



# **Annual report of activities of TI BiH for 2024**

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## 1. PROTECTION OF PUBLIC RESOURCES

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### *1.1. public contracting competitive, transparent, and open*

Transparency International in Bosnia and Herzegovina (TI BiH) has continued to consistently highlight irregularities in public procurement, pointing out cases that undermine transparency and create opportunities for corruption.

Over the past year, a significant challenge has been the increasing number of public enterprises failing to conduct public procurement procedures. Since JP Sarajevoputevi has ignored the Public Procurement Law for years, TI BiH filed a criminal complaint against this public company in 2019. The Sarajevo Canton Prosecutor's Office decided not to open an investigation, prompting TI BiH to file an appeal against this decision, emphasizing that the lack of accountability for such actions could have long-term consequences.

This issue has become even more pressing as Ceste d.d. Mostar recently made a similar decision to cease conducting public procurement procedures. In response, the management of JP Ceste d.d. Mostar stated that they are not obligated to carry out public procurement processes, arguing that they operate as a commercial enterprise without a monopoly on the market. TI BiH has warned that such a stance could set a dangerous precedent for other public enterprises, creating opportunities for corruption and the misuse of public funds by bypassing transparent procedures.

In 2024, an order was issued not to open an investigation in the case of RITE Gacko, where TI BiH had filed a criminal complaint back in 2021. RITE Gacko had 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, prompting TI BiH to file an appeal against this decision and submit a complaint against the Chief Prosecutor for failing to provide notification within the legal deadline.

A similar situation occurred at the Kreka Mine in Tuzla, where the management used 149 direct agreements to lease mining equipment, bypassing legal limits. Although an investigation was opened in 2022, it was discontinued a year later with the justification that the law had been violated "in the interest of the service." TI BiH appealed this decision, emphasizing the need for consistent enforcement of the law and accountability in public procurement processes.

Furthermore, TI BiH has highlighted potential conflicts of interest in public procurement, such as the case of the Olympic Center "Jahorina," where a promotion contract was awarded to the Basketball Club "Jahorina." The club's president, Nedeljko Elek, simultaneously serves on the supervisory board of the Olympic Center. This dual role violates the Public Procurement Law, which prohibits individuals in such positions from benefiting from contracts awarded by institutions they oversee.

**TI BiH has continued submitting reports to relevant institutions (27 in total), with most cases being acted upon.** One example is the action of the Public Procurement Agency, which, at the request of TI BiH, monitored the public procurement process for the construction of the Memorial Complex in the City of East Sarajevo. The Agency subsequently filed a complaint with the Special Department for Combating Corruption, Organized, and the Most Severe Forms of

Economic Crime of the Republic Public Prosecutor's Office due to elements of a criminal offense. The violation involved bypassing the Public Procurement Law by allocating funds for the construction to the Veterans' Organization, which then hired the contractor.

Additionally, TI BiH filed a criminal complaint against the Tuzla Canton Police Directorate for irregularities in the procurement of armored transporters worth 5.2 million KM. During the process, the conditions in the tender documentation were altered to favour one bidder. An advance payment of 50% of the total contract value was made before a bank guarantee was provided, contrary to the tender requirements. The vehicles were not delivered within the agreed timeframe, and no protective measures, such as activating the bank guarantee, were taken to safeguard public funds. These irregularities indicate serious violations of legal procedures and potential favouritism toward the selected bidder.

TI BiH continued its activities in the field of natural resource protection in 2024 by updating data in the Concession Register in BiH. This register, established as a response to the lack of transparency in this sector in BiH, provides comprehensive information on the legislative framework, permits, fees, concessionaires, and budget revenues collected from concession fees at all levels of government in BiH.

Previously, data were collected on concessionaires, concession agreements, fee calculation methods, paid obligations, and debts owed by concessionaires to entities, cantons, and local communities up to 2022. In 2024, TI BiH continued updating the register by gathering and updating data on concessions and fees for the year 2023, ensuring ongoing monitoring and transparency in this sector.

TI BiH provided active support to activists and informal citizen groups across BiH in their fight to protect their rights and the environment by preventing the illegal exploitation of natural resources in their communities. **One such case was the support provided to the informal citizen group "Zaštinitimo izvore Mandeka" in their years-long struggle to protect water sources in Livno. After six years of efforts, the Livno City Council canceled the approval for granting a concession for the exploitation and exploration of water at the "Poljane" site.**

TI BiH assisted residents in gathering and analysing key documentation that exposed irregularities in the concession granting process, including the absence of a public debate, missing water permits, and a lack of environmental impact studies. Based on this evidence, residents successfully advocated for a discussion at a City Council session, which led to the withdrawal of approval for the concession.

**This decision represents a significant step toward terminating the concession agreement, ensuring the permanent protection of the Mandek water sources.** The case serves as a model of successful collaboration with grassroots organizations, demonstrating how local communities can advocate for responsible management of natural resources while raising awareness about the importance of transparency and accountability in the concession allocation process.

TI BiH, in collaboration with the Helsinki Citizens' Assembly, organized a public forum titled **"Environment – Management, and Protection of Urban and Rural Areas"**, held on **October 10, 2024, at the Youth Center in Banja Luka**.

The forum brought together experts and activists from Serbia, and Bosnia and Herzegovina to discuss key environmental challenges, including park conservation, the negative impacts of mining in rural areas, and other aspects of sustainable natural resource management.

This event showed a high level of interest and gathered a large number of citizens, demonstrating the **growing public interest** in preserving natural resources and ensuring responsible management of urban and rural areas. It also highlighted the **crucial role of civil society organizations** as key actors ready to support citizens in protecting their rights and raising awareness about **environmental protection** through such initiatives.

TI BiH, in cooperation with the Center for the Environment, **has prepared and submitted a series of amendments to the Draft Law on Amendments to the Law on Geological Research of the Republic of Srpska**. These amendments were sent to the Legislative Committee of the National Assembly of the Republic of Srpska, requesting their inclusion in the Committee's Report and a vote by Members of Parliament at the tenth regular session of the Assembly. Certain provisions of the Draft Law seek to **completely exclude the public and local self-government bodies from the decision-making process**, thereby fully centralizing authority within the Government of the Republic of Srpska. This would bypass **mandatory concession-related procedures and legal frameworks**, jeopardizing established rules for the allocation of public resources.

During 2024, TI BiH continued its efforts to improve the public procurement system in Bosnia and Herzegovina, actively participating in consultations for the development of the **Public Procurement Development Strategy 2024-2028**. The submitted proposals included **a revision of deadlines** in the strategy to enhance process efficiency, emphasizing the need for **stronger enforcement mechanisms** to ensure accountability. Additionally, as part of its comments on the **Anti-Corruption Strategy**, TI BiH proposed the **expansion of the Public Procurement Portal** to include training for investigative bodies, aiming to improve their understanding of public procurement laws and strengthen oversight and the fight against corruption in this sector.

