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## 1. INTRODUCTION

During 2025, the Legal Aid Center of TI BiH acted as a mechanism for the protection of the rights of citizens exposed to various forms of corruption, administrative non-transparency, and abuse of position and authority in institutions. In addition to direct legal assistance, a significant part of the activities was aimed at strengthening the transparency of institutions and improving the legal framework for access to information, oversight of public contracting and the protection of public resources (such as public procurement and concessions), as well as addressing deep structural weaknesses in the area of political integrity and the judiciary.

The report also highlights activities related to EU integration and providing support to the protection of public space and human rights.

The 2025 [Annual Report](#) bears witness to TI BiH's intensive engagement in a number of critical areas, producing systemic results despite the complex political context.

**Provision of legal aid and litigation:** In 2025, the [Anti-Corruption Legal Aid Center Transparency International in BiH](#) handled 364 new cases, of which 16 cases were initiated at the initiative of TI BiH, while the remaining 348 cases were handled on the basis of citizens' complaints/petitions. Through the toll-free telephone line 0800 55555, 1027 calls were answered by citizens who were informed about the possibilities of providing legal aid and reported various corrupt practices. During 2025, journalists requested and received free legal aid from the Center 57 times.

Also, on the official website of the [www.ti-bih.org](http://www.ti-bih.org), judgments of courts from all over Bosnia and Herzegovina related to the right to freedom of access to information are continuously published.

In 2025, TI BiH initiated 24 administrative disputes for violating the provisions of the Law on Freedom of Access to Information. At the same time, 24 administrative disputes initiated in recent years were resolved in 2025 in favor of TI BiH, while in 12 cases the claim/extraordinary legal remedy was rejected, after which further legal protection was initiated.

Thanks to concrete legal proceedings, BiH citizens and investigative journalists came into possession of a lot of information that was inaccessible to them. A total of 13 criminal charges were filed for irregularities (including 10 related to members of polling station committees). TI BiH also supported journalists and activists, drafting 8 lawsuits, 1 appeal to the Constitutional Court and 1 request for an extraordinary review of the court decision.

### **Transparency and Access to Information:**

A key breakthrough in access to information was achieved with the launch of the [PristupInformacijama.ba](http://PristupInformacijama.ba) platform. This platform allowed users to create 586 requests for access to information according to 3.334 institutions, and 52 were recorded. 482 visits. In Brcko District, the successful advocacy of TI BiH has led to key comments being adopted and the Law on Freedom of Access to Information prescribing the right of appeal, enabling faster and cheaper legal protection for citizens.

### **Public Contracting and Resources:**

In the area of public procurement, TI BiH has documented and reported serious indications of favouritism, such as the case of the construction of the "House of Respite" facility in Banja Luka, where the contractor was known 11 months before the formal completion of the tender. In the area of concessions, TI BiH has updated the register of concessions with data on 171 new contracts. Also, data on the collection of concession fees for 599 active contracts were

collected, with a total value of **101.523.173.54** KM.

The analysis of forest governance showed deep structural weaknesses and political influence, as **88%** of directors of forest enterprises and holdings have a clear political connection.

**Political Integrity and Elections:** TI BiH has published an analysis revealing that at least 2.6 million KM was spent on advertising in the campaign without being reported to the CEC. An analysis of the U.S. Census Bureau showed that there are more than **1.800** associations associated with political parties.

In connection with the elections, TI BiH filed **10** complaints with the CEC for premature campaigning and misuse of public resources, and based on the analysis of election trends, it called on the CEC to investigate suspicions of electoral fraud in the early elections in RS. As a result of public pressure, the CEC punished the SNSD for non-transparent financing of the pre-election event. TI BiH has also filed **13** complaints for conflict of interest against public officials.

**Judiciary and Integrity:** TI BiH has updated the interactive map of corruption prosecution, the findings of which show that the number of indictments issued is at the

lowest level in the last **4** years and that **51.5%** of final convictions for corruption crimes are suspended sentences.

Through strong advocacy for the improvement of the Law on the HJPC, TI BiH has contributed to the fact that the draft law is returned to the Ministry of Justice for refinement, due to the shortcomings observed.

**Protection of Human Rights and State Captivity:** Through cooperation and initiative, TI BiH contributed to the decision of the Constitutional Court of BiH declaring the Law on Special Register and Publicity of Work of Non-Profit Organizations unconstitutional. As part of the research, a methodology for measuring the State Captivity Index was developed, the results of which show systemic multidimensional capture through entrenched political clientelism.

**Visibility:** Digital tools and web platforms of TI BiH, including the Database of Public Institutions (over **218.000** visitors ) and access to information (**82.170** views), have confirmed themselves as key resources for public scrutiny. A total of **5.327** media posts, with a special emphasis on a strong reach on social networks, where over six million views of content were achieved on Facebook.

## 2. PROVIDING LEGAL AID TO CITIZENS

Throughout 2025, the Legal Aid Center of TI BiH continued to act as a mechanism for the protection of the rights of citizens exposed to various forms of corruption, administrative non-transparency, and abuse of position and authority in institutions.

This year, legal aid encompassed three key dimensions: (1) working with citizens and individual cases of corruption and violations of rights, (2) systemic interventions through strategic cases, and (3) legal assistance to the media and civil society organizations.

### Citizens' addresses, applications and the overall scope of the Centre's work

By November 2025, the Legal Aid Center had received a total of 294 reports from citizens and acted in 186 cases. The number of calls via the toll-free line 0800-55555 is 903, and the total number of applications, cases and calls indicates a decrease in the number of citizens contacting TI BiH. On the other hand, there is a noticeable increase in the number of cases initiated by TI BiH on its own initiative on the basis of research, monitoring, databases, and media reports.

Citizens most often addressed the following reasons:

- irregularities in the work of the state administration (employment and appointments, silence of the administration, incorrect application of the law),
- problems in health care institutions (denial of information, suspicion of abuse),
- violation of labor rights (unlawful dismissals, mobbing, unpaid wages),
- abuse in public companies and local communities.

- discriminatory decisions of the administrative authorities,
- conflicts of interest of public officials.

During the year, the Center submitted 184 written advices, and sent about 269 letters to the institutions, including urgencies and requests for action, complaints to prosecutors' offices, complaints in administrative and other proceedings, requests for access to information, reports for the protection of citizens' rights.

### The content of reports and the most common types of violations of rights

When it comes to citizens' reports and cases based on them, practice has shown thematic groups of violations of rights, which were the most represented in 2025:

#### a) State and local government

Irregularities in the work of state and local government bodies, as well as institutions and public companies, are the most common subject of citizens' reports. Some of the cases in which TI BiH has provided legal aid and treats institutions relate to: illegal implementation of public competitions and employment through service contracts, illegal conclusion of contracts for the distribution of public services, manipulation of public competitions in public institutions in the part of meeting special conditions and conflict of interest of commission members, illegal implementation of graduation excursions in the part of the selection of carriers, amendments to internal acts in order to adapt them to certain persons in the part of employment and appointment conditions, removal of illegally built buildings, inability to collect claims under the decisions of the Constitutional Court, which must be paid from public budgets, endangering the safety of citizens by not maintaining public roads, etc. There is a significant number of reports submitted by the so-called whistleblowers, and they relate

to various irregularities within public institutions, recruitment procedures, appointments, distribution of public funds, etc. For this reason, this year's focus was on **making concrete proposals for improving the situation in this area**. The proposals concerned the right of "whistleblowers" to choose to report irregularities inside or outside the institution, including the ability to address the media without fear of reprisals, the elimination of the possibility of "good faith" scrutiny, and ensuring that institutions act effectively in situations where "whistleblowers" suffer adverse consequences

### b) Judiciary

Citizens reported:

- failure to take judicial decisions within a reasonable time;
- Failure to respond to the prosecution's complaints,
- Dismissal of the application without adequate explanation

The treatment of cases related to the judiciary has shown a tendency towards citizens and whistleblowers, which is also reflected in the denial of the right to complain by not delivering prosecutorial decisions, preventing access to the orders it makes, challenging the right to object to the decision to suspend the investigation. That is why TI BiH has used all legal means, including complaints against prosecutorial decisions, but also filing disciplinary charges against prosecutors.

One of the most important cases is the **disciplinary sanction imposed on the prosecutor of the District Prosecutor's Office in Trebinje, imposed after a complaint filed by TI BiH** for failure to act in a case related to the procurement of diesel fuel worth over 25 million BAM in the company RiTE Gacko. TI BiH has established that this public company **carried out**

**diesel procurements in 2024** through a negotiated procedure without publication, which is a direct violation of the Law on Public Procurement. Despite the seriousness of the allegations, the prosecution delayed the prosecution's decision for months

In one case, TI BiH intervened after the prosecution dismissed a criminal complaint for abuse of office in a health facility in Tuzla — after which TI BiH filed a complaint about the failure to conduct an investigation.

### (A) Healthcare.

The reports related to:

- irregularities in internal competitions,
- unavailability of medical documentation,
- suspicions of abuse of official position in management boards.

In cases related to healthcare, TI BiH provided legal aid to citizens who complained about access to medical services, mainly specialist examinations, long waits, etc., where citizens were instructed on the ways in which they can file an objection or complaint. On the other hand, TI BiH has also acted on applications related to employment in healthcare, but it is specific that these applications refer to the manipulation of the competition in such a way that certain candidates are given questions in advance that will be on the competition, and that questions from the medical profession can be answered in several ways, i.e. more correct answers can be given. As long as the competition committee is biased against such answers.

### d) Conflict of interest

TI BiH has sent 13 reports to the **competent commissions for determining conflict of interest, as well as to other institutions**, related to conflict of interest, incompatibility of functions, which

are described in detail in the part related to **political integrity**.

## Criminal charges

Due to the refusal to act in accordance with the regulations and the failure to announce a public competition for the appointment of the General Director of this health institution, a criminal complaint was filed with the Cantonal Prosecutor's Office in Tuzla against the members of the Board of Directors of the Public Health Center Dr. Mustafa Šehović Tuzla for abuse of official position. In this case, the Cantonal Prosecutor's Office made a decision not to conduct an investigation, and a complaint was filed against it.

TI BiH has filed a criminal complaint with the Special Department of the FBiH Prosecutor's Office and the FBiH Supreme Court (POSKOK) against officials in the Government of the Federation of Bosnia and Herzegovina, the Federal Ministry of Labor and Social Welfare, the Government of the Una-Sana Canton, and the Ministry of Health, Labor and Social Welfare of the USC who committed the criminal offense of Abuse of Official Position or Authority because they did not have a legal basis to reach a conclusion annulling the already completed procedure for the election of members of supervisory boards in the Federal Institute of Drinking/MIO.

In addition, based on research and media reports, as well as monitoring of the election process, **11** criminal charges were filed, of which **10** relate to members of polling stations, and one to procurement of the City of Banja Luka.

## Legal aid to journalists, media and activists

TI BiH registered **54** requests and provided support to journalists and activists in cases related to access to information and procedural difficulties they encountered in their work. Legal aid was related to the drafting of appeals, assistance in formulating

requests for access to information, drafting statements for courts, etc. In **2025**, **8 lawsuits** were filed for journalists and activists, **1** appeal to the Constitutional Court of BiH and **1** request for extraordinary review of a court decision.

Acting on the request prepared by the Center for UG No Discrimination, No Mobbing, the Supreme Court of FBiH accepted the request, annulled the decision of the Cantonal Court in Tuzla and awarded the costs of the dispute incurred by this association due to the fight for access to information.

## Litigation and strategic litigation

During the year, TI BiH initiated **25** administrative disputes against institutions due to the incorrect application of the Law on Freedom of Access to Information at all levels of government. The courts issued **43** verdicts, of which **32** were in favor of TI BiH, while in the remaining **11** the claim was rejected, but further legal protection was initiated.

**9 requests for extraordinary review of court decisions were filed, and seven appeals were filed in the cases of the right to a legal remedy and the right of access to court, because the Court of BiH changed its practice and instead of considering the merits of appeals against CEC decisions, began to reject them as inadmissible.**

Important court decisions:

- The Court of Bosnia and Herzegovina has adopted a lawsuit related to the disabling of access to the Draft Law on the Court of Bosnia and Herzegovina by the Ministry of Justice of Bosnia and Herzegovina
- The Court of Bosnia and Herzegovina issued a verdict annulling the decision of the Prosecutor's Office of Bosnia and Herzegovina refusing to act on the request for access to information on the conduct of an investigation for

criminal offenses of corruption or criminal offenses against official or other responsible duty in the case of the Director of the Secretariat of the High Judicial and Prosecutorial Council, Admir Suljagić.

