



REPUBLIKA E SHQIPËRIË  
MINISTËR SHTETI PËR ADMINISTRATËN  
PUBLIKE DHE ANTIKORRUPSIONIN

NATIONAL COORDINATOR AGAINST CORRUPTION

# **MONITORING REPORT FOR THE PERIOD JANUARY- DECEMBER 2025**

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## **INTERSECTORAL STRATEGY AGAINST CORRUPTION 2024 - 2030**

*Tirana, on 16.04.2026*

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## LIST OF ABBREVIATIONS

|                    |   |
|--------------------|---|
| AASCA              | <b>Agency of the Administration of Seized and Confiscated Assets</b>                |
| ADG                | Agency for Dialogue and Co-Governance   |
| FIA                | Financial Intelligence Agency   |
| PSA                | Police Supervision Agency   |
| CA                 | <b>Contracting Authorities</b>  |
| NAIS               | National Agency of Information Society  |
| ASCS               | Agency for the Support of Civil Society   |
| NFA                | National Food Authority   |
| NVPPA              | National Veterinary and Plant Protection Authority                                  |
| ASLG               | Agency for the Support of Local Self-Government                                     |
| PPA                | Public Procurement Agency   |
| PA                 | Public Authorities  |
| ASPA               | Albanian School of Public Administration  |
| SCA                | State Cadaster Agency   |
| ATP                | Agency for Treatment of Property  |
| CTA                | Concessions Treatment Agency  |
| SA                 | Security Academy  |
| ARDA               | Agricultural and Rural Development Agency   |
| ALTRI              | Albanian Institute for Legal and Territorial Research                               |
| EU                 | European Union  |
| EACIDS             | Electronic Asset Declaration and Conflict of Private Interests System               |
| NBI                | National Bureau of Investigation  |
| DPoA               | Department of Public Administration   |
| GD <sup>o</sup> A  | General Directorate of Anti-Corruption  |
| GD <sup>o</sup> P  | General Directorate of Prisons  |
| GDC                | General Directorate of Customs  |
| GD <sup>o</sup> SP | General Directorate of State's Police   |
| GDT                | General Directorate of Taxation   |
| DFAS               | Directorate of Fisheries and Aquaculture Services                                   |
| NHA                | National Housing Authority  |
| ERA                | Energy Regulatory Authority   |
| ERRR               | Electronic Register of Requests and Responses                                       |
| ECHR               | European Court of Human Rights  |
| SCCOC              | Specialized Court for Corruption and Organized Crime                                |
| HIJ                | High Inspector of Justice   |
| HIDAACI            | High Inspectorate for the Declaration and Audit of Assets and Conflict of Interests |
| INSTAT             | Institute of Statistics   |
| IPSI               | Integrated Planning System Information System                                       |
| ICC                | International Chamber of Commerce   |
| AAN                | Inter-Institutional Center Albanian Academic Network                                |
| CI                 | Central Inspectorate  |
| CPL                | Corruption Proofing of Legislation  |
| FSVMI              | Food Safety and Veterinary Medicine Institute                                       |
| CRIPCI             | Commissioner for the Rights to Information and Protection of Personal Data          |
| NCAC               | National Coordinator Against Corruption   |
| HJC                | High Judicial Council   |
| HPC                | High Prosecutorial Council  |
| HSA                | High State Audit  |
| CM                 | Council of Ministers  |
| CCSS               | Commissioner for the Civil Service Supervision                                      |
| PPC                | Public Procurement Commission   |
| CEC                | Central Elections Commission  |
| AsA                | Assembly of Albania   |
| MSPAA              | Minister of State for Public Administration and Anti-Corruption                     |
| MES                | Ministry of Education and Sports  |
| MoI                | Ministry of Interior  |
| MoARD              | Ministry of Agriculture and Rural Development                                       |
| MoJ                | Ministry of Justice   |
| MECI               | Ministry of Economy, Culture and Innovation   |
| MEFA               | Ministry for Europe and Foreign Affairs   |
| MoF                | Ministry of Finance   |
| MSRP               | Minister of State for Relations with the Parliament                                 |
| MHSP               | Ministry of Health and Social Protection  |
| MSLC               | Minister of State for Local Government  |
| MSEBC              | Minister of State for Entrepreneurship and Business Climate                         |
| NPIE               | National Plan for European Integration  |
| NCTA               | National Center of Traditional Activities   |
| CSO                | Civil Society Organizations   |
| OSCE               | Organization for Security and Co-operation in Europe                                |
| OECD               | Organisation for Economic Co-operation and Development                              |
| GPO                | General Prosecutor's Office   |
| SP                 | State Police  |
| MTBP               | Medium-Term Budget Programme  |
| ATTC               | Agricultural Technology Transfer Centers  |
| ART                | Albanian Radio Television   |
| NSDI               | National Strategy for Development and Integration                                   |
| SASPAC             | State Agency for Strategic Programming and Aid Coordination                         |
| ISAC               | Inter-Sectorial Strategy against Corruption   |
| SPAK               | Special Structure against Corruption and Organized Crime                            |
| SoM                | School of Magistrates   |
| UAT                | University of Arts, Tirana  |
| PUT                | Polytechnic University of Tirana  |
| UT                 | University of Tirana  |
| UN                 | United Nations  |
| UNICEF             | United Nations Children's Fund  |
| UNODC              | United Nations Office on Drugs and Crime  |
| RAI                | Regional Anti-Corruption Initiative   |
| RMG                | Risk Management Group   |
| CPT                | Continuous Professional Training  |

