legal assistance to journalists and activists, TI BiH has established internal legal aid procedures, established a network of lawyers to support and represent them as needed (from Banja Luka, Sarajevo, Bijeljina and Trebinje), launched and promoted its contact points, including an emergency hotline.

In order to further educate activists and journalists on the protection of their rights and provide practical guidance, training programs were developed and 5 trainings were held throughout the country. During

DEFENDING THE CIVIC SPACE

A large part of TI BiH's efforts during 2024 was related to advocacy for the defense of civic space, which implied not only helping NGOs, media and journalists/activities to protect their rights, but also advocating against the adoption of harmful legal solutions, such as the Law on Labor Publicity and the RS Register of Non-Profit Organizations (the so-called "Law on Foreign Agents").

the trainings, representatives of TI BiH presented and promoted contact points for seeking legal aid, and presented various aspects of legal aid, and contacts were also promoted through Manuals.

The total number of participants in the training was about 90. In addition to the trainings, the manuals were also distributed directly by mail to organizations and the media.

TI BiH has also established other forms of administrative and legal support to CSOs, by helping organizations to register at another administrative level, in order to potentially avoid harmful consequences if the Law on NGOs RS is adopted. I'd like to hire a lawyer and help with the registration of 3 organizations.

TI BiH has initiated activities on various fronts: informing international and domestic actors about harmful content and appealing to all organizations to act against its adoption, letters, press releases, meetings, press statements, coordination with CSOs and the media in RS in the direction of joint action. and advocacy, public campaign against the adoption of

¹ <https://ti-bih.org/wp-content/uploads/2024/02/TI-BIH-PRIRUCNIK-WEB-3.pdf>

laws, production of media content, media releases, etc.

TI BiH has managed to attract international attention to this issue, and based on the letter it sent to the EU institutions, members of the European Parliament, international organizations, embassies, as well as the meetings held, numerous reactions of international actors have been published calling on the RS authorities to stop adopting the law (EESC, several MEPs, UN rapporteurs, Transparency International, international human rights organizations, etc.)

TI BiH also coordinated with other civil society organizations the development of analyses of the proposed provisions, the development of initiatives towards institutions and participation in the / boycott of public debates on the draft law.

TI BiH legally (through requests and lawsuits) demanded action from the RS Government regarding the lack of transparency and procedures in the process of adopting the draft law.

Even after the withdrawal of the draft law from the procedure, TI BiH continued its work to raise awareness of relevant actors about the dangers of this law at the national and international level in order to lay the foundations for preventing further announced initiatives.

This included participation in international events as speakers and exchange of

experiences from Bosnia and Herzegovina, including but not limited to: panels at two workshops in Geneva at the UN Human Rights Council, three international workshops on the protection of civic space organized by the World Movement for Democracy, organization of an international thematic workshop on legislation related to foreign agents, meetings with the EU and other international officials in Brussels, Bosnia and Herzegovina, etc.

In addition to advocacy, TI BiH also coordinated the communication approach of civil society with the aim of eliminating negative or mitigating reputational consequences, given the negative campaign conducted by the authorities against civil society.

This included trainings for CSOs regarding communication approaches, then the engagement of communication experts and the creation of a communication strategy for CSOs, and the organization of practical workshops with the aim of creating content, after which TI BiH coordinated the creation and publication of creative and media content related to the Law.

One of the approaches involved establishing cooperation with well-known public figures from the country and the region, who influence the citizens of BiH, to engage them in messages against the law. Meetings and consultations were held with the Proclamation from Serbia (bringing together prominent personalities from

various sectors, including actors, professors, judges, etc.). As part of this collaboration, they developed a series of videos explaining the harmful impact of the Law on fundamental freedoms. The recordings and their statements were jointly distributed by TI BiH, other organizations within the core group, media partners, etc. As part of this coordination, press releases were made by various organizations from the region, including Civic Initiatives and 11 other organizations from Serbia.

Cooperation was also established with other public figures, in order to spread the message to the satirical side, including Zoran Šprajc from Croatia, while TI BiH published infographics and videos with contradictory statements about international support, which was re-actualized by other actors, including the distribution of over almost 50 Facebook groups.