To illustrate trends in the implementation of specific provisions of the **Public Procurement Law**, from the entry into force of its amendments in 2022 until the end of August 2024, **TI BiH published the report "Monitoring the Implementation of the Public Procurement Law for the Period December 2022 – August 2024"**. This analysis evaluates the **effectiveness of the amendments**, focusing on **procurement planning, exemptions from the law, and non-transparent procedures**. The report includes **real-life examples** from six cities and one public enterprise, providing insights into current trends and recommendations for improvement.

Furthermore, regarding advocacy activities, TI BiH, together with the ACT Foundation, organized an **expert discussion titled: "Concession Contracts in BiH – Problems and Opportunities for**

**Legal Improvement”**. This event aimed to enhance the legal framework for concessions in line with EU directives and international commitments, focusing on access to justice in cases concerning the right to a healthy and preserved environment. During the discussion, **TI BiH presented findings from its Analysis of the Concession System in Bosnia and Herzegovina and the unique electronic registry of concession contracts covering the entire country.**

When it comes to **monitoring projects under the Economic and Investment Plan (EIP)**, TI BiH has prepared two case studies on projects funded through the Western Balkans Investment Framework (WBIF): Reconstruction and modernization of the Brčko river port (Phase 1) and Mediterranean Corridor: Railway section Šamac – Doboj – Rječica on Corridor Vc in BiH. **As part of this initiative, on June 5, 2024, in Sarajevo, TI BiH, in collaboration with the Institute for Cooperation and Development of Albania and the Permanent Secretariat of the Transport Community, organized a roundtable discussion titled “Promoting Inclusivity in the Implementation of the Economic and Investment Plan (EIP).”**

The event brought together representatives of international and domestic institutions, civil society organizations (CSOs), and other key stakeholders to highlight the crucial role of CSOs in ensuring transparency, accountability, and inclusivity in infrastructure projects. Special attention was given to the importance of monitoring investments and improving their implementation through collaboration among all involved parties.

Furthermore, regarding **foreign investments, TI BiH**, as part of the regional network of the **Western Balkans China Policy Team**, has developed a **policy memo** dedicated to strengthening **transparency and accountability standards in contracts with Chinese companies**. The memo emphasizes the need for **alignment with international norms and the protection of local community interests**, advocating for clearer **public oversight, environmental safeguards, and responsible investment practices**.

### *1.2. Narrowed space for abuse in the public sector*

To reduce the scope for abuses in the public sector, TI BiH has improved transparency and the availability of key information on the work of public authorities by updating databases that cover business operations, finances, governance, and other important aspects.

[The database of public enterprises](#) contains information on operations, profits, losses, number of employees, and discretionary expenses for 458 public enterprises in BiH. To update the databases, **394 requests for access to information were sent, with over 70% of responses received.** [The database of public institutions](#) includes information on management bodies, salaries of directors and supervisory board members, and budgets for 1,700 public institutions. [The database on the allocation of public funds to associations and foundations](#) provides insight into amounts, criteria, and beneficiaries of grants awarded by public authorities. In 2024, over **14,000 grants awarded to associations and foundations during 2022 and 2023** were entered, significantly increasing the transparency of public resource usage.

At the beginning of 2024, **TI BiH, together with a coalition of non-governmental organizations, launched the so-called "Accountability Platform."** This initiative aims to jointly monitor institutional accountability, public officials, and political parties, support anti-corruption

reforms, and enhance integrity mechanisms by providing relevant proposals, transparent consultations on necessary solutions, and dialogue with key stakeholders. It also seeks to articulate citizens' demands through open discussions with decision-makers. A joint methodology for monitoring corruption risks has been developed, along with an analysis of key aspects of the anti-corruption framework in Bosnia and Herzegovina, presenting existing legal solutions, challenges in their implementation, and identifying key obstacles and recommendations.

Furthermore, regarding political integrity, TI BiH has continued its engagement through participation in regional activities, where analyses of the legislative framework on political integrity have been developed. As part of these activities, data on public procurement, political party financing, and asset declarations of elected officials has been collected. Indicators have been established to highlight risks such as whether political party donors receive public contracts, whether companies owned by public officials win public contracts, whether companies owned by their family members are awarded public contracts, and to what extent public spending increases during election years.

The selection of indicators was preceded by meetings with members of the Domestic Advisory Group (DAG), which includes representatives from institutions, non-governmental organizations, academia, and the media. DAG members also participated in regional and bilateral meetings with counterparts from other countries.

### *1.3 Creation of preconditions for the business sector to operate on the principles of integrity*

Throughout 2024, TI BiH has continuously worked on creating the conditions for the private sector to operate with integrity, supporting those facing unfair competition and non-transparent public procurement procedures. Through legal and procedural assistance to bidders, TI BiH pointed out irregularities, and one of the highlighted cases relates to irregularities in public procurement procedures at the contracting authority Lutrija BiH. TI BiH, following up on this authority after reporting irregularities, determined that the new procedure re-established conditions identical to those that had previously led to the initiation of misdemeanor proceedings. 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 on scheduling a hearing, although the request for misdemeanor proceedings was filed in September 2023.

In addition to support in the area of public procurement, TI BiH has provided legal assistance in other business-related cases. One example is an intervention in Brčko, where a company's request for connection to the water supply network was denied based on reasoning that did not comply with legal regulations. After TI BiH pointed out the irregularities in the actions of the responsible public utility company, the request was approved, enabling the implementation of necessary infrastructure works.

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## **2. SECURE INTEGRITY IN POLITICS**

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## 2.1. Fair elections

To monitor the local elections in 2024, Transparency International BiH (TI BiH) initiated 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 area of online promotion.

The monitoring lasted for two months of the so-called pre-election period (July, and August) and one month of the official campaign (September), including Election Day. The objectives of the monitoring were to record the behavior of political parties and candidates, uncover the misuse of public resources for party promotion, assess the costs of the election campaign, and monitor the behavior of public institutions and enterprises during the pre-election process. **During this period, the monitoring covered 26,000 candidates and 168 political entities** in the 2024 Local Elections, and activities took place in all local communities in Bosnia and Herzegovina. **An interactive map was published ([https://lookerstudio.google.com/u/0/reporting/213b660a-954e-44bb-9f0c-d31b217f7efb/page/p\\_gmvn0vmnjd](https://lookerstudio.google.com/u/0/reporting/213b660a-954e-44bb-9f0c-d31b217f7efb/page/p_gmvn0vmnjd)), where 769 projects worth 599,265,788 KM and 336 different donations to various population categories totaling 59,053,354 KM were located.**

Based on the monitoring and the data derived from it, TI BiH presented the results of the monitoring of election campaign costs, which show that political parties spent around **10.8 million KM by October 1st on billboards, media advertisements (television and print media), Meta company ads, and pre-election rallies.** TI BiH observers recorded over 2,570 instances in the past three months that can be characterized as the use of public resources for the election campaign. **A total of 123 reports were submitted to the relevant institutions, and the Central Election Commission has so far imposed 18 sanctions based on TI BiH's reports, totaling 115,500 KM.**

The monitoring of pre-election activities for the 2024 Local Elections was conducted in a specific context, reflecting the amendments made to the Election Law of Bosnia and Herzegovina through decisions by the High Representative, which more specifically address the issue of the misuse of public resources. These amendments served as a kind of test both for the candidates and political entities participating in the elections under somewhat stricter rules, and for the Central Election Commission, local election commissions, and other relevant authorities, as well as for civil society organizations like TI BiH that oversee the electoral process.