|              |   |
|--------------|---|
| <b>IJS</b>   | Intersectoral Justice Strategy                        |
| <b>NITP</b>  | National Inspectorate for Territorial Protection      |
| <b>FPRP</b>  | Fire Protection and Rescue Police                     |
| <b>COD</b>   | Center for Openness and Dialogue                      |
| <b>IDM</b>   | Institute for Democracy and Mediation                 |
| <b>JPO</b>   | Judicial Police Officer                               |
| <b>ARO</b>   | Asset Recovery Office                                 |
| <b>LPD</b>   | Local Police Directorate                              |
| <b>WBCJ</b>  | Western Balkans Criminal Justice Project              |
| <b>QAAPE</b> | Quality Assurance Agency for Pre-University Education |
| <b>EJNC</b>  | European Judicial Network for Cybercrime              |

## Executive Summary

Inter-Sectorial Strategy against Corruption 2024–2030 constitutes the main policy framework for anti-corruption policies and measures in Albania. The Strategy establishes an integrated approach based on prevention, enforcement, and awareness, in line with European standards and the country’s commitments in the integration process.

The annual monitoring report for 2025 presents the progress achieved in the implementation of the Strategy and its Action Plan, highlighting key developments, challenges encountered, and priorities for the future.

The report is based on data reported by the implementing institutions, processed and consolidated through a structured monitoring process coordinated by the General Directorate of Anti-Corruption, acting as the technical secretariat under the National Anti-Corruption Coordinator.

During 2025, the focus continued to be on the **prevention of corruption**, through the adoption of the “Anti-Corruption” legislative package, as well as the adoption and establishment of assessment rules through the Corruption Risk Assessment Methodology in the public sector and the Methodology for Assessing Corruption Vulnerabilities in Parliamentary services. Particular attention was given to strengthening integrity instruments, transparency mechanisms, and accountability in the public administration, at both central and local levels.

In terms of **enforcement**, efforts were intensified to increase the effectiveness of corruption investigation and prosecution, through strengthened inter-institutional cooperation, increased technical and analytical capacities of law enforcement structures, and improved quality of referrals and investigations. A proactive approach in investigations has been observed, along with broader use of analytical tools and access to state databases.

In the area of **awareness**, public communication and integrity education have been expanded, through the integration of anti-corruption topics into the educational curriculum, the development of activities with pupils and students, and continuous institutional communication (e-bulletins, social media, public events). The involvement of youth, civil society, and other stakeholders has contributed to raising awareness and promoting a culture of integrity and ethical behavior.