- The Cantonal Court in Zenica has accepted a lawsuit filed by TI BiH for an employee of the cantonal administrative body, who was denied access to information necessary for the resolution of the labor dispute.
- The fifth verdict of the District Court in Banja Luka was passed in favor of TI BiH, in the case of requesting access to the Concession Agreement for the construction of the Banja Luka-Prijedor highway.
- For the second time, the District Court in Banja Luka issued a verdict in favor of Transparency International in BiH, ordering the Government of Republika Srpska to submit to TI BiH the minutes of the sessions at which the Proposal of the Law on the Special Register and Publicity of the Work of Non-Profit Organizations and the Draft Election Law of Republika Srpska were determined.
- Two court judgments for the right to information on the concession of Poljane (Livno), where the Cantonal Court in Livno ordered the Government of Canton 10 and the Ministry of Economy to publicly explain the consideration of the annulment of the concession contract for the exploitation of groundwater.

A large number of initiated administrative disputes before the courts shows the systemic problem of improper application of the Law on Freedom of Access to Information at all levels of government.

### **Appeals to the Constitutional Court of BiH and proceedings before the ECtHR**

TI BiH sent 6 appeals to the Constitutional Court of BiH, and in 3 cases the appeals were drafted for the parties. **Two appeals** were filed for violation of the right to a fair trial and freedom of expression by the RS Supreme Court.

Transparency International BiH has also submitted to the Court of BiH two requests for the protection of the right to a trial within a reasonable time, in administrative disputes against the Ministry of Justice of BiH and the Prosecutor's Office of BiH. Although the Court of BiH is obliged to decide on the lawsuit within 60 days, **13 months have passed** without a court decision, which motivated TI BiH to react and formally request the acceleration of the procedure.

The European Court of Human Rights has taken into consideration **two applications** forwarded with the support of TI BiH. The first case relates to the disabling of access to information by the Federal Ministry for Veterans and Disabled Veterans of the Defensive and Liberation War – in this case, TI BiH represents the interests of citizens who have been denied access to the requested information.

The second case is an appeal by a long-time client of the Centre (M.Ž.), which was prepared by the legal advisors of TI BiH for violation of the right to a fair trial and an effective remedy (Art. 6(1) and 13 of the European Convention) in an employment dispute. The European Court of Justice has upheld both cases on the merits, which is an important step towards the potential protection of citizens' rights at the international level.

### **Institutional results – changes in internal regulations and practices**

TI BiH has also achieved direct institutional results - Institutions, in several cases, were forced to change their practices after the reaction of TI BiH.

- The Municipality of Centar Sarajevo amended the illegal provision of the Ordinance on Real Estate Records following the recommendation of the Ombudsman,
- The Court of BiH initiated proceedings in two cases in which no decision has been made for a full 13 months. In both cases, judgments were issued in which the complaints were upheld
- The Ombudsperson Institution sent a recommendation to the Public Institution Cultural Center Goražde due to the identified irregularities in the procedure of appointing the director, i.e. because the competition procedure was not conducted in accordance with the Law on Ministerial, Government and Other Appointments of the FBiH.
- The Supreme Court of the FBiH has adopted a request for an extraordinary review of the court decision by which the right to a fair trial was violated by

the Cantonal Court in Tuzla to a party to the Center for Legal Aid

- The Municipality of Centar Sarajevo, after providing legal assistance in the form of drafting a complaint, fully granted access to the information requested by the Sarajevo Open Centre, which was disputed
- The Parliament of the FBiH did not adopt the Proposal of Amendments to the Criminal Code of the FBiH, which plans to prescribe a new criminal offense of Unauthorized Publication and Display of Files, Portraits and Recordings.

These results show that legal assistance to TI BiH is not only a mechanism for the protection of individuals, but a powerful tool for improving administrative practices and institutional accountability.

### 3. IMPROVING TRANSPARENCY AND ACCESS TO INFORMATION

Throughout 2025, TI BiH has carried out a wide range of activities aimed at strengthening the transparency of institutions, improving the legal framework for access to information and increasing the accountability of the public sector to citizens. These activities include advocacy initiatives, analyses, legal interventions and direct support to the media, and the results achieved during the year show clear progress in several key areas.

One of the key steps in modernizing and simplifying access to information was achieved with the launch of the **PristupInformacija.ba platform**, which offers citizens easy submission of requests to all institutions in BiH, automatic generation of urgencies, reminders of deadlines and direct legal support to TI BiH.

A platform that includes addresses and contact information for 3.334 institutions at all levels of government in BiH, with relevant laws, recorded **52.482 visits by users who created 586 requests for access to information to public institutions using this tool.**

The platform was presented through a series of educational activities, including targeted campaigns, presentations for journalists, civil society organizations and institutions, as well as through video materials and practical instructions.

TI BiH has produced a comprehensive video guide detailing the process — from selecting an institution and submitting an application, to drafting an appeal and following legal deadlines — which is publicly available on TI BiH's YouTube channel. In addition, two short promotional videos have been published inviting citizens to exercise their right to access information. So far, the

campaign has achieved a significant reach of **1.699.003** views, of which **264.203** views on YouTube, **936.915** views on Facebook and **497.885** views on Instagram.

In addition, TI BiH continued to advocate for proactive transparency and openness of the decision-making process. At the conference "Open Government for an Open Society," recommendations for governments and parliaments to improve the transparency of decision-making were presented, which include the establishment of the obligation of timely and regular publication of documents accompanying the decision-making of governments and parliaments, the publication of agendas and draft decisions before and after sessions, the development and improvement of electronic tools and platforms for citizen engagement and public debate. Ensuring public participation in working groups for the preparation of laws, etc.

TI BiH has updated and **the overview of the level of proactive transparency** shows that despite visible progress at certain levels, serious improvements are still needed. Only **3** out of **14** governments publish decisions on their websites, while **4** cantonal assemblies still do not publish materials for sessions.

#### Advocacy at the Brčko District Level and Law Reforms

TI BiH has dedicated a special focus to the Draft Law on Freedom of Access to Information of the Brčko District. After a detailed analysis, TI BiH sent comments to the Brčko District Assembly and pointed out a number of shortcomings that were contrary to international standards. It was particularly problematic that the draft law abolished the right to appeal, and the only legal remedy for citizens would be to initiate an administrative dispute before the Brčko District Court, which would significantly increase costs and reduce the accessibility of rights.

In addition, TI BiH acted publicly demanding the facilitation of a public debate that was not foreseen, which resulted in the organization of a public hearing with the participation of the media and civil society, who had the opportunity to submit their proposals and comments in this way.

TI BiH participated in the public hearing, where it again pointed out the necessity of returning the appeal procedure and correcting other shortcomings. At the same time, legal support was provided to journalists and CSOs who wanted to submit comments on the draft law, which achieved a broad social mobilization around this issue. As a result of all these activities, **most of the comments of TI BiH have been considered and acknowledged**, and the Law on Freedom of Access to Information in Brcko District has been adopted, which prescribes the right to appeal against decisions rejecting requests for access to information, thus enabling applicants to have a faster and cheaper redress procedure.

### **Initiatives to improve the law at the entity level and BiH**

On the occasion of the International Freedom of Access to Information Day, TI BiH presented **a set of initiatives to improve the legal framework** that regulates access to information at the level of BiH and the entities. These initiatives include **the**

### **obligation to proactively publish data, improve the efficiency of proceedings and supervise the implementation of the law.**

At the round table organized in Sarajevo, which was attended by representatives of institutions, international organizations, media and civil society, TI BiH presented long-term findings on the non-compliance of domestic laws with international standards, and presented initiatives.

Special emphasis was placed on the obligation of public institutions to actively publish information of public importance, which would greatly reduce the space for corruption and relieve the legal system of a large number of FOIA cases. This was followed by coordination with other civil society organizations, in order to provide support and create a coalition of organizations that will jointly stand behind the TI BiH initiative, and increase pressure through advocacy.

The focus is also on strengthening civil society organizations, media, activists and citizens in the use of the law on freedom of access to information. Trainings were organized in Mostar, Bihać and Tuzla, as well as for students of the Faculty of Law in Sarajevo and CIN journalists, where over **80** participants improved their knowledge of access to information, and trainings were held for civil servants.

## 4. PUBLIC CONTRACTING AND RESOURCE PROTECTION

Public resource management in Bosnia and Herzegovina is one of the areas with the most pronounced risks of corruption, political influence and non-transparent decision-making. **Public procurement, concessions, management of natural resources and spatial planning** are a segment of the state system in which economic and political interests most often override the public interest. Examples from 2025 clearly show the patterns: lack of competition in procurement, favoring investors in concession procedures, inadequate control of the work of public companies, lack of public consultations, and weak or selective reaction of competent institutions.

During the year, TI BiH operated in four key areas: (1) supervision and intervention in public procurement, (2) supervision of concessions and energy projects, (3) analysis of forest and other natural resources management, and (4) protection of public space and urban planning. Interventions conducted in 2025 show how wide the scope for abuse is, but also how strategically focused research and legal initiatives can produce systemic results.

### Supervision of Public Procurement and Irregularities in Local Communities

During the year, TI BiH documented a number of irregularities in the implementation of public procurement, and in some cases elements of corrupt activities.

#### Procurement without the implementation of the procedure – PUC "Bašbunar" Travnik

- In Travnik, TI BiH determined that PUC "Bašbunar" concluded several contracts with a total value of at

least 114 in 2024.1000 miles, and without the required public procurement procedures. These contracts were concluded directly, with three private companies that had long-standing cooperation with the PUC.

- TI BiH requested the supervision of the Public Procurement Agency, pointing out that this is a typical avoidance of competition, that this practice is often associated with local networks of influence and informal partners of public companies, that without a public tender it is not possible to determine whether the funds were allocated at market prices.

#### The case of the Tourist Organization of the City of Banja Luka

TI BiH has documented that TO Banja Luka has distributed funds from sojourn taxes to non-governmental organizations without clear and measurable criteria, although there are strategic documents that define guidelines.

The members of the commission gave their assessments arbitrarily, at their own discretion, which poses a serious risk of abuse and favouritism. TI BiH requested the supervision of the Ministry, which stated that **the supervision procedure had begun** and that it would inform the applicant of the outcome of the same.

#### The "House of Respite" case in Banja Luka

One of the most significant and illustrative examples refers to the construction of the "House of Respite" facility. TI BiH determined that, despite the fact that the tender was formally completed in September 2025, a board with the name of the contractor was placed in October 2024 during the laying of the foundation stone at the construction site.

The existence of the plaque 11 months before the formal selection of the contractor indicates serious indications of favouritism and rigging. Such a discrepancy between the chronology of works and public procurement points to the possibility that the contractor was selected in advance, the existence of informal agreements before the tender, the absence of real competition and equality of bidders.

In this situation, TI BiH filed a criminal complaint against the responsible persons in the City Administration, emphasizing that such a practice not only renders the Law on Public Procurement meaningless, but also directly undermines public trust in institutions and the spending of budget funds.

#### **Public lighting in the City of Banja Luka**

(TIBiH) submitted a request to the Public Procurement Agency for monitoring the procurement procedure "Construction of public lighting in the city of Banja Luka according to the ESCO model", after it was noticed that one of the members of the group of bidders – the Belgrade-based company "Aviator Group" – submitted certificates of executed contracts for which publicly available data from Serbia indicate that they could not have been issued.

In addition to this, TI BiH also points out that the entire procedure, worth over 35 million BAM, should have been conducted as a public-private partnership project, and not as a classic public procurement of works.

By concluding this deal through a public procurement procedure, and not as a PPP, the City Administration of the City of Banja Luka has retained full control over the process of defining the terms of the tender, the process of selecting the most favorable bidder and the evaluation of the implementation of this job.

Because of all this, TI BiH asked the Public Procurement Agency of BiH to monitor the procedure and check whether the provisions of the Law on Public Procurement of BiH have been violated, and from the competent ministries to assess whether in this case it is actually a public-private partnership project that is exempt from the public procurement system. The detail that makes this procurement disputable is that the preliminary design and the feasibility study estimate the value of the works at about 13 million BAM with a deadline of 6 months. Despite this, the City of Banja Luka has envisaged repayment in 180 monthly installments (15 years) in the amount of more than 35 million BAM.