Given the circumstances, TI BiH paid special attention to these amendments during the preparatory period and adjusted its methodological framework in a way that would most objectively monitor the changes and enable action to be taken by the relevant authorities. However, despite the Central Election Commission receiving over 140 reports of public resource misuse with accompanying materials and evidence, most of the sanctions imposed by this body against political entities were related to premature campaigning, including the misuse of communication resources and posts on social media.

An example highlighted is the 3,000 KM fine imposed for violating the election law against the Democratic People's Union (DNS). Nenad Nešić, the Minister of Security of Bosnia and Herzegovina and president of the party, promised assistance and support for employment in BiH

institutions to party supporters from Višegrad if they achieved a good result in the elections. This was recorded on an audio clip, which TI BiH submitted to the Central Election Commission and the relevant prosecutor's office.

## *2.2. Appointments/employment and holding an office in the public sector free from undue influence*

During the reporting period, TI BiH, in cooperation with the Center for Integrity in the Defense Sector (CIDS) from Oslo, organized an event titled "Formal and Informal Rules in the Functioning of Public Administration in the Western Balkans," where a study was presented. The study assesses the extent to which both pillars, formal and informal, align with international standards regarding professionalism based on merit, impartiality, and ethical conduct in public office.

Additionally, a collection of papers titled "Two Decades of Public Administration Reform in BiH – (Un)Learned Lessons" was published, focusing on the analysis of public administration reform in BiH over the past 20 years and providing guidelines for reforms in the upcoming period.

Furthermore, regarding efforts to improve the area of appointments and the exercise of public functions in the public sector without undue influence, TI BiH continued its work in 2024 on identifying and reporting potential cases of conflicts of interest in Bosnia and Herzegovina. At the same time, TI BiH undertook legal and advocacy activities to strengthen the integrity of public institutions. As a result of previous activities, in February, the BiH Commission for Deciding on Conflicts of Interest sanctioned Draško Milinović, the director of the BiH Communications Regulatory Agency (RAK), and at the same session, proceedings were initiated against Minister Sevlid Hurtić and BH Telecom Director Amel Kovačević. The new Law on Preventing Conflicts of Interest in Institutions at the BiH level was adopted in March, but its implementation was postponed for six months, the process of selecting a new commission was finished at the end of 2024..

Given that the commission responsible for deciding on conflicts of interest at the FBiH level has not yet been formed, and a new Law on the level of FBiH was not adopted, TI BiH has addressed various bodies in this entity, seeking action to resolve the incompatibility of functions.

Specifically, TI BiH reached out to:

- The Legislative-Legal Commission, the Justice and Public Administration Committee, and the European Integration Committee of the FBiH Parliament, presented data indicating a conflict of interest regarding Ramo Isak, the Federal Minister of the Interior. According to available information, the company "CONDOR" d.o.o. Zenica, owned by Isak's wife, entered into contracts with public authorities in 2023 exceeding 5,000 KM. At the time, the company's director was his son.
- The Ethics Commission of the FBiH Parliament for verification and further action regarding conflicts of interest. Based on available information, the City of Cazin had entered into public procurement contracts with the company "Voće-Durić d.o.o. Cazin," founded by Irfan Durić, an elected representative in the House of Representatives of the FBiH Parliament.

- The FBiH Government and the Public Institution "National Park Una" with information pointing to a clear conflict of interest regarding the appointment of Alen Zulić, a counselor in the Bihać City Council, as the acting director of this public company.

Earlier, TI BiH reported Amela Mehmedović, a councilor in the Živinice Municipal Council, to the Cantonal Administrative Inspectorate for having spent half of her term as an assistant minister in the Government of Tuzla Canton, which constitutes a conflict of interest. The Central Election Commission, which has the authority to revoke mandates in such cases, refused to take action, citing the Law on Civil Service of Tuzla Canton as the basis. TI BiH then submitted a complaint to the Ministry of Justice and Administration of Tuzla Canton, but the inspectorate also refused to act, even though it was clear that Mehmedović should not have held both positions simultaneously without approval, which could not have been issued. The disciplinary procedure initiated against Mehmedović in the Ministry of Culture, Sports, and Youth of Tuzla Canton was dismissed because TI BiH's complaint arrived late, allowing her to continue holding both positions. Due to suspicions that the then Minister of Culture, Sports, and Youth of Tuzla Canton, Ivana Mijatović, deliberately failed to submit the complaint on time, thereby granting Mehmedović an advantage, TI BiH filed a criminal complaint against Mijatović for abuse of office.

These examples illustrate how, due to interconnected legal solutions that address a single area at multiple levels, as well as the lack of a competent body to determine and sanction conflicts of interest, a legal confusion is created in this BiH entity that prevents the application of the law and allows institutions to avoid their jurisdiction. The result is that the area of conflict of interest and the phenomenon of holding multiple positions in the Federation of BiH remains unregulated and without sanctions.

Regarding the Republic of Srpska, TI BiH, in addition to submitting reports to the Commission for Conflict of Interest, has initiated several administrative disputes before the competent courts. Among the most significant cases are the earlier reports against Ranko Bošnjak and Slobodan Župljanin for simultaneously holding incompatible positions, where the competent Commission did not determine any conflict of interest in either case. Following this, TI BiH initiated administrative disputes, considering that the decisions were based on incomplete checks. Additionally, TI BiH previously initiated a procedure against Milan Tegeltija, an advisor to the President of RS, for managing FK Borac Banja Luka, which is funded from the budget. After the initial decision to suspend the procedure was annulled, the Commission refused to conduct a renewed procedure, and the final decision on the case will likely be made by the District Court in Banja Luka.

Additionally, TI BiH regularly informed the Commission for Conflict of Interest about potential cases of conflict of interest. One such case involves the appointment of Jelena Jaćimović Janjetović as a member of the Supervisory Board of the Public Utility Company "Komunalno" a.d. Kostajnica. She is the spouse of the Mayor of Kostajnica, Nikola Janjetović, which creates a conflict of interest under the law. Elected officials and their family members are not allowed to be members of the supervisory boards of public enterprises while holding public office.

In addition, TI BiH has initiated activities related to the development of a model and proposal for improving the functionality of public administration. The model includes a detailed analysis of the competencies of the cantons, an analysis of resources at the canton level, as well as recommendations for improving processes and optimizing management. In this regard, in 2024, the Concept for the Functional Review and Reorganization of Public Administration in BiH was developed, as well as the Overview of the Legislative Framework of Public Administration in the Zenica-Doboj Canton. These documents serve as a starting point for the development of the model and proposal for improving the functionality of public administration.

Also, TI BiH has worked on improving the legal framework by advocating for the improvement of the Law on Civil Service of BiH. TI BiH participated in the public debate regarding amendments to this law and created and submitted amendments that further specify the purpose of establishing a register, making it clear that the Employee Register is intended for managing staff employed in the institutions of BiH.