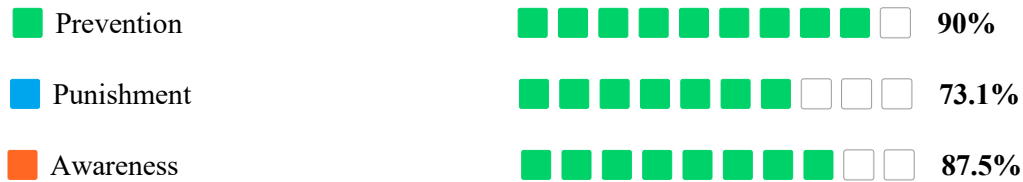
### What does the Report contain?

The 2025 Annual Monitoring Report analyzes the progress of 16 specific objectives, the implementation of 47 measures and 138 activities, as well as performance measurement through 24 performance indicators.

The Anti-Corruption Action Plan has achieved an implementation level of 83.5%, and, broken down by policy goals, is as follows:

**Strategic Policies**

**Achievement**



**Overall level of implementation**

The monitoring process indicates that:

- 24 measures and 91 activities have been implemented;
- 16 measures and 20 activities have been partially implemented (still under implementation);
- 7 measures and 27 activities have not been implemented.

**Key achievements in 2025:**

**1. Prevention of corruption:**

- Progress was made in the drafting and adoption of the legal acts within the “Anti-Corruption” legislative package, establishing the foundations for a more comprehensive framework aligned with EU standards, regulating activities such as lobbying, donations and sponsorships, and conflicts of interest in the exercise of public functions.
- The Corruption Risk Assessment Methodology was adopted, and its extension into sectoral methodological acts was initiated, including its application in priority sectors such as public procurement.
- The Methodology for Assessing Corruption Vulnerabilities in the services of the Parliament was adopted, and its implementation covered 8 legal acts in cooperation with civil society experts. Assessments of corruption vulnerabilities were carried out for approximately 1,050 draft acts (draft laws and Council of Ministers decisions).
- The network of Anti-Corruption Contact Points at central and local levels was consolidated, along with institutional prevention mechanisms (anti-corruption coordinators, integrity coordinators, and access-to-information coordinators).
- The e-Albania platform reached 3.43 million active users, citizens and businesses, providing 1,266 electronic services.

**2. Punishment of corruption:**

- The role of the General Directorate of Anti-Corruption was strengthened, with a focus on administrative verification and investigation, through the enhancement of technical capacities and the adoption of regulatory acts. A total of 439 verification and administrative investigation cases were handled, 71 final reports were completed, for which 207 administrative measures and 234 recommendations were proposed, as well as 2 criminal referrals submitted.
- The Special Prosecution Office increased access to state databases, reaching a total of 22 databases, thereby improving the efficiency and quality of investigations, particularly in complex financial and asset-related cases. Analytical and investigative tools were further expanded, contributing to a 31% increase in expert examination acts in the NBI laboratories, the establishment of a preventive interception unit within the NBI, and the advancement of new structures for risk assessment and international cooperation.

- The Special Prosecution Office registered 294 new criminal proceedings, of which 109 were initiated ex officio, reflecting an increase in the proactive approach to investigating corruption. The remaining criminal proceedings related to corruption originated from referrals by the judicial police, institutions, and other entities, with a significant increase in referrals from the State Police (approximately 70%) and public authorities (approximately 15%).
- The Police Supervision Agency intensified its investigative activity in cooperation with the prosecution offices, referring 336 criminal cases involving 444 subjects and implementing 133 security measures, including detentions and arrests in flagrante delicto, mainly against personnel of police structures.
- International operational cooperation in the fight against corruption and organized crime was strengthened, through the implementation of 11 joint operations with international partners, of which 5 were conducted by the State Police in cooperation with Interpol and Europol, and 6 by the Special Prosecution Office with foreign authorities.
- Information exchange was intensified, with 36,632 international communications through Interpol and Europol channels and liaison officers, as well as the establishment of 6 Joint Investigation Teams and 16 coordination meetings.