TI BiH documented that the **Tourist Organization of Banja Luka distributed** the funds from sojourn taxes on the basis of a public call, but without any clear and measurable criteria. Although there are strategic documents that point to the obligation to use certain parameters, the Commission, according to the findings of TI BiH, evaluated projects subjectively and without appropriate documentation.

TI BiH asked for the supervision of the line ministry, warning that this model of distribution of funds creates space for politically motivated selection, enables potential financing of close organizations, undermines trust in the system of sojourn taxes and the development of tourism. TI BiH requested the supervision of the Ministry of Trade and Tourism, which stated that **the supervision procedure had begun**.

**TI BiH also acted through advocacy for the improvement of the Law on Public Procurement.** After the presentation of the preliminary draft of the new Law on Public Procurement of BiH, and participation in the consultations, TI BiH submitted comments on the preliminary draft, pointing out that the amendments bring certain improvements, but still leave room for

corruption risks. It was warned that the law must be aligned with EU practices, and that full transparency of the entire procedure through the EJN system must be ensured, the involvement of CSOs, as well as independent control over exclusive rights and contract amendments, and the tightening of sanctions.

## **Concessions – non-transparency and favouring investors**

Concessions in the energy sector remain one of the riskiest areas in BiH. During 2025, TI BiH continued to collect data and monitor the granting of concessions, and identified several cases in which the procedures for granting concessions did not comply with the legally prescribed obligations of the public, consultations and supervision.

TI BiH continued to collect data on granted concessions in Bosnia and Herzegovina, analyzing data for 2023 and 2024. The competent offices of all cantons and entities in BiH were contacted with an inquiry about the granted concession contracts, and **the register of concessions in BiH** was [koncesije.transparentno.ba](http://koncesije.transparentno.ba) updated with data on 171 concession contracts that were concluded in the mentioned period.

The data include information on the competent authority, the concessionaire with whom the concession contract has been concluded, the conditions for awarding, the method of calculation and the amount of the current as well as the amount of the one-time concession fee for the assigned right, as well as other data such as location, annexes to the contract and dates of conclusion, and these data will, after a detailed analysis, be summarized and presented to the public as well as to relevant institutions and key decision-makers.

After entering the data on the granted concessions, the process of collecting data on paid concession fees for active

concessions that are currently in the register, over 760 of them, began. Of this number, TI BiH obtained data on the collection of concession fees in 2023 and 2024 for 599 **concession contracts that are currently active in BiH, and the total value of fees that have been paid is 101.523.173.54 KM.**

These data are certainly not final because many competent authorities refuse to provide data on collections, while the multi-layered structure of competencies and their overlap between competent authorities, regulators (commissions for concessions) and tax administrations prevents a comprehensive approach to the collection and summarization of this data.

## **Cases in the field of concessions**

TI BiH has initiated three administrative disputes against institutions that refused to provide information on concession granting procedures — the Ministry of Economy of Canton 10, the Ministry of Economy of Sarajevo Canton and the Ministry of Family, Youth and Sports of Republika Srpska. In all cases, the institutions tried to conceal documents on concession contracts, concession fees and investor selection procedures.

These cases are important because in practice it has been shown that concessions are the most non-transparent part of public resource management. Institutions often treat concession contracts as a "business secret" of investors, although the law clearly stipulates that it is a public good and that the public has the right to inspect all stages of the procedure.

### **The case of SE "Trebinje 1" – suspicious transfer of concession**

The documentation on the disputed transfer of the concession for "SE Trebinje 1" has been discovered and publicly published. Transparency International in BiH, after

several months of legal battle, [has obtained documents](#) from the Commission for Concessions of the Republic of Srpska, which reveal that the only proof of the technical equipment of the newly established concessionaire "SE Trebinje 1" – a company with three employees and 800 KM of revenue – was the written statement of the director Milutin Mastinović, while the project is worth 100 KM Millions of miles have been allocated without public bidding and invitations. On the basis of this, a case study was published, and the case received international coverage through the reporting of independent media such as Telex.hu which, on the occasion of Milorad Dodik's visit to Hungarian Prime Minister Viktor Orban, published an article in which he reminded of the study made by TI BiH and pointed out that strategic energy projects in BiH are being implemented under a veil of secrecy, which TI BiH persistently points out.

### **Bosnia and Herzegovina Concession Granting Policy Document**

Transparency International participated in the drafting of the BiH Concession Granting Policy Document, which is being prepared by the BiH Concession Commission, and in the organization of events with concession commissions and civil society organizations collecting comments for the Document.

### **Model cantonal law**

By analyzing existing regulations, identifying key shortcomings and opportunities for improvement, TI BiH has begun developing a model legislative framework for improved concession management, and the next steps will include its improvement through consultations and promotion through advocacy activities.

### **The Law on Concessions of Canton 10**

In 2007, [the Constitutional Court of the Federation of BiH](#) issued a decision

repealing the then Law on Concessions of Canton 10. Since all concessions have been without a legal basis since then, the Canton started drafting a new Law, and the associations operating in the Canton asked for the help of TI BiH in compiling comments on the preliminary draft and later on the draft law, in which TI BiH participated by giving concrete proposals, as well as support to local actors.

### **Expanding an effective front in the field of natural resource protection**

TI BiH held a series of consultations with organizations and activists operating in the field of concessions, which is a topic that is increasingly emerging as important in the minds of citizens in the context of abuses, human rights violations and corrupt activities. Meetings and joint work on improving the surveillance system is an important foundation for creating a broader coalition and network of organizations that can protect the rights of citizens and act to combat corruption, but also to harmonize advocacy activities.

As a continuation of these activities, TI BiH is organizing a workshop in mid-December where it will bring together representatives of institutions, civil society organizations and academia, where proposals for a **model cantonal law on concessions will be presented**, after which it will [advocate for their adoption through a coalition](#) in 2026.

### **Forest management**

During 2025, [TI BiH](#) significantly expanded forest monitoring activities in the Republic of Srpska, applying a new methodology for long-term supervision of planning, felling, afforestation, reclamation, financial flows and distribution of wood assortments. 13 forest holdings were asked for management plans, implementation reports, price lists, data on the quantities of wood cut and sold,

and financial records that have not been publicly available so far.

Based on the collected data, a new module of the transparentno.ba platform is being developed, which will enable the monitoring of annual harvesting, plans and financial indicators.

Analyses conducted in 2025 confirmed the system's profound structural weaknesses:

1. **"Forest Management in BiH: Legal Framework, Business and Political Impact" (January 5, 2025)**

The analysis provides a comprehensive overview of the legislative framework, the business performance of forest enterprises (2020–2023) and political influences. Problems of fragmentation, weak supervision, financial opacity and the absence of sustainable practices have been identified.

2. **"Consequences of the Non-Existence of the Forest Act in the CNT – Case Study" (January 3, 2025)**

The document shows that the legal vacuum in the CNT results in losses of about 10 million KM per year, uncontrolled exploitation and decision-making without a legal basis, which confirms the urgent need for the establishment of cantonal legislation.

The findings pointed to:

- **Political influence on the management of companies** - Data collected by a comparative analysis of registers under the auspices of the transparentno.ba platform (register of officials, Register of public companies, register of concessions with data on forest management that are not yet public) show that 88% of directors of forest companies and holdings have a

clear political connection, and that in RS 23 out of 27 Leader of the party. Such politicization has a direct impact on personnel decisions, planning and financial flows.

- **Poor planning and excessive logging in certain holdings** - A comparative review of planned and realized felling in several holdings indicates multi-year exceedances. Silvicultural work and investments in forest restoration remain minimal, as confirmed by the findings of previous financial audits.
- **favoring private companies in the distribution of wood assortments** - The submitted data show that several companies continuously receive the largest part of the highest quality wood. The lack of transparent bidding and the widespread use of negotiated procedures opens up room for favouritism.
- **Lack of transparency in the company's financial flows** - Several farms do not have up-to-date price lists, plans and reports, and some companies have refused or delayed the submission of the requested information. This confirms the systemic absence of public work in the sector that manages the most valuable natural resource of the Republic of Srpska.

### **I'd like to see you in the process of passing the FBiH Forest Act.**

The Federation of BiH has not had an umbrella law on forests for more than 15 years. During 2025, TI BiH conducted comprehensive research and advocacy activities with the aim of urgently adopting a new law.

#### **Analysis of the legislative vacuum**

TI BiH documented the fragmentation of the system into nine cantonal laws and the complete absence of laws in the HNC, which led to the inability to adopt forest

management bases, loss of budget revenues and illegal logging.

### Meetings with key decision-makers

At an advocacy meeting on September 30 in Banja Luka, MPs from the PDP and the People's Front announced the launch of an interpellation on the situation in the forest sector and a request to include the issue of forests on the agenda of the National Council of Republika Srpska. This is the first significant institutional shift after years of ignoring the problem.

### Creating an advocacy framework

TI BiH has created a set of proposals for interventions on the Preliminary Draft Law on Forests of FBiH that focus on strengthening surveillance, mandatory data publicity, depoliticization of cantonal companies and harmonization with EU standards, including EUDR.

A 15-year-old conference is planned<sup>12</sup> in Sarajevo, where recommendations and proposals for the improvement of the law in the FBiH will be presented, with a special emphasis on the adoption of the Law on Forests of the FBiH.

### Renewable Energy Sources (RES) – Institutional Vacuum and Reform Needs

TI BiH has concretized its approach to investigating corruption risks in the field of renewable energy sources, as part of which a case study was published that problematizes the construction and commissioning of the Ivovik Wind Farm, one of the largest investment projects in the field of renewable energy sources in BiH. The terms of the concession are written in such a way as to favor the concessionaire, and not the public interest, while the competent authorities have failed at every step: from the award of the contract, through supervision, to the final issuance of permits.

In addition, the whole process, which turned out to be non-transparent, took place under the auspices of a law that is unconstitutional, while the basic rights of citizens, such as the right to property, were violated by the institutions in charge of protecting them.

TI BiH organized three focus groups on RES, in Zenica, Mostar and Sarajevo with the participation of regulators, representatives of ministries, investors, civil society, local communities and cantons, as well as the professional public. The discussions revealed a number of structural obstacles that hinder the development of RES projects:

- lengthy and fragmented permitting procedures;
- A large number of people involved in the process,
- Unclear priority system for connecting to the network.
- There are no rules for merging smaller projects ("aggregation rules"),
- Lack of transparency in the investment process.

Based on the focus group analyses, TI BiH has developed a policy proposal that defines a number of reform measures to accelerate the energy transition, including:

- A single procedure for permitting.
- the introduction of clear criteria for connection to the network;
- The obligation to publish all key documents for renewable energy projects,
- Defining rules for the consolidation of smaller production capacities.

Based on the inputs from the focus group, TI BiH has formed policy principles that it will advocate in this area in the future. Policies will focus on advocating for the introduction of clear aggregation rules to prevent artificially splitting projects for the purpose of abusive incentives, the appropriation of

dynamic quotas and the circumvention of regulations.

Given that corruption risks have now shifted from an early stage to electricity distribution companies where queues are created to connect to the grid, the focus of the proposal is on **increasing transparency through digital public registers**, portals with queues and the publication of available capacities in the network. At the same time, TIBiH insists on the harmonization and coordination of legislation at all levels of government in order to reduce fragmentation and legal uncertainty.

### **Updating the database of public companies**

Data for the database of public companies in Bosnia and Herzegovina **have been collected and updated** on the basis of

financial statements collected from APIF and FIA – financial management agencies. The database currently contains data for the operations **of 463 public companies in 2024** and is a key resource for monitoring the public sector, especially from the point of view of the efficiency of public spending. There is no official database of public companies in BiH, so this resource is crucial for all researchers, academics, activists, media and key stakeholders in the process of creating policies that manage public companies.

Based on these data, TI BiH plans to create a series of media content (texts, press releases, info-graphics) on the topic of the business of public companies and the efficiency of public resources management under their control.

## 5. POLITICAL INTEGRITY

Political integrity in Bosnia and Herzegovina in 2025 remained one of the areas of the deepest structural weaknesses of the state system. The capture of institutions, electoral irregularities, the political management of independent bodies, the absence of sanctions, the non-transparent financing of political parties and systemic obstacles to detecting conflicts of interest continuously undermine public trust and slow down European integration.

That is why TI BiH has focused a significant part of its activities throughout the year on identifying and documenting violations of the law, monitoring irregularities in the practice of institutions, and intensive work with parliaments, media and international partners.