TI BiH also highlighted the harmful nature of the proposed amendments to **the Law on Civil Service of the Tuzla Canton**. Comments and proposals were submitted to the Government of Tuzla Canton, with a particular focus on the amendment that classifies the expression of personal views and opinions, as well as other information through social media and other media outlets, as a disciplinary offense. This could potentially harm the reputation of public service bodies and have consequences for individuals who report corruption.

### *2.3. Equal access for all legitimate actors to the decision-making process*

TI BiH, in cooperation with CSOs gathered in the coalition Initiative for Monitoring European Integration of BiH, has been advocating throughout the year for the establishment of an inclusive mechanism for civil society participation in Bosnia and Herzegovina's EU accession negotiations. Institutions such as the Directorate for European Integration, the Directorate for Economic Planning, and the EU Delegation to BiH have recognized TI BiH's efforts to contribute to this process, and they have included TI BiH representatives in forums discussing civil society participation in negotiations. These include the Enlargement Candidate Members Initiative and the group of civil society experts from candidate countries, who will participate in the work of the European Economic and Social Committee. Through training on advocacy and communication in the accession process, TI BiH has strengthened the capacity of civil society.

To raise public awareness about the EU integration process and clarify its significance, TI BiH launched a campaign featuring five short video materials. These videos simplify key terms related to the EU integration process and the opening of negotiations for EU accession. The campaign is being carried out through social media channels.

Additionally, over the past year, TI BiH prepared two analyses. The first, Analysis of the Draft Integration Program and Regional Comparative Analysis, examines the process of preparing the Draft Integration Program for BiH, providing an overview of practices from regional countries that have gone through this process in the past. The second analysis, titled The System of Coordination of EU Integration in the Context of Competencies in BiH – How to Make the System Functional?, evaluates the roles of various levels of government in BiH in the EU integration process. It focuses on the participation of institutions from different levels of government in the

work of the EU integration working groups, which serve as the operational bodies in the coordination system. Both analyses were presented at a conference in late November 2024, where concrete recommendations were provided for improving the current state.

TI BiH has submitted 20 initiatives to the governments and parliaments at all levels of government in BiH, aimed at improving the transparency of decision-making processes. As a result of these initiatives: The Assembly of the Central Bosnia Canton (SBK) developed a completely new website for the Assembly to improve transparency; The Government of FBiH adopted a decision to publish adopted minutes and laws from its sessions; Two commissions in the Parliament of FBiH decided to publish all materials for their sessions; The General Secretariat of the Council of Ministers initiated an effort to improve the Rules of Procedure of the Council of Ministers to enhance transparency; The Assembly of the Una-Sana Canton (BPK) launched activities to improve transparency and publish materials for its sessions.

In addition, TI BiH worked on enhancing the capacity of institutions to improve transparency in their operations. To achieve this, training sessions were organized for representatives of governments and parliaments, focusing on improving proactive transparency. The participants enhanced their knowledge regarding the need to advance transparency in their work. These training efforts are crucial in fostering a more transparent and accountable public sector in BiH, helping institutions understand and implement practices that promote openness and public trust.

In cooperation with the organization Vaša prava BiH, TI BiH developed a methodology for researching the current state of access to information at all levels in BiH. A total of 374 requests for access to information were sent to institutions following the methodology. Based on the collected data, an analysis was created and published. This analysis includes statistical data on the implementation of the law at all levels, an examination of the entire legal framework and its alignment with international standards, an analysis of the actions of the Ombudsman Institution for Human Rights in the field of access to information, the work of inspections, and an analysis of judicial practices based on cases handled by TI BiH. The analysis was published as part of a conference marking the International Day for the Freedom of Information. This report provides valuable insight into the current state of transparency and access to public information in BiH and highlights areas where further improvements are needed to align with global standards.

Alongside this, throughout 2024, TI BiH and Vaša prava BiH have been working on the development of an online tool for the automatic generation of requests for freedom of information. This tool aims to provide citizens, journalists, activists, and representatives of civil society organizations with an easy process for creating freedom of information requests, automating the generation of these requests, and offering a channel for seeking legal assistance from TI BiH or Vaša prava. The presentation of the online tool is planned for January 2025. Once launched, this tool will streamline the process of requesting public information, empowering citizens and organizations to hold public institutions accountable and ensuring more transparency in government activities.

TI BiH has also worked towards improving the legal framework to ensure the right to access information. In this regard, TI BiH has focused on the Law on Freedom of Access to Information in Brčko District and has actively sought to participate in the process of creating a new law in the

District. TI BiH submitted proposals and comments to the Working Group drafting **the Law on Freedom of Access to Information (ZOSPI) in Brčko District**, with a particular focus on the key deficiencies of the draft, which, in essence, mirrors the recently adopted Law on Freedom of Access to Information in Bosnia and Herzegovina (ZOSPI BiH). By engaging in this process, TI BiH aimed to address gaps in the draft law, advocate for improvements, and ensure that Brčko District's legal framework on access to information aligns with international standards and best practices for transparency and accountability.

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### 3. ENFORCE LAWS AND SANCTIONS

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#### *3.1. Law enforcement institutions are independent and have the capacity and will to act*

TI BiH's monitoring of public enterprises, public institutions, and concessions resulted in 21 lawsuits and one request for an extraordinary review of a judicial decision. Out of the 13 rulings, 12 were in favor of TI BiH, while one was dismissive.

In cooperation with TI Czech Republic, a comparative analysis was conducted in 2024, analysing **the new Law on the Prevention of Money Laundering and Financing of Terrorist Activities in Bosnia and Herzegovina and its alignment with the legislation of the Czech Republic**. As part of this collaboration, the analysis was presented, and a training session was held for the media and civil society on the significance of Anti-Money Laundering (AML) legislation, particularly concerning the register of beneficial owners and politically exposed persons (PEPs). Experiences from the Czech Republic regarding the establishment and use of these registers were shared. Additionally, TI BiH has continued its advocacy for the establishment of a beneficial ownership register in Bosnia and Herzegovina, in line with international standards and best practices.

#### *3.2. The judiciary is independent and has the capacity and will to act*

The Tuzla Canton Prosecutor's Office issued an order to suspend the investigation against the former management of the Kreka Mine Tuzla, which had awarded contracts worth nearly one million BAM to the companies Junuzović-Kopex, MHI KOMPANI, and Cayenne Company without a tender. Transparency International (TI) BiH filed a criminal report about this case in 2019, as there was reasonable suspicion that the mine's management had circumvented public bidding for renting mining machinery and instead awarded it to these companies by signing 149 direct agreements. What is particularly troubling is that the prosecutor in this case failed to provide TI BiH with the prosecutorial decision for over a year, even though it was required to be delivered to the complainant within three days. This deprived the complainant of the opportunity to file an appeal, and the decision was only provided after several inquiries and TI BiH's appeal for not receiving the information.

Following this, TI BiH submitted a complaint to the Office of the Disciplinary Prosecutor of the High Judicial and Prosecutorial Council. Furthermore, TI BiH also filed an objection to the prosecutor's decision with the Chief Prosecutor of the Tuzla Canton Prosecutor's Office, as crucial facts from the criminal complaint were ignored. The investigation was closed with the

justification that “although the suspects acted contrary to the provisions of the Law on Public Procurement and the Public Procurement Rules, their actions were not against the interests of the service.”