### ***3. Awareness and anti-corruption education:***

- Public communication and awareness in the fight against corruption were strengthened through the development of information and citizen engagement tools, as well as the establishment and operationalization of the official website of the General Directorate of Anti-Corruption.
- The 7th edition of the “Integrity Week” has been organized as a comprehensive platform for awareness-raising and inter-institutional dialogue, with the participation of public institutions, the private sector, and international partners.
- Active youth engagement has been promoted through educational activities, debates, forums, and awareness initiatives, including the organization of activities at universities in Durrës, Shkodër, and Tirana.
- The integration of the gender perspective into anti-corruption policies and activities has been strengthened through the inclusion of the gender component in 4 specific projects supported by the ASCS on anti-corruption issues with a gender focus, as well as through awareness-raising activities and forums with the participation of women and girls, aiming to enhance their role in identifying and addressing corruption.

### ***Challenges and conclusions:***

During 2025, the progress achieved has demonstrated a steady consolidation of the strategy’s implementation mechanisms; however, it has also highlighted several challenges that require continuous attention. These include the need to accelerate the adoption of the legal framework, strengthen capacities at the local level, and improve mechanisms for measuring the impact of anti-corruption measures.

## **I. SUMMARY INFORMATION ON THE INTER-SECTORAL STRATEGY AGAINST CORRUPTION 2024–2030 AND THE ACTION PLAN 2024–2026**

## ***1.1 Introduction***

Inter-Sectorial Strategy against Corruption 2024-2030 represents Albania's highest political and institutional commitment in the fight against corruption, as one of the most sensitive challenges for society and the country's democratic development. This strategic document has been drafted in line with the principles of the rule of law, transparency, accountability, and integrity, and aims to create a more integrity-driven and effective environment in the functioning of public administration and in the delivery of services to citizens.

The vision of the Strategy is: *“Public institutions that perform their functions in accordance with the highest standards of integrity, transparency and public accountability and provide efficient services to citizens”*, and it is concretized through three main objectives: **prevention, punishment and awareness**.

**The Inter-Sectorial Strategy against Corruption 2024–2030**, adopted by Council of Ministers Decision No. 859, dated 26.12.2024, represents the continuation and at the same time a sustainable and direct approach of the commitments of the Albanian State in the direction of anti-corruption policies. Based on a careful analysis of the progress achieved, on the assessment of the challenges encountered and on the necessity to further harmonize government policies with the priorities of the European integration process, the new strategy has been consolidated as a comprehensive document, supported by evidence, broad consultations and international standards. It represents a qualitative step towards increasing institutional effectiveness, through a coordinated national approach and measurable mechanisms for monitoring and evaluation.

**The Strategy and the Action Plan 2024–2026** have been drafted in full compliance with international standards in the field of the fight against corruption, reflecting the commitments of Albania as a State Party to the United Nations Convention against Corruption, the GRECO recommendations within the framework of the Council of Europe, as well as with the NPIE & EU *acquis*. Specifically, Chapter 23: Judiciary and Fundamental Rights, a fundamental chapter in the accession negotiation process. The Strategy contains 16 specific objectives, accompanied by an action plan with 53 result-based measures and 24 performance indicators. In particular, it is based on the principles of transparency, integrity, accountability, whistleblower protection, strengthening of anti-corruption mechanisms in the public sector and promotion of education and citizen awareness. These elements constitute the thematic backbone of the strategy and are in full compliance with the best international practices.

The implementation process is also supported by international technical partners, who contribute to strengthening the quality of policy instruments and to monitoring the progress of the country.

**This monitoring report** reflects the progress of the implementation of the measures foreseen for the period *January-December 2025*, providing the assessment for the second year of the implementation of the strategy. It is based on a regular process of collection and analysis of data administered by public implementing institutions at central and local level, as well as by other institutional actors. The assessment has been carried out in accordance with the performance measurement framework and with the methodology approved for monitoring the strategy, focusing on the performance indicators and the target values for the year in question.

The implementation of the strategy has been supported by a consolidated system of coordination and inter-institutional cooperation, centralized within the General Directorate of Anti-Corruption, a technical structure dedicated to monitoring, analysis, and evaluation of the implementation of the strategy.