TI BiH's activities in 2025 were focused on systemic change — strengthening oversight, detecting patterns of abuse, and creating pressure for the lawful and accountable management of public functions.

### Research & Analysis

TI BiH has published **an analysis of the financing of citizens' associations** and foundations from public budgets for a period of several years, which included a total of 12.200 registered associations. The results indicated that at least 383 million BAM was allocated to associations from the budget of all levels of government in BiH, whereby a number of irregularities were identified that indicate serious risks of misuse of public funds.

The most alarming data from the analysis relates to the fact that more than 1.800 associations affiliated with political parties, either through leadership, membership, management structures, or formal ties. In this way, a network of parastatal

organizations has been formed, which are used as mechanisms for redirecting public money for political purposes, which directly undermines the integrity of the electoral process and fair competition among political actors. The analysis identified more than 100 associations whose management structures are dominated by party members or persons holding positions in several committees and commissions, indicating the existence of well-organized interest groups that function outside the formal flow of the political and institutional system.

Although the 2024 campaign formally ended at the end of last year, its monitoring and analysis took much longer. During the year 2025, TI BiH published a detailed **report on campaign financing**, which revealed a number of systemic irregularities and illegalities. By analyzing the financial statements of political entities and actual advertising during the campaign, TI BiH determined that at least 2.6 million BAM was spent on advertising and political promotion, without being reported to the Central Election Commission of BiH, which is a direct violation of legal obligations. This is one of the largest amounts of undeclared campaign financing ever documented in BiH.

### Irregularities in the electoral process

During 2025, TI BiH completed a detailed **analysis of 22 final verdicts in the case of election fraud in Dobož**. The analysis revealed deeply worrying patterns: voting instead of other voters, correspondence of votes for deceased persons, organized activities aimed at manipulating election results, a complete absence of sanctions despite proven guilt.

Although the courts established the facts, all 27 defendants were acquitted or received minimal sanctions. TI BiH presented these findings to the media, international partners and parliamentary committees, pointing out

that this level of impunity poses a threat to the very integrity of the electoral process.

In parallel, TI BiH prepared and conducted **observation of pre-election activities** in the framework of the early elections for the President of the Republic of Srpska in 2025, which included the development of a methodology for media monitoring, the engagement of observers in the field and the monitoring of the actions of the Central Election Commission of BiH. During the campaign, TI BiH **filed 10 complaints with the CEC for premature campaigns, hate speech, abuse of children for political purposes and use of public resources**, and based on systematic monitoring, it made estimates of campaign costs and the visibility of candidates.

The results of the monitoring showed a marked inequality in access to resources and media space. According to the estimate of TI BiH, by November 23, 2025, the election costs of candidates amounted to about 794.000 KM, of which the campaign of the SNSD candidates was many times more expensive – about 651.1000 KM, while the SDS candidate spent about 142 in the same period.000 KM.

Media monitoring also confirmed the strong dominance of the SNSD candidate in the TV and online space, while the SDS candidate did not have a single recorded paid TV ad on the monitored channels. Overall, the findings indicate a significant disparity in visibility and invested resources between candidates, which calls into question the equality of conditions in the electoral race and underscores the importance of strengthening oversight of campaign financing and compliance with electoral regulations.

On November 27, 2025, TI BiH publicly published a report and analysis of election trends, in relation to turnout and distribution of votes, in which it calls on the BiH Central Election Commission (CEC) to investigate

suspicious of electoral fraud in the early elections in the Republika Srpska entity. Based on the applied methodology – a combination of statistical turnout analysis, forensic verification of voting patterns and comparative analysis of results at polling stations – about 40 polling stations with unusually high turnout (in some cases over 80–90%), where the candidate of the ruling coalition won more than 80%, and in some cases more than 97% % of votes.

According to the estimate of TI BiH, the votes from these disputed polling stations – a total of more than 8.500 – could have been decisive for the final outcome of the election. The published report of TI BiH, as the first of its kind for early elections in 2025, represents a serious, empirically based analysis of the electoral process. The methods used – statistical analysis, forensic data processing, comparative review of election results and transparent documentation of irregularities – provide the basis for an urgent institutional response and the basis for possible legal and legislative measures.

The published report has caused a significant resonance in domestic, regional and international media and institutions, TI BiH has further strengthened its mechanisms of direct civilian oversight over electoral processes and put emphasis on the importance of maintaining the integrity of elections.

As a result of public pressure, where TI BiH also played a part of the role, **the CEC made a decision to initiate the procedure of determining electoral irregularities** and recounting votes at certain polling stations. In accordance with the results of the recount, the CEC made a decision at an emergency session to annul the early elections for the president of the RS at 136 polling stations in 17 constituencies, including Zvornik and Doboju with the largest number of polling stations.

## Complaints against the parties

Following the complaint filed by TI BiH ahead of [the 2024 elections](#), **the CEC punished the SNSD for non-transparent financing of the "Krajina Evenings" pre-election event.** The decision of the Central Election Commission of BiH, which imposed a fine on the party, confirms that public pressure and timely reports can materialize into concrete sanctions, although it remains unknown who actually financed the disputed event, which is just one example of non-transparent forms of financing the pre-election activities of political entities recorded during the monitoring of the [2024 Local Elections](#).

Based on the analysis of the financial statements of the parties, TI BiH **filed charges against seven political parties for receiving prohibited donations** from companies that do business with public institutions, which is a violation of the Law on Financing of Political Parties.

**A total of 10 criminal complaints have also been filed** with the competent prosecutor's offices about **suspicious appointments to polling stations.** Namely, the imposed amendments to the Election Law of BiH prohibit the presidents and deputy presidents of polling station committees from being persons who are in any way connected with political parties, nor that they were candidates in previous elections, and the CEC is responsible for their election and appointment.

After the public competition, TI BiH found hundreds of persons who were members, activists or sympathizers of political parties, or that they were candidates on behalf of certain political entities, and with the collected evidence of these claims, submitted them to the competent prosecutor's offices, because all of them had to submit certified statements that they were not in any way related to the parties or that they were candidates.

**Seven appeals have been filed with the Constitutional Court of Bosnia and Herzegovina** for violation of the right to legal remedy and violation of the right of access to court. Namely, the Election Law allows the right to object to voters and political entities, while it only gives everyone else the opportunity to take the initiative to conduct the procedure ex officio. Until the end of the [2024 campaign](#), the Court of BiH, as the second-instance body for election appeals, decided on the merits of the appeals of the TI BiH. However, towards the end of the campaign, the CEC began to declare that the initiator of the proceedings did not have the right to appeal ex officio, which the court accepted and rejected all appeals, although the Law on Administrative Procedure and the Election Law allow it, and the instruction on legal remedy in the challenged decisions of the CEC clearly states this.

## Digital Transparency Platforms – Odogovorno.st and Integrity Watch

During [2025](#), TI BiH, in cooperation with partner organizations, promoted two new digital platforms aimed at improving the transparency, accountability and integrity of public institutions. Both platforms were created in response to the need for more accessible, comprehensive and verified information that allows citizens, media and civil society to scrutinise the work of institutions and political actors.

The **Odogovorno.st platform**, developed in cooperation with partner organizations BIRN BiH and Why Not, is a tool that allows citizens and civil society organizations to monitor the work of institutions, political parties and public officials. The platform brings together a variety of data sets, including

- monitoring the work and efficiency of [55](#) public institutions at the state and entity levels,
- Risks of financing, management and operations of [26](#) political parties,

- Multiple Functions and Potential Conflicts of Interest of 473 Public Officials.

The second platform promoted by TI BiH during the year is **Integrity Watch Bosnia and Herzegovina**, part of a regional initiative aimed at strengthening integrity and reducing corruption risks in the Western Balkans and Turkey. The platform functions as an open data tool that enables the analysis of three particularly sensitive areas: political party financing, public procurement and asset declarations of elected officials. Through a clear interface, users can track cash flows, assess risks of abuse, detect potential conflicts of interest, and analyze relationships between donors, public contracts, and political actors

Through integrated information on the work of institutions and holders of public office, party financing, public procurement and asset declarations of officials, these platforms provide insight into areas susceptible to corruption and thus significantly improve the possibilities for monitoring and understanding public processes.

Thanks to the availability of structured and verifiable data, platforms are used as a key tool in advocating for evidence-based reforms, thus contributing to building a more accountable, open and integrity-driven public sector in BiH.

### Monitoring and reporting conflicts of interest

Over the course of the year, I have filed **13 complaints with the institutions responsible for the prevention of conflict of interest**. The findings included illegal appointments, incompatible functions, covert links of public officials to political structures, multiple functions and concentration of power, and failure to act by

commissions responsible for conflicts of interest.

The most significant cases from 2025 show how conflict of interest laws are systematically avoided, but also how timely interventions of TI BiH can lead to results.

#### The Tegelti Case – Political Influence and Evasion of Responsibility

Although the case originally began in previous years, **the year 2025** was marked by attempts by the BiH Commission on Conflict of Interest to avoid conducting the procedure, citing the alleged impossibility of retroactive application of the amendments to the law. However, TI BiH proved that the conflict of interest occurred before the amendments to the law, and that the old law must be applied to the case.

#### Incompatible functions in the Federation of BiH and RS – the cases of Kozadra, Ćosić and Vidović

Over the course of the year, TI BiH filed several complaints against public officials who at the same time performed functions that are prohibited by law.

Examples include:

- **Dijana Kozadra** – combining a managerial position and a public function,
- **Marija Ćosić** – incompatibility of political function and membership in administrative bodies,
- **Robert Vidović** – performing incompatible functions in public institutions.
- **Vikalo Edin** - a legal entity "ELVIK" doo Srebrenik, which is owned by Vikalo Edin - an elected representative/deputy in the Assembly of Tuzla Canton, and of which he is also the director, **in 2025** closed contracts with public authorities

financed from the budget in the amount of more than 5.000,00 KM.

- **At the same time, Nermin Bojčić** performs a function in a political party and was appointed to the position of a member of the Supervisory Board of JP "Ceste" FBiH doo Sarajevo, which is prohibited by the Law on Ministerial, Government and Other Appointments of FBiH). The application has been submitted to the FBiH Government, which makes these appointments.
- **Boris Trninić** - Incompatibility in accordance with the Law on Civil Servants of Republika Srpska. Boris Trninić simultaneously performs the function of the Director of the Republic Civil Protection Administration of the Republic of Srpska and the function of an elected representative/councilor in the Municipal Assembly of Bratunac.
- **Zoran Mikulić** and Faruk Kapidžić - simultaneously perform the public function of a member of the Commission to Preserve National Monuments of BiH, and the public function of an elected representative/representative in the Assembly of the Sarajevo Canton, i.e. the Assembly of the Herzegovina-Neretva Canton. Report submitted to the Commission for Deciding on Conflict of Interest in Institutions at the BiH Level for Violation of the Law on Conflict of Interest in Government Institutions of Bosnia and Herzegovina
- **Nikolina Šljivić** is simultaneously employed as a civil servant in the Republic Administration for Geodetic and Property Affairs, and performs the function of an elected representative/MP in the National Council of Republika Srpska. At the same time, it is also self-employed. All of the above is prohibited by the Law on Civil Servants of the Republic of Srpska, and a report has been sent to the Administrative Inspection and the CEC of BiH.

- A complaint has been filed with RAK against **Vjekoslav Cerkez**, a member of the Council of the Communications Regulatory Agency (RAK) of BiH, due to conflict of interest (employed by HT Eronet).

Through these cases, TI BiH has pointed out that the incompatibility of functions is not just a technical issue, but a symptom of a structural problem of institutional capture — public companies and oversight boards are often used to distribute political influence and reward loyalty.

Of the additional examples, the following stand out:

- **Jasmin Dervić**, a councilor in the Cazin City Council and president of the Supervisory Board of JP Una National Park, **submitted his irrevocable resignation after the application of TI BiH** due to conflict of interest.
- I'm also looking forward to seeing new contracts with **the Isak family**. The company DHD d.o.o. Zenica, owned by the wife of FBiH MP Arnel Isak, continues to receive lucrative jobs from the budget, despite the prohibitions from the current Law on Conflict of Interest in FBiH Authorities, and TI BiH has requested a statement from the Ethics Committee of the FBiH Parliament, which, according to the Code of Ethics, can impose sanctions on a representative in case of conflict of interest, but this body has not been active since 2013. when the U.S. Senate was discontinued in that area. As a result of institutional silence, family businesses of public officials are unhindered in obtaining state jobs.
- Upon the request for entry in the Register of Business Entities of the change of the authorized person for the representation of the Public Company "RS Motorways", which requested the registration **of Radovan Višković** as

Acting Director, TI BiH submitted to the competent District Commercial Court the information that, according to the Law on Public Companies, a person who performs an executive function in a political party cannot be appointed as a member of the Management Board, and that according to the Law on the Prevention of Conflict of Interest in Public Authorities, executive office holders cannot be directors of public companies for three months after the termination of public office. According to the Law on Registration of Business Entities in the Republic of Srpska, the competent registration court is obliged, upon receipt of the application, to examine and determine whether the conditions for registration in the court register have been met, and to make a decision on registration in the court register.