The decision of the Cantonal Prosecutor's Office of the Central Bosnia Canton (SBK) not to investigate the responsible individuals for the failure to pay concession fees worth over 1.7 million BAM was overturned by the Federal Prosecutor's Office. This decision came after a complaint filed by TI BiH, which had reported the case two years ago. Despite this, the acting prosecutor and the chief prosecutor of SBK had decided not to initiate an investigation against the officials in the cantonal government who failed to initiate enforcement actions for the collection of these fees. However, following TI BiH's complaint, the Federal Prosecutor's Office accepted the appeal and ordered actions to be taken to fully ascertain the circumstances and facts in this case.

TI BiH's complaint pointed out that a significant number of concessionaires in the Central Bosnia Canton (SBK) had failed to pay their obligations, and some had even ceased operations, while the Ministry of Economy had not terminated their contracts. Furthermore, the Ministry of Finance had not initiated enforcement procedures by activating promissory notes. There were delays of up to nine months between receiving the request and the freezing of the accounts of some concessionaires, allowing them to avoid paying their obligations. This situation caused considerable damage to the budgets of both the canton and the municipalities.

TI BiH continued to monitor the judiciary, particularly through monitoring corruption prosecutions. In 2024, it published a report on the prosecution of corruption cases in courts and prosecutors' offices in BiH, providing detailed data on corruption prosecutions (including specific statistics on high-level corruption prosecutions, as defined by the HJPC). Additionally, the data on the interactive corruption prosecution map were updated with information for 2023 (available at [www.mapa.ti-bih.org](http://www.mapa.ti-bih.org)).

Furthermore, in 2024, research was conducted on the judiciary transparency index in BiH, in collaboration with BIRN BiH. The results of this research are expected to be presented in the first quarter of 2025.

Additionally, the judiciary's response to the most complex forms of crime, particularly high-level corruption, was analyzed for the period from 2021 to 2023 and presented in the analysis titled *"Quality and Efficiency of High-Level Corruption Prosecution in Bosnia and Herzegovina"*. The analysis of the efficiency of corruption prosecutions reveals poor results for the BiH judiciary, primarily due to the exceptionally low number of cases in this category, which impacted the number of investigations initiated and indictments raised. As solutions to improve the quality and efficiency of high-level corruption prosecutions, legislative and practical measures were proposed, focusing on strengthening the human and institutional capacities of the judiciary system. Special emphasis was placed on the integrity, independence, and expertise of judicial personnel, as well as creating adequate conditions for effective handling of such cases.

### *4.3. The legal framework is in line with international anti-corruption standards*

**During 2024, TI BiH was active in advocating for the alignment of legislation with international standards. In this regard, TI BiH participated in and organized several events related to the drafting of the new Law on the High Judicial and Prosecutorial Council (HJPC) of Bosnia and Herzegovina.** This included organizing a series of meetings with representatives from the judicial community and providing concrete proposals and comments on the draft law prepared by the Working Group for the development of the new law. Additionally, 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, with some of its concerns being reflected in the official opinion of the Venice Commission.

Furthermore, TI BiH continued its regular monitoring of the HJPC sessions to stay informed about the most significant developments in the judiciary, which facilitated the preparation of comments and proposals for the new law on the HJPC. TI BiH also participated in consultations on the new law organized by the OSCE Mission and in public consultations organized by the Ministry of Justice of BiH, where key objections to the draft law were presented, along with suggestions for improvement. Additionally, TI BiH organized a roundtable in collaboration with the Joint Coordination Body of Judges and Prosecutors' Associations in BiH, during which specific provisions of the law were thoroughly discussed, and concrete proposals for improving the quality of the legislative solution were presented.

TI BiH's key objections from the outset of the process included the lack of transparency and the exclusion of all relevant stakeholders from the drafting process. They also identified the direct political influence on the process of selecting members of the council through the so-called regionalization. Additionally, TI BiH raised concerns about inadequate provisions related to conflicts of interest among council members, incompatible jobs for holders of judicial functions, the scope of relatives for whom property must be declared, the level of transparency of data in property statements, and the insufficient basis for the exchange of necessary data for verifying property statements. These issues, according to TI BiH, undermine the entire process, as the exchange of relevant information is crucial for ensuring the integrity and transparency of the judicial selection process.

In parallel with activities related to the preparation of the new Law on the High Judicial and Prosecutorial Council (VSTV), TI BiH prepared and submitted an initiative to VSTV for the proactive publication of statistical data on the prosecution of corruption in Bosnia and Herzegovina. The initiative proposes the publication of statistical data on the prosecution of corrupt criminal offenses on the VSTV website, as well as the publication of more detailed data in machine-readable formats. This move aims to increase transparency and accountability within the judicial system, particularly concerning corruption cases.

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, by the Parliamentary Assembly of BiH. TI BiH pointed out that important provisions of the law were amended at the last minute, and that the law-making process had been carried out without adhering to basic international standards, such as conducting consultations, preparing an impact assessment, and ensuring transparency in the process through external institutional arrangements. This highlights the

continued challenges in ensuring a transparent and inclusive law-making process, especially when it comes to regulations designed to prevent conflicts of interest within the public sector.

TI BiH actively participated in the development of the new Anti-Corruption Strategy for Bosnia and Herzegovina for the period 2024-2028, as well as its accompanying Action Plan. This involvement included participation in the Working Group for the preparation of the strategy, as well as preparing and submitting comments and proposals during the public consultations. By engaging in this process, TI BiH aimed to ensure that the strategy effectively addresses key issues related to corruption, enhances transparency, and promotes the necessary institutional reforms to combat corruption in the country.

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## 4. DEFENDING CIVIL SOCIETY AND PROMOTE INTEGRITY

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### 4.1. Promoting integrity-based values

**In April 2024, the new National Integrity System (NIS) Study 2023 was presented and promoted, highlighting key findings that were further disseminated through social media channels.** The conference brought together a large number of representatives from the international community, domestic institutions, media, and civil society. Additionally, TI BiH representatives presented the regional NIS report at the International Anti-Corruption Conference (IACC) held in Vilnius, Lithuania, and at the regional Open Government Partnership (OGP) meeting in Tirana, Albania. These presentations helped further the discussion on strengthening anti-corruption measures and promoting greater transparency in governance across the region.

**The geopolitical forum titled "EU Enlargement in the Era of Geopolitics"** was held, featuring guests from the Carnegie Foundation and local experts. The forum focused on the topic of meritocracy within the EU integration process in light of the latest geopolitical developments. The discussions centered on the importance of maintaining merit-based criteria for EU accession while considering the broader geopolitical context and challenges that influence the integration process. This event provided valuable insights into how Bosnia and Herzegovina, along with other countries in the region, can navigate the complexities of EU enlargement amidst shifting global dynamics.