In the monitoring report for 2025, new and important developments are included for all three policy objectives of the strategy, with reference to preventive initiatives focused on regulatory mechanisms and anti-corruption implementation instruments, institutional structures and technical staff engaged within public authorities, strengthening and capacity building within justice and law enforcement bodies, as well as the consolidation of increased public awareness and civic education through cooperation, active participation, and interaction. Special attention has been given to the development of legislative initiatives for the composition of the “anti-corruption” legislative package, supported in particular by the new legal acts adopted and those in process, integrity structures and mechanisms (integrity plans, whistleblowing units, asset declaration control, transparency and information mechanisms, cooperation with stakeholder groups (CSOs and the private sector), administrative investigation structures and criminal investigation structures, assets seized following the investigation and adjudication of corruption crimes, international joint investigative operations, technical-professional capacities of law enforcement authorities, as well as communication and anti-corruption education.

In this context, the 2025 monitoring report represents a key evaluation instrument, providing a clear overview of the progress and impact of the implemented measures and the expectations for the implementation of the strategy during its second year of implementation.

The monitoring process has been led by the Minister of State for Public Administration and Anti-Corruption, in the role of the National Anti-Corruption Coordinator, and has been implemented in close cooperation with the General Directorate of Anti-Corruption, as the technical structure responsible for the preparation of the monitoring report. Through a functional network of anti-corruption contact points, this time including also at the level of local self-government units (municipalities) and prefectures, the monitoring has covered and provided data for all relevant levels of public administration across all levels of governance.

This report also presents a summary of the progress for each specific objective, for each measure and activity planned for implementation, clearly assessing their fulfillment according to the relevant performance indicators, measured on a six-month basis. In conclusion, the report provides an analysis of achievements, challenges encountered, and the necessary recommendations for further improvement of the implementation of the strategy and the action plan for the following year.

This document is a fundamental instrument for transparency and accountability in the process of implementation of anti-corruption policies and a concrete evidence of the will of Albanian institutions to build a public administration more fair, efficient, and trustworthy for its citizens.

For the period *January–December 2025*, data have been collected and analyzed for 24<sup>1</sup> performance indicators, distributed respectively into 15 indicators for specific objectives under the preventive approach, 5 indicators for specific objectives under the punitive approach, and 4 indicators for specific objectives under the awareness-raising approach.

Below, the achievement of the Strategy’s objectives is presented according to the level of performance indicator achievement<sup>2</sup>:

| Specific objectives |   | Level of achievement according to performance indicators |
|---------------------|---|--|
| Prevention          | 1.1 Strengthening of the legal framework and institutional capacities in the prevention of corruption   | 95%  |
|                     | 1.2 Strengthening of transparency, accountability and integrity of public institutions at all levels of governance  | 100%   |
|                     | 1.3 Development of a sustainable approach to the prevention of corruption in high-risk sectors (high prevalence of corruption)                            | 25%  |
|                     | 1.4 Strengthening of corruption prevention mechanisms in local self-government units  | 100%   |
|                     | 1.5 Protection of public finances and assets from misuse during the exercise of public functions  | Not measured <sup>3</sup> %                              |
|                     | 1.6 Strengthening of the whistleblower framework for the early detection of corruption  | 100%   |
|                     | 1.7 Strengthening of financial transparency and the integrity of political parties  | 100%   |
|                     | 1.8 Establishment of the legislative and institutional framework for lobbying as an anti-corruption prevention instrument                                 | 100%   |
|                     | 1.9 Promotion of integrity in the private sector  | 100%   |
| Punishment          | 2.1 Strengthening of the legislative and institutional framework and professional capacities for the effective administrative investigation of corruption | 100%   |
|                     | 2.2 Strengthening of capacities, resources and performance for effective criminal investigation and prosecution of corruption                             | 54.3%  |
|                     | 2.3 Strengthening of international cooperation of law enforcement agencies and judicial bodies in the fight against corruption                            | 65%  |
| Awareness           | 3.1 Increasing citizens awareness of the negative consequences of corruption and encouraging them to oppose, report and denounce corruption               | 100%   |

<sup>1</sup> For the two indicators (1.5.1 and 1.5.2), it has resulted that they were not possible to measure for this monitoring report.

<sup>2</sup> Based on the measurement of the target values for the performance indicators, according to Annex 2 of the ISAC.