The whole concept of the communication approach before the assembly sessions was based on organic content production and reaching out to audiences that do not normally follow the work of NGOs. In this regard, cooperation has been established with media and authors from all over the region on the development of articles on this topic.

In addition to dealing with the law on foreign agents, TI BiH and other members

of its core group have begun to produce content that shows the relevance of the work of CSOs, from the point of view of the users of their services.

TI BiH has created a video showing the testimonies of citizens who have received legal aid from TI BiH in the past. The video (<https://www.facebook.com/TIBiH/videos/406943148843598>) has garnered 500,000 views on Facebook and 50,000 views on YouTube. Other types of content were created to show the diversity of the NGO's work, together with partner organizations - TI BiH, in cooperation with other civil society organizations, created 8 different videos/testimonies that show the support that CSOs provide to citizens and various groups that fight for their rights.

One of the most important results of the communication approach was a documentary film about the suppression of civil liberties in Republika Srpska (*Enemies of the State*) - which shows the events of the past 15 years that culminated in the form of draft laws, from the point of view of different actors, those from the point of view of governments and those who were under attack from the authorities, where the goal is to show the true intentions behind these initiatives. The documentary will be published and promoted in the coming period.

CITIZENS ARE EMPOWERED TO DEMAND ACCOUNTABILITY

TI BiH has prepared an analysis "[*The Rule of Silence: Challenges and Perspectives of Whistleblowing in BiH*](#)", which provides an overview of the situation of whistleblowers in Bosnia and Herzegovina and tries to answer the question why whistleblowing in the public and private sectors is still a rare occurrence, despite the general belief of citizens, business, academia and civil society organizations that corruption is a widespread problem in BiH. Based on the available data and a brief analysis of the legal and institutional framework for the protection of whistleblowers, obstacles that hinder this practice have been identified.

Over the past year, TI BiH has conducted a campaign that included over 10

representatives of the media, civil society and cultural representatives who underlined the importance of the publication of information and public documents by the executive and legislative authorities.

The campaign called for improved transparency of the decision-making process by public institutions and was carried out through social media channels. A total of 16 videos have been created and promoted. The campaign on Facebook had a reach of over 356,000 users, while the videos on the YouTube channel have over 339,000 views.

A NEW GENERATION OF LEADERS EMPOWERED TO ACT AGAINST CORRUPTION

During the reporting period, TI BiH continued with the education and networking of young leaders through the TI BiH School of Integrity. In 2024. The eighth generation of the School of Integrity was implemented, and so far a total of about 200 young people from BiH have passed through the school.

The School of Integrity is based on the concept of a system of social integrity that includes key institutions, sectors or "pillars"

that contribute to integrity, transparency and accountability in society. The school combines academic with practical approach, and its goal is to develop and acquire the knowledge and skills needed by young activists, future leaders for successful social engagement and acting in the public interest.

During the year, the implementation of the PressStart educational program was completed, which helped future journalists

and activists to launch new independent media (five portals and podcasts). Educational workshops and trainings were led by experienced journalists in the field of investigative journalism, experts in the field of digital marketing, editing and others to give participants the opportunity to learn the basics of investigative journalism, as well as several mentoring sessions that were designed to facilitate the creation of a sustainable media strategy for future media outlets.

In addition, in February, two-day workshops were organized for students and journalists (60 participants) where they had the opportunity to get acquainted with the basic concepts in the fight against corruption and investigative journalism, with a focus on the connection between corruption, conflict and the rule of law.

In parallel, TI BiH promoted the study "*Captured State and Society – The Case of Bosnia and Herzegovina*", which analyzes the connection between corruption, exclusion and conflict and offers concrete recommendations for increasing inclusiveness and reducing the risk of conflict. The findings of the research were previously presented at a conference that brought together 65 key actors from domestic and international institutions.

In cooperation with the USAID project "E-Government", TI BiH organized a training for civil society organizations on monitoring public procurement with the use of new

digital tools developed to improve transparency and efficiency in spending public funds, where participants had the opportunity to get acquainted with the results of the E-Government project and the latest achievements in the field.

Also, the newly joined organizations received basic training on public procurement during the event.

In addition, when it comes to the dissemination of information on the systems developed within the E-Government project, TI BiH has developed a manual for CSOs on data collection, analysis and dissemination. The manual includes all the functionalities and processes from which CSOs can extract data or request their submission from the competent institutions.