- **Dženan Šečerbajtarević** was appointed to the position of a member of the Commission for Deciding on Conflict of Interest in Institutions at the level of BiH, which is a public function within the meaning of the Law on Prevention of Conflict of Interest in Institutions at the level of BiH (appointed person by the Parliamentary Assembly of BiH), and at the same time performs the function of a police officer, while Article 38 of the Law on Conflict of Interest in Institutions at the level of BiH The Law on Police Officers of Bosnia and Herzegovina stipulates that a police officer *cannot hold any public office, so Mr. Dženan Šečerbajtarević could not be appointed as a member of the Commission for Deciding on Conflict of Interest in Institutions at the BiH Level. In accordance with the Law on Ministerial Appointments, Appointments of Councils of Ministers and Other Appointments of BiH, an objection to this appointment is filed with the Parliamentary Assembly of BiH and the Human Rights Ombudsman, as well as the*

*Independent Committee of the Parliamentary Assembly of BiH.*

- **Sevlid Hurtić**, Minister of the Ministry of Human Rights and Refugees of Bosnia and Herzegovina, through the legal entity NAM" Ltd. for publishing, trade and services Tuzla, which he owns, has a financial interest in the legal entity "Suton print" doo Široki Brijeg which operates *with* a body financed from the budget, in this case the Ministry of Education and Science of Tuzla Canton in the amount of more than **10.1000** miles per year. The report was submitted to the Commission for Deciding on Conflict of Interest in Institutions at the BiH Level for violation of Article 7, paragraph 2 of the Constitution of Bosnia and Herzegovina. Law on Conflict of Interest in Government Institutions of Bosnia and Herzegovina

## Cooperation with anti-corruption bodies

In order to improve cooperation with anti-corruption bodies in BiH, TI BiH organized a coordination meeting to discuss the current work and challenges related to the work of anti-corruption offices and bodies. As concluded at the meeting, one of the key challenges in the work of the body is the entry into force of the new Law on Personal Data Protection, and in accordance with the conclusion of the meeting, TI BiH asked AZLP to hold a joint meeting with the bodies and offices for the fight against corruption in order to eliminate doubts in their work.

TI BiH monitored **the development and adoption of the strategic framework for the fight against corruption**, given that during **2025**, the governments of the RS and the Brčko District of BiH adopted their strategies, while the Government of the FBiH formed a team for the development of the strategy at the level of this entity. During the monitoring, a lack of coordination and harmonization was noticed, as lower levels of

government are obliged to harmonize their strategic framework with the state one. Most of the measures from the state strategy, which envisages the engagement of entity institutions, are not addressed in the strategy in RS.

This process proves the lack of work of the APIK on the coordination of anti-corruption bodies and processes in the country. The strategic framework at the cantonal level is also uneven, as the cantons are in the process or have already adopted new strategies, without a new strategy at the FBiH level, which is particularly controversial in the context of reforms in areas where the entity and the cantons have shared competencies. TI BiH offered expert support to the Anti-Corruption Team of the FBiH Government in the process of developing the strategy.

### **Advocacy and monitoring of the work of institutions**

TI BiH has publicly reacted to the **proposal of the Law on Financing of Political Organizations of Republika Srpska**, warning of the collapse of the institutional order and the legalization of corruption.

#### **Law on Conflict of Interest of the FBiH**

Throughout the year, TI BiH exerted public pressure and pointed out the need to adopt laws at the FBiH level. This also included initiating meetings with the competent institutions, primarily the Ministry of Justice of the FBiH as well as the Parliament of the FBiH, in order to encourage the referral of this law to the procedure. In addition to the initiatives sent to the Government and Parliament, TI BiH has established coordination with members of the House of Representatives of the Parliament of the FBiH, as well as representatives of relevant international institutions, on the creation of the Draft Law on the Prevention of Conflict of Interest in the FBiH.

In cooperation with several MPs, TI BiH has analysed the previous proposals, refined the proposals, organized a coordination meeting with representatives of different parliamentary groups in the Parliament, and advocated for the submission of the draft to the procedure.

#### **Law on Conflict of Interest of BiH**

Since the establishment of the State Commission for Conflict of Interest, TI BiH has been the only civil society organization that has continuously monitored its work, regularly attended sessions and informed the public about irregularities and inconsistencies in the application of the law. Although the Commission was formed a year ago, it has still not made any decisions under the new law, and no bylaws have been adopted. Despite attending sessions, TI BiH often had to rely on requests for access to information to obtain official data, as the materials and agendas of the sessions are not published. At the same time,

TI BiH filed a complaint with the Parliamentary Assembly of BiH and the Ombudsperson Institution due to irregularities in the appointment of Dzenan Šečerbajtarević, pointing to the violation of the Law on Ministerial, Government and Other Appointments and an obvious conflict of interest due to his simultaneous employment in SIPA.

Through direct monitoring and public pressure, **TI BiH contributed to the fact that during October and November 2025, the Commission finally starts making decisions in cases** that have stood unresolved for years, applying the previous law. One of the first cases in which a sentence was imposed was related to Minister Sevlid Hurtić, after the TI BiH reported, while at the same time filing a new report for trying to circumvent legal restrictions. On the other hand, after three years, the Commission dismissed the

complaint against Milorad Dodik due to a conflict of interest, which further pointed to the problem of slow action and selective application of the law.

In several cases, the conflict of interest has ceased in the meantime because the reported holders of public office no longer hold office, so sanctions cannot be imposed on them, which renders meaningless the very postulate of preventing conflict of interest and sends a message that delaying the procedure can avoid consequences.

In its reports and public reactions, TI BiH warned that the absence of bylaws, ignoring the recommendations of EU-funded international experts and announcing the exclusion of the public from sessions, while limiting transparency to selective publication of documents, seriously undermine trust in the mechanism for preventing conflicts of interest.

That is why TI BiH emphasized the need to ensure timely and consistent sanctioning of conflicts of interest, especially upon reports, with full respect for the principles of publicity, so that this mechanism would really have a preventive and deterrent effect on public office holders.

### **Employment in the public sector**

An analysis of **Responsibility and Integrity in Employment was made**, as well as a proposal for a new model of supervision over employment processes. The new model was presented at the 13th Conference. **3.2025.** Fair and Transparent Employment, which was attended by over **70** representatives of various institutions and organizations.

A new model of supervision in employment was also presented in the Offices/Teams for the Fight against Corruption of the USC, TK, Canton **10**, BPK and SBK. The Anti-Corruption Office of the USC and the Ministry of Health, Labor and Social Policy of the USC have been

sent an initiative to improve the Decree on Employment in the Public Sector of this Canton. **The initiative was adopted by the line ministry** and the participation of TI BiH and the Office in the working group that was never established due to political instability and changes in the Government was announced.

The Anti-Corruption Team of Canton **10** has expressed its readiness to include measures related to the improvement of supervision in employment in the new strategy. In addition, the aim of the visit was broader advocacy activities in order to analyze the situation in the offices, and what are their next steps and goals.

At the end of April, the cantonal governments in the FBiH were presented with the concept and methodological approach for **conducting a functional review of public administration**. The concept of the functional review of public administration is focused on improving the efficiency of public administration, and envisages a detailed analysis of the competencies of the cantons, an analysis of the resources available to the cantons, and provides recommendations for the improvement of processes and optimization of management. Representatives of cantonal governments, as well as representatives of institutions from the state and level of the Federation of BiH, agreed that it is necessary to conduct a functional review of the organization of public administration in cantons, and that it is recommended to implement this model in order to improve efficiency and improve the quality of public service provision.

In addition, it was concluded that it is necessary for the cantons to participate in the strategic planning of public administration, to improve coordination between all levels of government.

### **Education and capacities**

A two-day training for civil society organizations "Monitoring of local authorities and anti-corruption initiatives" was held in cooperation with BIRN BiH. A public call for non-governmental organizations for the fight against corruption has been announced, with a plan for the allocation of sub-grants in the amount of 4.000 to 12.000 EUR.

### **Coordination of international actors - strengthening a common response**

During 2025, TI BiH organized a special consultative meeting with representatives of the EU Delegation, the Council of Europe, the OSCE, the Twinning project and the embassies of several countries (UK, USA, Denmark, the Netherlands, Sweden, Switzerland). The aim of the meeting was:

- identification of pressing problems in the fight against corruption,

- coordination of the activities of international actors and domestic organizations,
- exchange of information on planned activities,
- Joint monitoring of the implementation of key reforms.

The participants agreed that this model of coordination is extremely useful and that such meetings will be organized periodically to ensure continued cooperation.

One of the topics identified as a priority is **the uneven application of the Law on Personal Data Protection**, especially in the context of anti-corruption policies and the publication of information on the spending of public funds. Institutions often abuse the Law to hide data on public procurements, contracts and officials, which TI BiH continuously challenges through legal mechanisms.

## 6. JUDICIARY

In this period, TI BiH continued to work on researching the transparency of judicial institutions, the quality of published data, the disciplinary responsibility of judicial office holders and the prosecution of corruption cases.

### Judicial Transparency Index

In cooperation with BIRN, TI BiH has updated and expanded the Judicial Transparency Index, which includes courts and prosecutor's offices at all levels in BiH. While there has been an improvement in certain areas compared to 2023, there is still room for improvement. Still, 45% of prosecutor's offices publish complete indictments, while courts and prosecutor's offices continue with the practice of treating requests for access to information sent by citizens differently compared to requests sent by TI BiH, where almost every third request of citizens is completely ignored.

The findings show that a large number of institutions do not publish even basic documents—such as budgets, annual plans, statistical reports, or disciplinary decisions—which further complicates public scrutiny. A particular problem is the fact that many courts do not publish judgments in accordance with anonymization standards, which is a serious obstacle to investigative journalism, but also to the academic community.

The findings of the analysis were presented at a conference held in March 2025. Over the years, they have been promoted through TI BiH's social media channels through infographics.

### Prosecuting Corruption – Interactive Map

The interactive map of corruption prosecution by TI BiH has been updated with

data for 2024, and findings related to the efficiency of corruption prosecution by courts and prosecutor's offices in BiH have been promoted. The findings show that prosecutors' offices in BiH have not shown progress when it comes to the fight against corruption, and during 2024. The number of orders for non-investigation increased by 6.2% compared to the previous year, and at the same time the number of investigations for corruption crimes decreased. Also, the number of open investigations has decreased by as much as 15%, while the number of indictments is at the lowest level in the last four years.

Also, every third investigation ended with a shutdown, which best illustrates the results of the work of the prosecutor's office. Some cantons, such as West Herzegovina, Posavina, Canton 10 and Goražde Canton, and the Brčko District Prosecutor's Office stand out in particular because during 2024. They did not have a single indictment for high corruption.

The penal policy is not tough enough and shows mitigation trends. As many as 51.5% of final convictions for corruption crimes are suspended sentences. The findings were presented at a conference in March 2025 and were promoted through TI BiH's social media channels.

### The Integrity of Judicial Officers

TI BiH also published [an analysis of the disciplinary responsibility of judicial office holders](#), which showed that a system that would guarantee the real responsibility and integrity of judicial office holders has not yet been established.

**TI BiH has informed the HJPC BiH about the existence of a risk of conflict of interest in the procedure for the election of the Director of the HJPC Secretariat.** TI BiH pointed out that she is a member of the commission in charge of conducting the

public competition and at the same time the secretary of the Ministry of Justice of BiH, while the best-ranked candidate is employed as the head of the minister's cabinet in the same ministry, which represents an obvious risk of bias in the appointment process. TI BiH requested that these circumstances be taken into account before making a final decision on the appointment, in order to ensure the legality, impartiality and integrity of the entire competition procedure.