In line with the previously jointly developed training plan with the Public Procurement Agency, TI BiH, in cooperation with the E-Government team, organized a training for employees at the Public Procurement Agency on the topic: "Strategic Aspects of Public Procurement with a Focus on Innovative Solutions – Innovation Partnership Procedure." The goal of this training was to enhance the knowledge and skills of participants regarding a strategic approach to public procurement and the application of innovative procedures in practice. This initiative aimed to improve the overall capacity of the Agency to effectively implement innovative procurement practices, which are crucial for modernizing public procurement systems and increasing efficiency in public service delivery.

To strengthen the capacity of governments and parliaments in Bosnia and Herzegovina (BiH) in the area of proactive transparency and openness of institutions, TI BiH organized two training sessions. During these sessions, participants had the opportunity to improve their knowledge of

proactive transparency and openness of public institutions. Representatives from various governmental and parliamentary bodies attended these training sessions, including the General Secretariat of the Council of Ministers of BiH, the Assembly of the Bosnian-Podrinje Canton, the Government of the Zenica-Doboj Canton, the Assembly of Canton Sarajevo, the Government of the Federation of BiH, Parliament of the Federation of BiH, Assembly of the Herzegovina-Neretva Canton, Assembly of the Una-Sana Canton, Assembly of the Central Bosnia Canton, Government of the Central Bosnia Canton, Assembly of Canton 10 (Livno), Government of Canton 10 (Livno)

The goal of these training sessions was to enhance the participants' understanding and implementation of proactive transparency policies, helping to ensure greater openness in public institutions, fostering accountability, and improving public trust in government bodies.

#### *4.2. Activists, whistleblowers, and journalists are free and protected to act against abuse*

In 2024, **TI BiH's Center for Legal Assistance in the Fight Against Corruption (ALAC) received 1,694 calls to the free hotline for reporting corruption cases and initiated 391 cases.**

As part of the follow-up on citizen reports, several criminal charges were filed, including:

- **Criminal report to the Tuzla Canton Prosecutor's Office against the Minister of the Ministry of Culture, Sports, and Youth of the Tuzla Canton, Ivana Mijatović.** The report was filed for her willful failure to submit a disciplinary report against a ministry employee within the prescribed deadline, causing the case to become statute-barred.
- **Criminal report against the members of the Management Board of "Public Health Institution Health Center with a Hospital" Olovo.** There is suspicion that, as official and responsible persons, they committed the criminal offense of Abuse of Position or Authority under Article 383 of the Criminal Code of the Federation of BiH and Negligent Work in Office under Article 387 of the Criminal Code of FBiH.
- **Criminal report against the Minister of Culture, Sports, and Youth of Tuzla Canton.** 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 Federation of BiH, for failing to perform his duties, specifically the obligation to initiate disciplinary proceedings against an employee in the ministry who violated the law, thus providing an advantage to that employee.

These actions reflect TI BiH's continued efforts to monitor and address corruption through both legal mechanisms and public awareness.

In one of the cases from earlier periods, the Federal Prosecutor's Office of the Federation of BiH accepted the complaint from Transparency International BiH and annulled the decision not to investigate the case of a rigged competition at the Oriental Institute of the University of Sarajevo. TI BiH had filed a criminal complaint back in 2019 because the Institute conducted a public competition for the hiring of a librarian in a manner that "secretly" selected the best candidate, while other candidates were not notified about the selection for a full nine months, depriving them of the right to file an appeal.

In the same period, **32 administrative disputes were initiated before the competent courts related to the right of access to information.** Of the administrative disputes initiated in previous period, **18 were resolved in favour of the TI BiH, while claims in three cases were rejected, prompting further legal protection mechanisms.**

Additionally, **4 appeals were submitted to the Constitutional Court of BiH,** one of which was rejected. **The Constitutional Court of BiH accepted one appeal filed in 2023 and established a violation of the right to a trial within a reasonable time.**

Finally, **4 lawsuits were drafted for clients, of which 2 were accepted, while 2 are still in the decision-making process.**

Following the complaints filed by TI BiH regarding human rights violations, the Ombudsman Institution for Human Rights issued 4 recommendations:

- JU "Dom zdravlja sa stacionarom" Olovo – The Ombudsmen instructed the management board to stop the practice of appointing acting directors for fixed periods of 6 months and to take necessary actions to ensure timely completion of the procedure for selecting and appointing a permanent director.
- Željeznice FBiH d.o.o. Sarajevo – The Ombudsmen recommended that the company align its practices with the findings from the recommendation and eliminate discriminatory treatment of certain categories of people. TI BiH had approached the Ombudsman due to the company's failure to announce public calls for professional training for independent work or for taking professional exams, as prescribed by the regulations. At the same time, public job ads for employment required candidates to have passed the professional exam.
- Ministry of Administration and Local Self-Government of RS – The Ombudsman issued a recommendation after TI BiH raised the issue of an incomplete decision being delivered by the Ministry, which lacked the necessary signature and seal, thereby hindering further legal protection.
- Mayor of Mostar – The Ombudsmen issued a recommendation in response to the refusal to cooperate with the institution. This followed TI BiH's complaint, in which the Ombudsmen sought a response from the Mayor of Mostar regarding the new regulation on real estate records, which stated that real estate records were not considered a public register and that data from these records would be treated as business secrets.

The Capital portal revealed that the Government of the Republic of Srpska signed a secret contract with the Chinese company ELINC, which is linked to the military industry. The contract, valued at 57 million BAM, concerns the procurement of digital protection software for all institutions in the Republic of Srpska. According to multiple credible sources confirmed by Capital, the agreement was signed in early June this year. Afterward, the contract was classified as secret, to conceal another expenditure of tens of millions of BAM on software, including its intended use.

The plan is to implement this software across all institutions in Srpska for ten years. The company ELINC was awarded the contract based on prior agreements behind closed doors, without a public tender or any notification to citizens, who will ultimately bear the costs. This

raises concerns about transparency and accountability, as the public has not been informed about such a large-scale expenditure and its impact.

The Government of the Republic of Srpska negotiated the secret contract with the Chinese company ELINC during a session in mid-May, under "other matters" on the agenda. This move allowed them to avoid informing the public and issue a public call, taking advantage of the amended Law on Public Procurement in Bosnia and Herzegovina to conceal the spending of tens of millions of marks.

In response, TI BiH provided support to Capital journalists in exercising their right to access information, which after an exhaustive process led to the initiation of an administrative dispute.

Furthermore, at the request of residents and activists from Livno, who formed the informal group "Zaštito izvore Mandeka" (Protect the Mandeka Springs), which is opposed to a water exploitation concession, several meetings were held with them, including consultations with the Minister of Economy, the Cantonal Prosecutor, and a lawyer. A legal procedure is underway to establish the nullity of the concession agreement before the competent court. Based on TI BiH's support and consultations with all city councilors, the City Council has withdrawn its previously given conditional consent for the concession.

During reporting period TI BiH prepared and send comments and amendments for 17 draft laws, bylaws, strategies and other documents.