This document serves as a guide for civil society organizations in collecting, analyzing, and sharing information from the developed system, with the aim of increasing transparency and accountability.

During the year 2024. In 2010, TI BiH launched a new initiative called "Policy Lab for Good Governance". This initiative serves as a collaborative platform for young researchers and public policy practitioners in BiH, fostering an innovative, inclusive and evidence-based approach to addressing key governance challenges.

The areas and topics addressed by the Policy Lab are: transparency and

accountability, anti-corruption strategies, public sector reform, rule of law, public policies and service delivery, sustainable development and governance, institutional capacities and human resources, etc. In this

regard, a public call for researchers was published in November, while a public presentation of the Policy Lab for Good Governance is planned for December.

ADDITIONAL INDICATORS

In 2024, TI BiH continued to make significant progress in the field of communications and media presence.

MEDIA PRESENCE:

Based on the activities of TI BiH, 5150 media publications were placed from the beginning of the year to November 1, 2024, of which 4620 articles were in the digital space or online portals, while 354 articles and 184 articles in print media were published on televisions covering the territory of BiH.

Although the Internet and online media represent the primary channel of media communication in the world and the market of Bosnia and Herzegovina, traditional media are of particular importance, among which television still has the strongest influence, especially by the degree of trust that this type of media enjoys with the audience as a source of information, which is higher than in other media, which is confirmed by many² researches.

In this regard, it is important to point out that the activities and findings of TI BiH in 2024 by November recorded a total of 1379 minutes of broadcast TV on some of the

most watched television channels in Bosnia and Herzegovina, thus strengthening not only the media presence of the organization, but also acting on the spread of awareness and influence on public opinion in general about the harmfulness of corruption as a phenomenon, but also about its specific phenomena and social circumstances that favor it and the problems that They're coming out of her.

Television	Minutes	Announcements
<i>Radio Television of the Federation of Bosnia and Herzegovina</i>	305	62
<i>Radio Television of Bosnia and Herzegovina</i>	197	50
<i>N1 television (BiH)</i>	196	50
<i>Radio Television BN</i>	181	52
<i>Nova BH</i>	132	34
<i>Al Jazeera</i>	98	29
<i>About the channel</i>	62	19
<i>Face TV</i>	62	10
<i>TV OBN</i>	54	21
<i>NTV Hayat</i>	43	12

² *Polarized Public Trust in the Media and Social Networks in Bosnia and Herzegovina, Anida Sokol, Publisher: Mediacentar Sarajevo Foundation, SEENPM, Tirana and the Peace Institute, Ljubljana, 2021*

https://www.media.ba/sites/default/files/resilience-research-publication-3-bih-bhs_0.pdf

<i>Sri Lanka Television</i>	26	9
<i>UNA TV</i>	12	4
<i>TV ALFA</i>	11	2
TOTAL	1379	354

A total of 91 articles were published on the websites of TI BiH and Transparentno.ba, of

which 54 were published on the website ti-bih.org while 37 articles of investigative journalism were published on the Transparentno.ba portal. During this period, Transparency International sent out 26 official press releases.

Online portals 4620

<i>Antikorupcija.info</i>	140
<i>Rtvbn.com</i>	98
<i>Jajce-online.com</i>	90
<i>Slobodna-bosna.ba</i>	88
<i>Impulportal.net</i>	84
<i>N1info.ba</i>	80
<i>Istokrs.com</i>	80
<i>Oslobodjenje.ba</i>	79
<i>Fokus.ba</i>	76
<i>Federalna.ba</i>	72
<i>Inforadar.ba</i>	71
<i>Etto.ba</i>	67
<i>Crna-hronika.info</i>	63
<i>Direkt-portal.com</i>	63
<i>Hercegovina.info</i>	62
<i>Valterportal.ba</i>	62
<i>Gerila.info</i>	61
<i>Bosnainfo.ba</i>	57
<i>Capital.ba</i>	57
<i>072info.com</i>	56
<i>Srpskainfo.com</i>	55
<i>Bljesak.info</i>	53
<i>Interview.ba</i>	49
<i>Akta.ba</i>	48
<i>Infoveza.com</i>	47
<i>6yka.com</i>	46
<i>Bhrt.ba</i>	46
<i>Avaz.ba</i>	45
<i>Dnevni.ba</i>	44