### **Advocacy for the Law on HJPC**

Throughout the period, TI BiH has been dedicated to advocating for the improvement of the Proposal of the Law on the High Judicial and Prosecutorial Council. At the conference in March 2025, the new Law on the HJPC was discussed, as well as the opinion on the preliminary draft law on the HJPC published by the Venice Commission.

The event reiterated earlier **proposals of the HJPC for clear criteria for the selection of HJPC members, prioritizing qualifications over ethnicity, preventing conflicts of interest through stricter provisions and sanctions, and establishing effective asset verification mechanisms** that include the mandatory declaration of assets of close relatives, including those who do not live in the same household.

Furthermore, **TI BiH drafted amendments** to the Proposal that was in the parliamentary procedure, coordinated with representatives of the judicial community, the EU, and organized a series of meetings with representatives in the Parliamentary Assembly of BiH, in order to provide support for the referral and adoption of amendments. In addition to a series of individual meetings with representatives of several parliamentary parties (SDP, SDA, PDP, NIP, NES, For Justice and Order, etc.), a joint meeting with MPs was also held.

In this context, some parliamentarians expressed their readiness to submit amendments, and the direct **result was the first postponement of the adoption of the mentioned proposal at the Constitutional and Legal Committee of the PD of the Parliamentary Assembly of BiH, and then the return of the proposed law to the Ministry of Justice for refinement.**

Following the withdrawal of the law from the parliamentary procedure, the BiH Ministry of Justice and the HJPC formed an operational working group to harmonize the draft law with the previously submitted amendments. However, the work of this working group has remained completely non-transparent and closed to the public. Despite multiple inquiries and requests for access to information submitted by TI BiH, the HJPC sessions at which this issue was discussed were regularly closed to the public, without any specific information on the course of work and the content of the changes.

During the further process of public consultations on the e-platform of the Ministry of Justice of BiH, **TI BiH submitted detailed amendments to the Draft Law on the HJPC**, warning that the existing text consolidates permanent ethnic quotas contrary to the recommendations of the Venice Commission, retains political influence in the process of electing HJPC members, and provides for weak mechanisms for the prevention of conflicts of interest and verification of assets. TI BiH assessed that the proposed draft does not bring substantial improvements to the integrity of the judiciary and asked for its fundamental refinement before the continuation of the legislative procedure.

Despite this, the Draft Law on the HJPC was sent to the BiH Council of Ministers before the formal conclusion of the public consultations, ignoring the basic principles of transparency and participatory regulation, and the recommendations of the Venice

Commission and key amendments by civil society organizations remained largely unimplemented.

### **International Consultation and Coordination**

To increase pressure, TI BiH organized a consultative meeting with representatives of the Delegation of the European Union, the OSCE and the embassies of Denmark, the Netherlands and Sweden, which confirmed that the existing draft law contains serious shortcomings that threaten the independence of the judiciary, including the permanent introduction of ethnic quotas, political influence on appointments, and weak integrity and asset verification mechanisms. It was agreed to strengthen continuous international coordination through regular exchange of information and periodic consultative meetings with the aim of jointly monitoring the reform process. In addition to meetings with international actors in BiH, TI BiH held consultative meetings on this law with representatives of the European Commission, i.e. the Directorate-General for Enlargement.

### **Monitoring the work of the Department for the Implementation of the Report Procedure**

TI BiH held a consultative meeting with external expert Anette Milk as part of the activities of monitoring the work of the HJPC Reporting Procedure Department. During the meeting, the key challenges in the functioning of this department were

discussed, as well as the methodology of further monitoring.

In the coming period, TI BiH will intensify the monitoring of the work of the Department for the Implementation of the Procedure on Reports, bearing in mind that its establishment was delayed by almost two years in relation to legal obligations, and that the Department formally started its work only in June 2025, while the actual operational capacity was established only from September, when the first eight positions out of a total of 17 were filled anticipated by systematization. Such a start of work, with serious personnel limitations, has already raised the question of the independence and efficiency of the Department's activities, especially in the context of challenging the legality of the forms for declaring assets and interests and delays in the application of verification mechanisms.

A special focus of TI BiH monitoring will be placed on the transparency of reporting and public disclosure of data, including the clarity, completeness and availability of published findings from the procedures for verifying the assets and integrity of judicial office holders.

In addition, TI BiH will continuously identify irregularities and problems in the work of the Department, and based on the collected findings, formulate specific recommendations for improving its efficiency, independence and overall transparency.

## 7. PROTECTION OF PUBLIC SPACE AND HUMAN RIGHTS

### Advocacy

The protection of public space, human rights and dignity of citizens during 2025 has become one of the key areas of activity of TI BiH. The social and political context is marked by increasing pressures on citizens, activists, journalists and civil society organisations, including:

- frequent SLAPP lawsuits aimed at silencing critical voices,
- attempts to introduce restrictive laws such as the criminalization of defamation,
- initiatives reminiscent of the models of 'foreign agents';
- non-transparent spatial planning procedures,
- institutional silence in the face of threats and attacks on activists.

In this environment, TI BiH acted as a protective mechanism for citizens and communities that most often do not have access to legal support or the ability to oppose abuses by government and investors.

It was also constantly advocated for the prevention of further adoption of harmful laws in the RS and the violation of the constitutional order, as well as the preservation of civic space, especially when it comes to the adoption of the Law on the Special Register and the publicity of the work of non-profit organizations. From the very beginning, TI BiH has actively pointed out the harmful consequences of this law, pointing out that its purpose was not to improve transparency, but to try to limit the activities of organizations dealing with the fight against corruption, misuse of public resources and the protection of independent media.

In addition to public reactions, coordination with other organizations, representatives of TI BiH held a series of meetings with relevant international institutions and organizations – the findings and recommendations of TI BiH were presented twice at the meeting of EU members and the donor community in the EU Delegation; A series of presentations were held at events in Strasbourg, Brussels, before the European Commission, human rights rapporteurs, the Commissioner for Human Rights, etc., and a series of meetings with rapporteurs and special representatives of Germany, Great Britain and other countries, as well as with EU parliamentarians, and other relevant international actors.

In addition, written comments and appeals were sent to all the aforementioned institutions, in order to strengthen international pressure to prevent the adoption of this law.

TI BiH had a significant presence on these topics not only in domestic but also foreign media, such as the Financial Times, the Times of London, the television of Sweden, ARD television from Germany, as well as in the media in the region.

The initiative was sent to the Constitutional Court, as a consequence of the cooperation and coordination of the TI BiH and the member of the Presidency of BiH who is the official proposer of the initiative, who made it on the basis of the proposal of content prepared by the member of the Board of Directors of TIBiH, Miloš Davidović. **The Constitutional Court of BiH has issued a decision declaring the Law on the Special Register and Publicity of the Work of Non-Profit Organizations unconstitutional and repealed.**

This decision confirmed that the provisions of the law, which introduced stigmatizing labels of "foreign agents" and restricted the fundamental rights to freedom of

association and expression, were contrary to the BiH Constitution and the European Convention on Human Rights.

## Support for citizens' initiatives

In 2025, the ["For the Plan" initiative in Banja Luka](#) has become one of the leading examples of resistance to non-transparent urban practices in local communities. Citizens opposed the attempt to adopt spatial planning documents that would enable the repurposing of public and green space without adequate discussion, without the publication of documents and contrary to strategic spatial policies.

TI BiH provided comprehensive support to the initiative through:

- **legal analysis** of draft spatial planning documents and identification of illegal provisions,
- **communication support** – preparation of messages, public responses and education of citizens,
- **analytical support** – determining deviations from legal and strategic obligations,
- **Logistical and organisational support**, including support in organising public events, collecting signatures through citizens' initiatives, coordinating with local initiatives and making information available to citizens.

The result of these activities was the creation of strong public pressure and the cessation of accelerated procedures that threatened the degradation of central city areas without public participation.

### Solar power plants in Nevesinje

TI BiH was approached by farmers and locals from Nevesinje regarding the intention of the municipality and the Government of Republika Srpska to give agricultural land

under concessions for solar power plants, fearing that they will be left without quality land for growing livestock and vegetables. Communication support was requested in terms of collecting relevant data, assistance in the implementation of the petition, public reactions and the announcement of the government's intentions.

### The Right to a Healthy Environment – The Kupres Case (Magnesium Mine)

TI BiH has initiated the procedure for the protection of the collective interests of the citizens of Kupres, where the exploitation of magnesium is planned without clear and transparent environmental impact studies and without the involvement of the local community.

The analysis of TI BiH showed:

- serious risks to water resources and the ecosystem;
- In the absence of public hearings,
- lack of transparency of investors and lack of key information,
- underestimating the environmental and social consequences of the project.

TI BiH submitted initiatives to the competent institutions, requested the suspension of the procedure and informed the citizens about their rights. This case has become an example of how small communities face high-impact projects without adequate institutional protection.

In cooperation with the locals and the Atelier for Social Change, TI BiH consulted lawyers and began collecting relevant documentation for the lawsuit for the protection of collective interests.

### Protecting whistleblowers and strengthening corruption reporting mechanisms

In May of this year, TI BiH sent proposals and comments to the Federal Ministry of Justice on **the Draft Law on Whistleblowers in FBiH** in order to further improve and improve the Draft Law, and in the future to ensure effective legal protection for whistleblowers in the Federation of Bosnia and Herzegovina.

Proposals have been sent to the Ministry of Justice of BiH for the harmonization of the planned **Law on the Protection of Persons Reporting Corruption in the Institutions of BiH** with the international legal framework related to the specific area. The proposals concerned the right of "whistleblowers" to choose to report irregularities inside or outside the institution, including the ability to address the media without fear of reprisals, eliminating the possibility of "good faith" reviews, and ensuring that institutions act effectively in situations where "whistleblowers" suffer adverse consequences.

Within the Council of Europe's "Horizontal Facility" program, TI BiH has conducted specialized trainings for lawyers on whistleblower protection, including:

- the application of the EU Whistleblower Protection Directive,

- legal standards and jurisprudence,
- typical forms of retaliation and protection mechanisms,
- steps in institutional and judicial representation.

I'll do it in **2025**. **It also provided advisory support in a number of individual cases of public sector whistleblowers**, especially in cases related to irregularities in the financial operations of public institutions.

### **Comments on regulations and protection of the public interest**

Over the course of the year, I'd like to make some brief comments on two key issues:

- **Draft Law on Labor in the Institutions of BiH**, pointing to the deterioration of employee protection and violation of international standards,
- **amendments to the VAT Rulebook**, in which a violation of the hierarchy of legal regulations and the risk of fiscal abuse were identified.

These interventions show how TI BiH contributes to preventing the adoption of regulations harmful to workers and the general public.

## 8. STATE CAPTURE

During the previous period, TI BiH developed a methodology for measuring **the State Captivity Index**, a tool that measures the degree of captivity of institutions, policies and decision-making processes by political and other interest groups. The methodology measures how and to what extent the interests of narrow political-economic networks influence decision-making, the allocation of public resources, access to justice, public policies and the rule of law.

The results of the measurements have shown that the capture of the state in BiH has elements of systemic multidimensionalism, through entrenched political clientelism as a key manifestation form. Political parties, as the key generator of state capture, exercise control over the distribution of public resources, thus relativizing the functionality of the key mechanism of political responsibility – the electoral process. The decision-making process is essentially non-inclusive, and often represents a mere formal-procedural framework for the transfer of particular interests of political parties into formal decisions.

The dominance of political parties is strongly manifested through the instrumentalization and dysfunction of the accountability system, making it impossible to prevent, detect and sanction abuses, making impunity widespread.

The State Captivity Index report, as well as a web platform with key indicators and findings, are scheduled to be presented at a conference marking December 9, the International Anti-Corruption Day.

### 30 years after Dayton.

In order to mark the 30<sup>th</sup> anniversary of the signing of the Dayton Peace Agreement, TI BiH, in cooperation with authors Boris Divjak and Srđan Blagovčanin, has prepared an analysis entitled "**30 years since Dayton - Building a Captive State**" as a critical review of this period of development of BiH. The analysis thematizes the development path of BiH from the end of the war to the present, focusing on the process of building the state and institutions, and then on efforts aimed at their strengthening and gradual Europeanization, in the context of the challenges of establishing good governance and the fight against corruption.

The results of the analysis show that even three decades after the end of the war, BiH has not been able to find an internal consensus for the establishment of a functioning state. Overcoming the consequences of war, among other things manifested in the power sharing model, persistently pulls the country from a hybrid to a regime with increasingly pronounced authoritarian tendencies. The situation in the country has been recording negative trends over a long period of time, according to almost all indicators, from the level of democratic standards, the rule of law and human rights, to very slow economic development.