#### *Protection of the rights of journalists and Activists*

To reduce the consequences of the criminalization of defamation, TI BiH has been working on educating journalists and activists on protecting themselves from criminal prosecution for defamation and their rights in criminal proceedings. As part of this component, TI BiH has created a **Handbook for Journalists and Activists** on how to protect their rights after the amendments to the Criminal Code (<https://ti-bih.org/wp-content/uploads/2024/02/T-BIH-PRIRUCNIK-WEB-3.pdf>)

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

To further educate activists and journalists about protecting their rights and providing practical guidelines, training programs were developed, and 5 training sessions were held across the country. During the training, TI BiH representatives introduced and promoted contact points for seeking legal assistance and presented various aspects of legal aid, which were also promoted through the Handbooks. The total number of participants in the training was around 90. In addition to the training, the handbooks were also directly mailed to organizations and media outlets.

TI BiH has also established other forms of administrative and legal support for CSOs, providing assistance to organizations in registering at a different administrative level to potentially avoid

harmful consequences if the Law on NGOs of RS is adopted. TI BiH engaged a lawyer and provided support for the registration of 3 organizations.

### *Defending civic space*

A significant part of TI BiH's efforts in 2024 focused on advocating for **the defending of civic space**, which included **not only providing support to NGOs, the media, and journalists/activists to protect their rights but also advocating against the adoption of harmful legislative solutions, such as the Law on the Public Work and Registry of Non-profit Organizations of RS (the so-called "Foreign Agents Law")**.

TI BiH has initiated activities on various fronts: informing international and domestic stakeholders about the harmful contents of the law and calling on all organizations to take action against its adoption. This has been done through letters, press releases, meetings, media statements, coordination with CSOs and media in RS for joint action, advocacy, public campaigns against the adoption of the law, production of media content, press statements, etc.

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

TI BiH also coordinated with other civil society organizations to draft analyses of the proposed provisions, create initiatives for the institutions, and participate in/ boycott public discussions on the law proposal. 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 proposed law.

Even after the withdrawal of the law proposal from the procedure, TI BiH continued its efforts to raise awareness among relevant actors about the dangers of this law at both national and international levels, to lay the groundwork for preventing further proposed initiatives. This included participation in international events as a speaker and the 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, organizing an international thematic workshop on legislation related to foreign agents, meetings with EU and other international officials in Brussels, and in BiH, etc.

In addition to advocacy, TI BiH also coordinated the civil society communication approach aimed at addressing negative or mitigating reputational consequences, given the negative campaign conducted by the authorities against civil society. This included training for CSOs on communication strategies, the engagement of communication experts, and the creation of a communication strategy for CSOs, as well as organizing practical workshops aimed at content creation. Following this, 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 have an influence on citizens in BiH, to engage them in messages against the law. Meetings and consultations were held with Proglas from Serbia (gathering prominent figures 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, and others.

As part of this coordination, press releases were issued by various organizations from the region, including Civil Initiatives and 11 other organizations from Serbia. Cooperation was also established with other public figures to spread the message in a satirical way, including Zoran Šprajc from Croatia. Meanwhile, TI BiH published infographics and videos with contradictory statements about international support, which were later re-activated by other actors, including distribution across nearly 50 Facebook groups.

The entire concept of the communication approach before parliamentary sessions was based on the organic production of content and reaching out to an audience that typically does not follow the work of NGOs. In this regard, cooperation was established with media outlets and authors across the region to produce articles on this topic.

In addition to dealing with the law on foreign agents, TI BiH and other members of its core group began producing content that highlights the relevance of the work of CSOs from the perspective of the users of their services. TI BiH created a video featuring testimonies from citizens who have previously received legal assistance from TI BiH. The video (<https://www.facebook.com/TIBiH/videos/406943148843598>) reached 500,000 views on Facebook and 50,000 views on YouTube. Other types of content were also created to showcase the diversity of the work of NGOs, in collaboration with partner organizations. TI BiH, together with other civil society organizations, produced 8 different videos/testimonies that demonstrate the support CSOs provide to citizens and various groups fighting for their rights.

One of the most important outcomes of the communication approach was the documentary film on the suppression of civil liberties in the Republic of Srpska, titled *(Re)Public Enemy*. The film portrays events from the past 15 years, culminating in the proposed law, from the perspectives of various actors — both those in power and those who were targeted by the authorities. The aim is to reveal the true intentions behind these initiatives. The documentary will be released and promoted in January 2025.

#### 4.3. Citizens are empowered to demand accountability

TI BiH has created the **analysis "The Rule of Silence: Challenges and Perspectives of Whistleblowing in BiH"**, which provides an overview of the state of whistleblowers in Bosnia and Herzegovina. It attempts to answer the question of why whistleblowing in both the public and private sectors remains a rare occurrence, despite the widespread belief among citizens, the business and academic communities, and civil society organizations that corruption is a prevalent issue in BiH. Based on available data and a brief analysis of the legal and institutional framework for whistleblower protection, the analysis identifies obstacles that hinder this practice.

Throughout the previous year, TI BiH conducted a campaign that included over 10 representatives from the media, civil society, and the cultural sector, who emphasized the importance of publishing information and public documents by the executive and legislative authorities. The campaign called for the improvement of transparency in the decision-making process of public institutions and was carried out through social media channels. A total of 16 video materials were created and promoted. The campaign on Facebook reached over 356,000 users, while the videos on the YouTube channel garnered over 339,000 views.

#### *4.4. New generation of leaders empowered to act against corruption*

During the reporting period, TI BiH continued its efforts in educating and networking young leaders through the TI BiH Integrity School. **In 2024, the eighth generation of the Integrity School was implemented, and so far, around 200 young people from BiH have participated in the school.**

The Integrity School is based on the concept of a social integrity system that includes key institutions, sectors, or "pillars" that contribute to integrity, transparency, and accountability in society. The school combines an academic approach with practical experience, intending to develop and acquire the knowledge and skills necessary for young activists and future leaders for successful social engagement and action in the public interest.

In 2024, **the PressStart educational program was completed, which helped future journalists and activists launch new independent media outlets (five portals and podcasts).** Educational workshops and training sessions were led by experienced journalists in investigative journalism, experts in digital marketing, editing, and others, providing participants with the opportunity to learn the basics of investigative journalism, as well as several mentoring sessions designed to facilitate the creation of a sustainable media strategy for future media outlets.

Additionally, in February, a two-day workshop was organized for students and journalists (60 participants), where they had the opportunity to familiarize themselves with key 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 inclusivity and reducing the risk of conflict. The research findings were previously presented at a conference that brought together 65 key actors from domestic and international institutions.

In collaboration with the USAID *E-Government* project, TI BiH organized training for civil society organizations on monitoring public procurement using new digital tools developed to enhance transparency and efficiency in public spending. Participants had the opportunity to learn about

the results of the *E-Government* project and the latest achievements in the field. Additionally, newly joined organizations underwent basic training on public procurement during the event.

Additionally, regarding the dissemination of information about systems developed under the *E-Government* project, TI BiH created a manual for civil society organizations (CSOs) on data collection, analysis, and dissemination. The manual covers all functionalities and processes from which CSOs can extract data or request its delivery from relevant institutions. This document serves as a guide for civil society organizations in collecting, analyzing, and sharing information from the developed system, to increase transparency and accountability.