Television 354

<i>FBiH Radio Television</i>	62
<i>Radio Television BN</i>	52
<i>N1 television (BiH)</i>	50
<i>Radio Television of Bosnia and Herzegovina</i>	50
<i>Nova BH</i>	34
<i>Al Jazeera</i>	29
<i>TV OBN</i>	21
<i>About the channel</i>	19
<i>NTV Hayat</i>	12
<i>Face TV</i>	10
<i>Sri Lanka Television</i>	9
<i>UNA TV</i>	4
<i>TV ALFA</i>	2
<i>Telugu</i>	184
<i>Daily newspaper</i>	69
<i>Liberation</i>	45
<i>The Daily Awake</i>	28
<i>The Independent Newspaper</i>	15
<i>Euro Blic</i>	12
<i>Večernji list</i>	6
<i>Una-Sana Newspaper</i>	3
<i>Business News</i>	3
<i>The Daily Mail - Panorama of the Week</i>	1
<i>Banks</i>	1
<i>Večernje novosti - Republic of Srpska</i>	1

Ljubuski.net 43
Others 2638

SOCIAL NETWORKS:

- Facebook: 115 posts were recorded with 3,009,578 users reached.
- Instagram: 108 posts were recorded with 151,663 users reached.
- Twitter: 269 posts with 103.6 thousand impressions and 5141 comments and other engagement.
- LinkedIn: There were 4,866 impressions on posts on this network.
- YouTube: The channel TI BiH achieved 1,311,670 views and 15.5 thousand hours of viewed content, while the channel of the podcast Pretres recorded 53,752 views of 4.8 thousand hours of viewed content.

WEBSITES AND DATABASES:

The TI BiH website has recorded 178,948 views based on 75,051 users. The portal Transparentno.ba where investigative journalism texts are published was visited by 49,122 people, achieving 80,869 views. Databases created with the aim of monitoring and spotting irregularities in the process of distribution of public funds are very popular, primarily due to the diversity of data, but also due to the fact that many of the offered data and information do not exist in any public and official register active in Bosnia and Herzegovina (so, for example, there is no official data on active public companies in BiH).

In this way, these services become a kind of source for all researchers, editors, academics and representatives of public institutions and decision-makers to access a

lot of information about the work in the functioning of the public sector in Bosnia and Herzegovina.

Registrar	No Reviews
<i>Database of Public Enterprises</i>	10,619
<i>Register of Officials</i>	17,512
<i>Register of Concessions</i>	16,200
<i>Register of Institutions</i>	29,585
<i>Grant Award Register</i>	15,277

Significant attendance was also recorded by other projects such as **Report Corruption** 14,287, **AcMonitor** 151, **Judiciary Index** 2,520, **Corruption Prosecution Map** 2,253.

Projects such as AC Monitor, Judiciary Index, Corruption Assessment Maps, POPULUS Project, Corruption Whistleblowing

Platform, Reflektor, Register of Functions, Concessions and Institutions together recorded 119,477 views and 77,356 visitors.

CREATED CONTENT:

A total of 37 research papers, 26 press releases, 103 graphics (mainly for Instagram and Facebook), 22 Facebook videos, 47 reels for Instagram and

Facebook, and 13 for YouTube were created.

PUBLICATIONS AND ANALYSES

1. [Manual "Protection of the Rights of Journalists and Activists after the Recriminalization of Defamation"](#)
2. [Bosnia and Herzegovina: A Captured State and a Captured Society](#)
3. [Analysis of Employment Policies in Public Enterprises in BiH](#)
4. [Interoperability in Public Procurement in Bosnia and Herzegovina](#)
5. [Dynamic Purchasing System in the Context of Centralized Public Procurement](#)
6. [Study of the National Integrity System Bosnia and Herzegovina 2023](#)
7. [Two Decades of Public Administration Reform in Bosnia and Herzegovina: \(Un\)learned Lessons – Proceedings](#)
8. [The Concession System in Bosnia and Herzegovina: Legal and Institutional Framework](#)
9. [Quality and Efficiency of High Corruption Prosecution in Bosnia and Herzegovina](#)
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