The public presentation of the analysis is scheduled to take place on the 11<sup>th</sup> December 2025. As part of the celebration of 25 years of existence and work of TI BiH in Bosnia and Herzegovina.

## 9. EU INTEGRATION

The process of European integration of BiH in 2025 took place under extremely unfavorable political conditions, which affected the transparency and inclusiveness of the process, including the drafting and adoption of the most important reform laws. In this context, TI BiH has acted as one of the key actors of civil society whose analyses, data and public appearances have been recognized and used in the reports of the European Commission, by international partners, the media and some institutions in BiH.

This engagement was particularly important at a time when pressure was growing to meet the remaining reform requirements for obtaining a date for the opening of negotiations as quickly as possible, primarily the adoption of the law on the HJPC and the Court of BiH and the appointment of the Chief Negotiator. The process of appointing negotiators took place in an uncoordinated manner, through parallel procedures in the Council of Ministers and the Parliamentary Assembly of BiH, with the de facto exclusion of the BiH Presidency and without a clear clarification of the role of the dysfunctional coordination mechanism in future negotiating structures.

In its advocacy activities, TI BiH used the recommendations from the analysis of the coordination mechanism through the prism of constitutional law developed in 2024, pointing to the need for a constitutionally based, stable framework for conducting negotiations.

Together with the coalition of Initiatives for Monitoring European Integration of BiH, TI BiH has positioned itself as an actor that insists on principles for the participation of civil society in negotiations based on the expertise, experience and proven results of organizations, and not just formal

involvement without real influence on processes.

### Regional and international engagement of TI BiH

During 2025, TI BiH intensified its presence at the regional and European level through meetings, consultations and forums with representatives of the European Commission, the European Parliament, the Council of the EU, Member States' embassies, specialized working groups in Brussels, regional organizations and partners from the Western Balkan countries.

The representative of TI BiH met with Marta Kos several times, including within the new format of the Implementation Dialogue with Civil Society, where an assessment of the state of the rule of law, systemic corruption and institutional capture was presented, with precise recommendations for reform interventions in BiH and the approach of EU institutions to these processes, which should be based on quality and merit.

TI BiH, together with partners from the Initiative for Monitoring European Integration of BiH, participated in an advocacy visit to Brussels, where the review of civil society on key reform processes and the broader socio-political context was presented, as well as proposals for meaningful involvement of civil society in decision-making. Meetings were held with the offices of Enlargement Commissioner Marta Kos and High Representative for Foreign Affairs and Security Policy Kaja Kallas, members of the Council of the EU's COWEB Working Group, the European Parliament's Shadow Rapporteur and Rapporteurs for BiH and representatives of the Directorate-General for Enlargement.

TI BiH coordinated civil society organizations in the preparation of comments and proposals for amendments to the European Parliament Resolution on BiH, adopted in July

2025, whereby all submitted comments were included in the final text of this document. In parallel, TI BiH has prepared comments and proposals for amendments to the European Parliament's report on the enlargement strategy.

In both documents, TI BiH particularly emphasized the necessary reforms in the area of the rule of law, with a focus on the fight against corruption and strengthening the position of civil society in negotiation structures and decision-making processes.

In addition to these activities in Brussels, representatives of TI BiH met during the year with members of the European Parliament's Committee on Foreign Affairs, Constitutional Affairs, Security and Subcommittee on Human Rights, with representatives of the European Commission, the Council of the EU and the European Economic and Social Committee, as well as with parliamentary committees and ministries of foreign and European affairs of EU Member States.

Within the Berlin Process, the representative of TI BiH was a civil society rapporteur in the field of good governance, and prepared regional reports and recommendations that were presented to the European institutions and participating countries at the Leaders' Summit in London.

Through these processes, TI BiH has further strengthened its position as a relevant source of information on the state of the rule of law and the fight against corruption in BiH, which was also reflected in the invitation of European officials to the findings of TI BiH in public appearances and during visits to BiH.

### **Cluster 1 Fundamentals and reform priorities**

TI BiH and partners from the European Integration Monitoring Initiative have decided that the focus of advocacy will be Cluster 1 - Fundamentals, which includes the

judiciary and fundamental rights, justice, freedom and security, the functioning of democratic institutions, public administration reform, public procurement, financial control, statistics, etc. These are areas that TI BiH and the members of the coalition have been following for many years and in which they have strong expertise and recognized results.

This choice is strategic, as the negotiations are opened and closed by cluster 1 and it remains active throughout the process, with the possibility of reopening chapters in the event of a backsliding in the rule of law. TI BiH has systematically emphasized that without real progress in this cluster, the European integration process does not have the transformational capacity to strengthen legislation and institutions.

These findings indicated that progress has been slow, fragmented and selective, and that political actors often adapt the interpretation of EU recommendations to their own interests. On several occasions, the European Commission has used TI BiH data in its assessments for BiH and the wider region.

TI BiH actively participated in the consultations on the [2025 Enlargement Package](#) and the report on BiH. Written comments were submitted in April, live consultations and subsequent meetings with representatives of the European Commission were organised during the second half of the year, and key messages were further conveyed in the consultations led by the TI Secretariat in Berlin.

### **Reform Agenda and Growth Plan for the Western Balkans**

In the context of the Growth Plan for the Western Balkans, i.e. the Reform Agenda for BiH, TI BiH has taken a leading role in advocating for the transparency of the process, the involvement of civil society and

the establishment of mechanisms for monitoring the implementation of commitments.

TI BiH pointed out that the drafting and adoption of the Reform Agenda document in BiH was non-transparent, with minimal involvement of the public and civil society, and delays, which contributed to the subsequent reduction of available EU funds for BiH. Through regular meetings with the Directorate for Economic Planning of BiH and other institutions involved, representatives of the EU and Member States, TI BiH has demanded clear structures for implementation and oversight, in which civil society has a formalized role in accordance with EU practice and legal framework. These recommendations are also included in the resolutions of the European Parliament, in the drafting of which TI BiH participated.

One of the key results in this area was the **initiation and organization of an urgent thematic session of the House of Representatives of the Parliamentary Assembly of BiH on BiH's European path** and the adoption of the Reform Agenda. For this session, TI BiH prepared materials and arguments for the urgent involvement of the parliament in the oversight of the process, harmonized the positions of several civil society organizations, communicated with parliamentary clubs and the leadership of the House, and publicly presented the findings on blockades and risks in the implementation of reforms.

This session was an opportunity for a public debate on key challenges in the context of the Reform Agenda, which resulted in the inclusion of institutional actors in the debate that had not been active until then.

I'd like to share this thread with you in the top European forums. In her address to the Parliamentary Assembly of BiH, Commissioner for Enlargement Marta Kos reiterated some of the key messages of TI

BiH, especially regarding the importance of the rule of law, transparency and civil society participation.

In addition to the thematic session, TI BiH also organized **a conference dedicated to the topic of European integration**, which opened a space for all relevant stakeholders to talk about the European Commission's report, civil society assessments on the quality of reforms and the process of drafting and implementing the Reform Agenda. For the first time, some of these topics were systematically presented to a large number of representatives of civil society, BiH institutions, the EU and Member States.

Through this conference, TI BiH connected analytical work with public dialogue and enabled the issue of the Growth Plan and the Reform Agenda to be included among the central political topics in BiH.

Throughout the year, the media often carried statements from TI BiH on the Reform Agenda, the Growth Plan and European integration. Representatives of TI BiH were among the few voices from civil society who consistently emphasized the principles of transparency, inclusiveness and accountability in the public space as the basis for leading these processes.

### **Chairmanship of the Initiative for the Monitoring of European Integration of BiH**

By taking over the chairmanship of the Coordination Board of the Initiative for Monitoring European Integration of BiH, TI BiH led [the coordination of the largest civil society coalition that monitors and publicly evaluates the EU integration process](#) in 2025.

YOU BiH is in this context:

- Coordinate the work of the coalition and harmonize common positions

- prepared joint analyses and summaries of BiH's progress in meeting the conditions
- Communicated with the institutions in BiH, representatives of the EU and the Member States
- He participated in the preparation of joint recommendations to the EU institutions, emphasizing the areas of his activities.

A special focus was placed on strengthening the visibility of civil society in the integration process and on a clearer positioning of TI BiH and the Initiative as relevant actors in the topics of meeting the remaining conditions for the start of negotiations, as well as in the processes related to the Growth Plan and the Reform Agenda.

In 2025, the process of developing a strategic framework for communication began, which will continue in 2026. With this, the Initiative will receive the first communication strategy, and TI BiH and the members of the coalition

will receive clear guidelines for coordinated and understandable communication of the European integration process to the public, decision-makers and partners from the international community.

Through strengthening the structure of the coalition and the role of TI BiH as the presiding organization, quarterly work plans have been established that link advocacy and monitoring activities at the state, entity and local levels. In this way, it is ensured that the findings and recommendations of TI BiH and partner organizations are systematically translated into joint initiatives, public positions and communication with institutions. I'd like to see you and your friends in 2025. On behalf of the coalition, the Coalition launched an initiative for BiH to obtain observer status in the EU Agency for Fundamental Rights, which enables the inclusion in EU institutions of mechanisms that directly benefit civil society, institutions and citizens, before full membership.

## 10. EMPOWERING YOUNG LEADERS

### School of Integrity

TI BiH will continue to educate and network young leaders through TI BiH School of Integrity. In 2025, the ninth generation of the School of Integrity **was implemented**, and so far a total of over 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.

### Policy Lab for Good Governance

Over the past year, TI BiH continued with the implementation of the Policy Lab for Good Governance initiative, and based on the received research project applications, it selected and selected two research teams and one individual researcher to develop policy proposals within the Policy Lab.

The selected research proposals address the topics of transparency and integrity of employment in civil service bodies in BiH, the aim of which is to determine the degree of transparency, integrity and fairness of the process of admission to civil service bodies in BiH, which will serve as a basis for creating concrete recommendations for improving the transparency and functionality of this system and compliance with the *acquis communautaire*.

The second research project deals with the Sustainable Development Goals, and the purpose of the research is to identify the Sustainable Development Goals by their complexity for implementation, to identify key obstacles that hinder the implementation of sustainable policies, but also to analyze possible opportunities for more efficient implementation of policies. Policy will propose concrete recommendations for the implementation of sustainable policies, while improving transparency and efficiency in decision-making.

The third research project deals with the topic of the practice of employing foreign workers in BiH. It includes the analysis of the legal and institutional framework governing the employment of foreign workers in BiH, the assessment of its effectiveness and the identification of best practices. The aim of the research is to offer a comprehensive analysis of systemic inefficiencies in the labor market in BiH and to propose feasible solutions for improving the process of employment of foreign workers in BiH.

The Policy Lab for Good Governance is an initiative designed to encourage innovative, inclusive and evidence-based research focused on addressing governance challenges in Bosnia and Herzegovina. The lab offers a platform where young researchers and policy practitioners collaborate to develop practical solutions to governance issues, emphasizing transparency, accountability, anti-corruption and public sector reform. Given that all works are expected to be finalized by the end of the year, their promotion is planned during 2026, and continued support in advocating for the implementation of the proposed public policies is planned.

## 11. VISIBILITY

During the reporting period, TI BiH significantly expanded its reach and visibility, confirming the key role of online communication in mobilizing the public and strengthening the fight against corruption. Web platforms [ti-bih.org](http://ti-bih.org) ([147.799](#)) and [transparentno.ba](http://transparentno.ba) ([62.387](#)) achieved more than [200](#) thousand views, while digital databases and tools — in particular "Access to Information" and "Database of Public Institutions" — recorded an extremely high level of use, thus confirming themselves as the most relevant publicly available resources for monitoring the work of institutions and accessing information.

The database of public institutions, as the only comprehensive register of its kind in BiH, attracted over [281.248](#) visitors, which testifies to its importance in the context of the lack of an official state register of institutions and the growing need of citizens and researchers for reliable information on the work of public institutions, their spending, the composition of governing bodies, and the like.

TI BiH also achieved extremely strong results on social networks - over 8.5 million views of content on Facebook and slightly more than a million views on Instagram, while YouTube videos achieved more than [1,070,543](#) views or 18,445 hours of viewing over the past year. A special response was achieved by the documentary film "(UN)friend of the Republic", the different versions of which were viewed more than [143 times in total.000](#) times.