In 2024, **TI BiH launched a new initiative called the "Policy Lab for Good Governance"**. This initiative serves as a platform for collaboration between young researchers and public policy practitioners in Bosnia and Herzegovina, promoting an innovative, inclusive, and evidence-based approach to solving key governance challenges. The areas and topics covered by the *Policy Lab* include: transparency and accountability, anti-corruption strategies, public sector reform, rule of law, public policies and service delivery, sustainable development and management, institutional capacities, human resources, and more. In this context, a public call for researchers was announced in November, with a public presentation held in December, while the selection of research proposals will be in the first quarter of 2025.

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## 5. INTERNAL CAPACITIES

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### *Strategic planning*

During the reporting period, TI BiH organized annual strategic planning, as a regular activity of TI BiH to identify strategic priorities and goals for next year. Considering that the TI BiH Strategy was adopted for the period of 10 years, one part of the strategic planning session served as a planning session for mid-term goals and analysis of the political environment and citizens' needs. The second part of the strategic planning session was devoted to the annual planning of the activities for the next year.

### *Organization of TI BiH assembly meeting*

During the reporting period, TI BiH organized its regular Assembly Meeting with the TI BiH Members to review TI BiH work and results, as well as discuss and adopt annual reports of the TI BiH Board as well as the TI BiH Executive Director. During the session, the new Chair of the Board of Directors was elected.

### *Establishing M&E system*

Based on the findings of the evaluation of previous core support of SIDA to TI BiH, during the previous year, TI BiH started with the process of establishing of Monitoring and Evaluation System. In this regard, TI BiH has engaged external experts to analyse the work of TI BiH and internal processes for reporting, and propose the M&E system. The External evaluator held a joint workshop with all TI BiH employees to gather all relevant information in the process of creation of the M&E system.

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## 6. ADDITIONAL INDICATORS

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

### *Media presence*

Based on the activities, **TI BiH had 5,150 media publications in 2024, of which 4,620 articles were in the digital space, i.e., online portals, while 354 segments were broadcast on television channels covering Bosnia and Herzegovina, and 184 articles were published in print media.**

Below is an overview of the media outlets that most frequently published content based on the activities of TI BiH:

<b>Online portals</b>	<b>4620</b>
Antikorupcija.info	140
Rtvbn.com	98
Jajce-online.com	90
Slobodna-bosna.ba	88
Impulsportal.net	84
N1info.ba	80
Istokrs.com	80
Oslobodjenje.ba	79
Fokus.ba	76
Federalna.ba	72
Inforadar.ba	71
Etto.ba	67
Crna-hronika.info	63
Direkt-portal.com	63
Hercegovina.info	62
Valterportal.ba	62
Gerila.info	61
Bosnainfo.ba	57
Capital.ba	57
072info.com	56
Srpskainfo.com	55
Bljesak.info	53
Interview.ba	49
Akta.ba	48
Infoveza.com	47
6yka.com	46
Bhrt.ba	46
Avaz.ba	45
Dnevni.ba	44
Ljubuski.net	43
Other	2638

<b>Television</b>	<b>354</b>
Radio Televizija FBiH	62
Radio televizija BN	52
N1 televizija (BiH)	50
Radio televizija Bosne i Hercegovine	50
Nova BH	34
Al Jazeera	29
TV OBN	21
O kanal	19
NTV Hayat	12
Face TV	10
Televizija Sarajevo	9
UNA TV	4
TV ALFA	2
<b>Printed media</b>	<b>184</b>
Dnevni list	69
Oslobođenje	45
Dnevni avaz	28
Nezavisne novine	15
Euro Blic	12
Večernji list	6
Unsko-sanske novine	3
Poslovne novosti	3
Dnevni avaz - Panorama sedmice	1
Banke	1
Večernje novosti - Republika Srpska	1

Although the internet and online media are the primary channels of media communication globally, as well as in Bosnia and Herzegovina, traditional media, especially television, still hold significant importance. Television continues to have the strongest impact, particularly in terms of the level of trust the public places in it as a source of information, which is higher than that of other media, as confirmed by numerous studies.

In this regard, it is important to highlight that TI BiH's activities and findings in 2024, resulted in a total of **1,379 minutes of televised programming on some of the most-watched television channels in Bosnia and Herzegovina**. This not only strengthened the media presence of the organization but also contributed to raising awareness and influencing public opinion in general about the harmful effects of corruption as a phenomenon, as well as its specific manifestations, societal circumstances that enable it, and the problems it causes.

Television	Minute	# of releases
Radio Televizija Federacije Bosne i Hercegovine	305	62
Radio televizija Bosne i Hercegovine	197	50
N1 televizija (BiH)	196	50
Radio televizija BN	181	52
Nova BH	132	34
Al Jazeera	98	29
O kanal	62	19
Face TV	62	10
TV OBN	54	21
NTV Hayat	43	12
Televizija Sarajevo	26	9
UNA TV	12	4
TV ALFA	11	2
UKUPNO	1379	354

On the websites of TI BiH and Transparentno.ba, **a total of 91 articles were published, of which 54 were posted on the site ti-bih.org, while 37 investigative stories were published on the Transparentno.ba portal. During this period, Transparency International also sent 26 official press releases to the media.**

#### *Social networks:*

- Facebook: A total of 115 posts were recorded, reaching **3,009,578 users**.
- Instagram: A total of 108 posts, reaching **151,663 users**.
- Twitter: 269 posts with **103.600 of impressions, 5141 comments and other engagements**.
- LinkedIn: Recorded **4,866 impressions**.

- YouTube: The TI BiH channel achieved **1,311,670 views and 15,500 hours** of content watched, while the Pretres podcast channel recorded **53,752 views and 4,800 hours** of content watched.

*Web pages and databases :*

The TI BiH website recorded **178,948 views from 75,051 users**. The Transparentno.ba portal, which publishes investigative journalism articles, was visited by **49,122 users, generating 80,869 views**. The databases created to monitor and identify irregularities in the distribution of public funds saw significant traffic, primarily due to the diversity of the data and the fact that many of the offered data and information are not available in any official public registers active in Bosnia and Herzegovina (for example, there is no official data on active public enterprises in BiH).

In this way, these services have become a valuable resource for researchers, editors, academics, and representatives of public institutions and decision-makers, providing access to critical information about the functioning of the public sector in Bosnia and Herzegovina.

<b>Database</b>	<b># of views</b>
Register of SOEs	10,619
Register of Public Officials	17,512
Register of concessions	16,200
Register of Public Institutions	29,585
Register of allocation of funds for NGO	15,277

Other projects also recorded a significant number of views, such as "Report Corruption" with 14,287 visits, AcMonitor with 151, the Justice Index with 2,520, and the Corruption Prosecution Map with 2,253 visits.

Projects such as AC Monitor, Justice Index, Corruption Assessment Maps, the POPULUS project, the corruption reporting platform, Reflektor, Function Registry, Concessions, and Institutions collectively recorded 119,477 views and 77,356 visitors.

*Content created:*

A total of **37 investigative articles, 26 press releases, 103 graphics (mostly for Instagram and Facebook), 22 Facebook videos, 47 reels for Instagram and Facebook, and 13 YouTube videos were created.**