Campaigns dedicated to access to information, election integrity and oversight of public spending were among the most viewed content of the year, confirming that digital channels are becoming a key tool in public communication, educating citizens and building social support for anti-corruption reforms.

## Media

I've seen a total of [6 in the reporting period.086](#) **media releases**. The largest number of transmissions was achieved by Internet portals ([5.547 publications](#)), while television recorded [342](#) and print media [196 publications](#).

The announcements were distributed through a wide range of media in BiH, and the most significant number of broadcasts came from leading online platforms and public broadcasters.

Medium	Number of posts
<i>Slobodna-bosna.ba</i>	152
<i>Etto.ba</i>	97
<i>Crna-hronika.info</i>	93
<i>Inforadar.ba</i>	93
<i>Radio Television of Bosnia and Herzegovina</i>	93
<i>N1info.ba</i>	89
<i>Jajce-online.com</i>	88
<i>Bljesak.info</i>	87
<i>Federalna.ba</i>	83
<i>Rtvbn.com</i>	81
<i>Fokus.ba</i>	81
<i>Bosnainfo.ba</i>	79
<i>Bhrt.ba</i>	78
<i>Radiosarajevo.ba</i>	77
<i>Gyka.com</i>	75
<i>Detektor.ba</i>	74
<i>Oslobodjenje.ba</i>	71
<i>Euronews.ba</i>	71
<i>Impulsportal.net</i>	70
<i>Daily newspaper</i>	68
<i>Fena.ba</i>	67
<i>Dnevni.ba</i>	67
<i>Hercegovina.info</i>	61
<i>072info.com</i>	58
<i>Faktor.ba</i>	57
<i>Scena.ba</i>	57
<i>Interview.ba</i>	56
<i>Srpskainfo.com</i>	56

## Websites

I've made **24 announcements** in the reporting period, which totaled **92.869 views** and attracted **34.926 visitors** to the website *tibih.org*. The publications dealt with key topics in the areas of the rule of law, political integrity, freedom of expression,

employment in the public sector, financing of political parties, the fight against corruption and the European integration process.

With its timely reactions and reviews of social problems, TI BiH has positioned itself as a social actor whose publications have the capacity not only to contribute to informing

the public about important issues, but also to shape the public narrative, which greatly helps to advocate for systemic reforms.

	<i>Announcements</i>	<i>Reviews</i>	<i>Visitors</i>
<b>ti-bih.org</b>	28 Announcements	147.799	66.535

1. [TI BiH: Introduction of censorship "through the back door" through amendments to the Criminal Code of FBiH](#)
2. [Presentation of the tool "Access to Information": A step towards greater transparency in BiH](#)
3. [Worst result so far: BiH among the three worst ranked countries in Europe in terms of the state of corruption](#)
4. [The laws passed by the NSA are a retaliatory attack on all critical voices](#)
5. [Professional supervision, written testing and recording of interviews – suggestions for fair and equitable employment](#)
6. [The government introduced a brutal dictatorship in Republika Srpska. The burning of Nebojša Vukanović's car is a consequence of creating an atmosphere of lynching](#)
7. [Who's going to pay for the election campaign? Parties concealed 2.6 million KM in reports, amendments to the Election Law did not prevent the misuse of resources](#)
8. [Number of corruption indictments lowest in four years: Ensure independence and prevent further pressure on the judiciary](#)
9. [Increased number of corruption reports – Citizens are increasingly seeking legal aid](#)
10. [The judiciary is increasingly closed to the public: Courts and prosecutors' offices selectively share information, ignoring citizens and the media](#)
11. [TI BiH: The proposed Law on Financing Political Organizations of Republika Srpska Undermines the Institutional Order and Legalizes Racketeering and Corruption](#)
12. [TI BiH on the new Law on Freedom of Access to Information of Brčko District: It is inadmissible to deny citizens the right to appeal](#)
13. [TI BiH appeals to the Brčko District Assembly: Enable public debate on the new Law on Freedom of Access to Information](#)

14. [World Whistleblower Day in BiH: Fewer and fewer reports, citizens without protection and trust in institutions](#)
15. [Paraintelligence services as a sign of open dictatorship: The government introduces parallel institutions to preserve the regime](#)
16. [Conflict of interest in the election of the Director of the HJPC Secretariat: The Secretary of the Ministry of Justice evaluated the Head of the Minister's Cabinet](#)
17. [I'm going to lose hundreds of millions of dollars because of the personal interests of individuals.](#)
18. [Initiative for Monitoring European Integration: BiH risks losing an additional 108 million euros if it does not adopt the Reform Agenda](#)
19. [International Day for Freedom of Access to Information: Citizens' Right to Information Must Be Fully Guaranteed](#)
20. [In a year, the State Commission has not imposed a single penalty for conflict of interest: Numerous obstructions in the application of the law](#)
21. [Responsible government has nothing to hide: Open all stages of decision-making by governments and parliaments](#)
22. [Enlargement is back on the EU's agenda: BiH can only move forward with substantial reforms](#)
23. [Farce and circumvention of procedures: Draft Law on HJPC sent to the Council of Ministers, although consultations are still ongoing](#)
24. [The Ministry of Justice of Bosnia and Herzegovina, despite the court ruling, still refuses to submit a draft law on the Court of BiH](#)
- [Politics and private business: Nearly 20% of companies owned by elected officials do business with the state](#)
- [How Captured Is the State of BiH: TI BiH Presented the "Index of State Captivity", Parties Created a Parallel Universe](#)
25. [Double anniversary: 30 years since Dayton and 25 years of Transparency International in BiH](#)
26. [Transparency International joins the initiative "Monitoring Reforms and Growth in the Western Balkans"](#)

The **Transparentno.ba** portal published **30 articles** in the reporting period, which achieved **62,387 views** and attracted **33,197 visitors**. The published content focused on the misuse of public resources, conflict of

interest, non-transparent concession award processes, supervision of public procurement, criminal charges, the state of political integrity and electoral irregularities.

	<i>Announcements</i>	<i>Reviews</i>	<i>Visitors</i>
<b>Transparentno.ba</b>	30 articles	62,387	33,197

1. [How the RS government tightened its grip on critics - Documentary film \(Un\)Friend of the Republic available online](#)
2. [I'd like to ask you to control the distribution of money for the promotion of tourism in Banja Luka. The Commission has made a number of mistakes](#)
3. [How is the process of electing the head of the Federal Bureau of Investigation compromised?](#)
4. [I'd like to share \\$383 million with \\$12 million.200 companies, more than 1.800 connected to customers.](#)
5. [Parties cut, citizens pay - 88% of directors of forestry companies linked to politics](#)
6. [TI BiH sues the Government of Canton 10: Information about the process of annulment of the disputed concession at the source of Mandeka in Livno is hidden](#)
7. [Three years since the complaint against Milorad Dodik: Sanctioning of conflict of interest blocked](#)
8. [Only one judicial office holder dismissed for omissions in the last year, the others reduced salaries and reprimands](#)
9. [SNSD punished for "Krajina Evenings", still unknown who pays for the campaign?](#)
10. [TI BiH received two verdicts for hiding information about the disputed concession in Livno: the Cantonal Government ignores the Court's requests](#)
11. [New tenders for Arnel Isak's family company - TI BiH requested a statement from the Ethics Committee of the F BiH Parliament due to an evident conflict of interest](#)
12. [Green transition in the grey zone: Abuses as the background of the largest wind farm in BiH](#)
13. [TI BiH received the documentation on the transfer of the concession for the solar power plant in Trebinje: Director's statement is sufficient proof of technical equipment](#)

14. [Based on the complaint of TI BiH: Disciplinary proceedings initiated against the Chief Prosecutor in Trebinje for omissions in the case of "RITE Gacko"](#)
15. [Conflict of interest in the RAC Council still unanswered by institutions: Appointed member employed in HT Eronet](#)
16. [Hungarian Telex on Transparency International's study in BiH: Numerous irregularities regarding the construction of a solar power plant in Trebinje](#)
17. [I'd like to report seven parties for receiving prohibited donations from companies that do business with the state.](#)
18. [Reform Agenda: What stands in the way of BiH's accession to additional EU funds?](#)
19. [Hungarian businessman left the Trebinje 1 project - the concession was taken over by a company without income and workers](#)
20. [Verdicts for election theft in Dobož: It has been proven that the dead and those who did not go to the polls voted en masse, the accused acquitted](#)
21. [The Ethics Committee of the FBiH Parliament will not punish Arnel Isak for violating the Code of Ethics: His family company continues to win tenders](#)
22. [TI BiH filed a criminal complaint against those responsible in the public procurement procedure for the construction of the house "Predah" in Banja Luka](#)
23. [TI BiH sued the Ministry of Economy in Canton 10 for hiding data on concession revenues](#)
24. [In a year, the State Commission has not imposed a single penalty for conflict of interest: Numerous obstructions in the application of the law](#)
25. [After the report of TI BiH, Hurtić was punished for conflict of interest. Another report was filed for trying to circumvent legal restrictions](#)
26. [TI BiH asks for supervision of the million-dollar tender in Banja Luka: Suspicious references and procurement model reported to the Public Procurement Agency of BiH](#)
27. [After three years, the State Commission dismissed the complaint against Dodik due to conflict of interest](#)
28. [Estimation of TI BiH: SNSD's campaign is four times more expensive than SDS's. Karan in 11 days 57 times shown on RTRS, Blanuša 2 times](#)

- [29. MP, entrepreneur and civil servant: Would you file charges due to the conflict of interest of Nikolina Šljivić?](#)
- [30. TI BiH calls on the CEC to investigate suspicions of electoral fraud in Republika Srpska: Suspicious voting patterns at numerous polling stations could have influenced the outcome of the elections](#)
- [31. China-Singapore investments of 1.5 billion BAM: How the Trebinje 1 wind farm project became Leotar](#)
- [32. Collection of concession fees in BiH reduced by 17%, many concessionaires avoid paying already small obligations](#)

These contents have further strengthened the portal's role as a key source of investigative journalism and resources for civil society organizations involved in overseeing the consumption and management of public resources, contributing to greater public awareness and documentation of systemic abuses.

In the reporting period, TI BiH continuously improved and promoted its databases and digital tools that enable citizens, journalists and researchers easier access to information and monitoring the work of institutions. The overall attendance of these tools shows a steady growth in public interest.

## Bases & Tools

	<i>Reviews</i>	<i>Visitors</i>
AC Monitor	409	267
Judiciary Index	4,191	776
Map of Corruption Prosecution	1,028	217
Report Corruption	4,208	2,385
Access to information	82,469	52,605
Database of Public Enterprises	12,840	5,096
Register of Public Office Holders	14,209	5,695
Register of Concessions in BiH	113,616	102,106
Database of Public Institutions	281,248	266,083
Monitoring the distribution of public funds to associations and foundations in BiH	7,367	2,472

These results confirm the importance of TI BiH's digital tools as key resources for

transparency, public oversight and informed citizen participation.

## Social networks

- **TikTok** 10,962 video views
- **YouTube** 16 new video posts, 1,070,543 views, 4,536 subscribers,  
[Featured content: \(NOT\) friend of the Republic - Documentary film](#) 33,985 views  
[\(NOT\)friend of the Republic - Documentary film BN TV](#) 82,582 views  
[\(UN\)friend of the Republic - Documentary film Al Jazeera Balkans](#) 26,896 views
- **Twitter** 77,229 impressions, 2,739 followers
- **Facebook** 8,511,508 views (video, graphics, text, link to post), 32,091 interactions (like, share, comment), 30,466 followers

[suspicions of election irregularities](#)  
122,922 views, 90 likes, 68 shares

### Featured content:

[\(UN\)friend of the Republic - Documentary film](#) 891,982 views, 1,048 interactions, 129 days and 22 hours of total viewing  
[Promotion pristupinformacijama.ba](#) 936,127 views, 878 interactions, 101 days and 3 hours of total  
[Hungarian businessman Roland Lugos has left the project to build the Solar Power Plant Trebinje](#) 1,141,146 views, 198 likes, 118 comments and 29 shares

- **Instagram** 1,340,047 post views, 7540 interactions (like, share, comment), 3,491 followers  
**Featured content:**  
Promotion [pristupinformacijama.ba](#) 497,885 views, 239 likes, 6 comments, 14 shares  
[I'm looking for a million-dollar tender in Banja Luka!](#) 122,969 views, 57 likes  
Graphics for the text [TI BiH calls on the CEC to urgently investigate](#)

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