<sup>3</sup> The data for the performance indicator can be obtained, administered, and evaluated in May 2026, and will be included in the 6M1 2026 monitoring report.

|  |  |      |
|--|--|------|
|  | 3.2 Education of youth on ethics, integrity and proactive engagement in the fight against corruption                                       | 50%  |
|  | 3.3 Involvement of public opinion, especially the private sector, civil society organizations and academia in the fight against corruption | 100% |
|  | 3.4 Strengthening the participation of women to identify and combat corruption at different levels and sectors                             | 100% |

For the period January - December 2025, data have been collected and analyzed for 47 measures and 138 activities, distributed respectively as follows: 27 measures and 86 activities for the preventive approach, 10 measures and 31 activities for the punitive approach, and 10 measures and 21 activities for the awareness-raising approach .

In the following, the implementation of the action plan is presented for each objective of the strategy according to the level of implementation of the measures <sup>4</sup>.

| Specific objectives   | Level of implementation according to the measures of the Action Plan |
|---|--|
| 1.1 Strengthening the legal framework and institutional capacities in the prevention of corruption  | 86 ñ 110 percent of measures implemented                             |
| 1.2 Strengthening transparency, accountability and integrity of public institutions at all levels of governance                                 | 51 ñ 85 percent of measures implemented                              |
| 1.3 Development of a sustainable approach for the prevention of corruption in high-risk sectors (high prevalence of corruption)                 | 31 ñ 50 percent of measures implemented                              |
| 1.4 Strengthening mechanisms for preventing corruption in local self-government units   | 51 ñ 85 percent of measures implemented                              |
| 1.5 Protection of public finances and assets from misuse during the exercise of public function   | 0 ñ 30 percent of measures implemented                               |
| 1.6 Strengthening the whistleblower framework for early detection of corruption   | 31 ñ 50 percent of measures implemented                              |
| 1.7 Strengthening financial transparency and integrity of political parties   | 86 ñ 110 percent of measures implemented                             |
| 1.8 Establishment of the legislative and institutional framework for lobbying as an instrument for preventing corruption                        | 86 ñ 110 percent of measures implemented                             |
| 1.9 Promotion of integrity in the private sector  | 31 ñ 50 percent of measures implemented                              |
| 2.1 Strengthening the legislative, institutional framework and professional capacities for effective administrative investigation of corruption | 51 ñ 85 percent of measures implemented                              |
| 2.2 Strengthening capacities, resources and performance for effective criminal investigation and prosecution of corruption                      | 86 ñ 110 percent of measures implemented                             |

<sup>4</sup> Based on the M&V assessment methodology of the implementation of the measures and activities of the Action Plan, as referred to in Annex 1 of this monitoring report .

|  |   |
|--|---|
| 2.3 Strengthening international cooperation of law enforcement agencies and judicial bodies in the fight against corruption, economic crime and money laundering | 86 në 110 percent of measures implemented |
| 3.1 Increasing citizens awareness of the negative consequences of corruption and encouraging them to oppose, denounce and report corruption                      | 86 në 110 percent of measures implemented |
| 3.2 Education of youth on ethics, integrity and proactive engagement in the fight against corruption   | 86 në 110 percent of measures implemented |
| 3.3 Involvement of public opinion, especially the private sector, civil society organizations and academia in the fight against corruption                       | 51 në 85 percent of measures implemented  |
| 3.4 Strengthening the participation of women to identify and combat corruption at different levels and sectors   | 51 në 85 percent of measures implemented  |

As stated above, from the analysis carried out it results that the progress achieved for each of the policy objectives<sup>5</sup>, prevention – punishment – awareness, is presented as follows:

|                        |                   |
|------------------------|-------------------|
| Preventive Policy (I)  | 90 <sup>6</sup> % |
| Punitive Policy (II)   | 73.1 %            |
| Awareness Policy (III) | 87.5 %            |

For the period January - December 2025, good achievements have been recorded in the preventive, punitive and awareness-raising policies of the implementation of the strategy, including:

Prevention:

- During 2025, the Assembly of the Republic of Albania approved acts of the “Anti-Corruption” legal package, including the law “On the Asset Recovery Office”, the law “On whistleblowing and protection of whistleblowers”, as well as other acts foreseen within the framework of the Analytical Plan of Acts. These developments directly contributed to the approximation of the country’s legal framework with the EU *acquis* and to strengthening the instruments of integrity and transparency in the public administration. In parallel, during 2025, the draft law “On Lobbying in the Republic of Albania” was prepared and approved by the Council of Ministers, and in-depth legal analyses and assessments were carried out for other legal initiatives in process, such as the framework for preventing conflict of interest, donations and sponsorships, and the financing of political parties.
- During 2025, the implementation of the Methodology for the Assessment of Corruption Spaces in the services of the Assembly has been consolidated, which was included in the Rules of Procedure of the Assembly. The assessment process has been significantly expanded, being applied to a greater number of legal acts (8 legal acts), while at the level

<sup>5</sup> Based on the M&V assessment methodology of the implementation of the measures and activities of the Action Plan.

<sup>6</sup> Objective 1.5 has not been included in the measurement due to the inability to obtain data on its performance indicators until May 2026.

of the central administration, assessments of corruption spaces have been carried out for approximately 1050 draft acts, reflecting a more systematized approach to “*corruption proofing of legislation*”.

- During 2025, the Anti-Corruption Contact Points Network and integrity mechanisms in public institutions have been consolidated, where in 367 authorities coordinators for the right to information have been appointed, 185 responsible units for whistleblowing operate in the public sector and 526 in the private sector, while 78 institutions have approved and published integrity plans. In function of strengthening capacities, dedicated trainings have been carried out for the coordination and implementation of anti-corruption measures, including trainings delivered by ASPA for the network of anti-corruption contact points.
- During 2025, with regard to increasing transparency and access to information, the use of the Electronic Register of Requests and Responses has been expanded with 25 additional public authorities, bringing the total number to 272.
- During 2025, the implementation of the risk-based approach has continued through the approval and application of the Methodology for Corruption Risk Assessment in the public sector, as well as the development of capacities for its implementation at central and local level. In parallel, concrete processes of integrity risk assessment have been undertaken in key institutions, such as the State Cadastre Agency, and the Integrity Plan 2025–2027 has been approved.
- During 2025, the integration of integrity and civic behavior topics into the pre-university education curriculum has continued, through the revision of the “Citizenship” subject program for grades 1, 6 and 10, contributing to the long-term building of a culture of integrity in society. The curriculum is expected to start implementation (teaching in schools) in the academic year 2026–2027.
- During 2025, the Supreme State Audit has continued an active role in identifying and addressing corruption risks through its audit activity, carrying out a total of 55 audit missions in various institutional fields. From these audits, 1034 recommendations have been issued, of which 919 have been accepted, reflecting a high level of institutional response and follow-up of audit findings.

*Punishment:*

- During 2025, GDoA has handled 439 cases of verification and administrative investigation, finalizing 71 final reports, in which 207 administrative measures and 234 recommendations have been proposed, as well as submitting 2 criminal complaints. These results reflect the strengthening of investigative capacities and a consolidated approach in addressing administrative and criminal violations in the public sector. GDoA has a new regulation on its organization and functioning.
- During 2025, institutional capacities for the investigation of corruption and financial crime have been significantly strengthened, through the consolidation of specialized structures in

the prosecution offices of general jurisdiction and the increase of professional expertise in the Special Prosecution Office.

- During 2025, analytical and investigative tools have been expanded, including a 31% increase in expert examination acts in the NBI laboratories and the expansion of SPAK's access to 22 state databases, improving the efficiency and quality of investigations, especially for complex financial and asset-related cases. In parallel, measures have been undertaken for further institutional development, including the establishment of the preventive interception section in NBI and the advancement of new structures for risk assessment and international cooperation.
- During 2025, the Special Prosecution Office has registered 294 new criminal proceedings, of which 109 initiated ex officio, reflecting an increase in the proactive approach to the investigation of corruption. The remaining criminal proceedings for corruption have originated from referrals by the judicial police, institutions and other entities, with a significant increase in referrals from the State Police (around 70%) and public authorities (around 15%), indicating strengthened inter-institutional cooperation and reporting mechanisms.
- During 2025, the Police Supervision Agency has intensified investigative activity in cooperation with the prosecution offices, referring 336 criminal cases for 444 subjects and applying 133 security measures, including detentions and arrests in flagrante, mainly against employees of police structures. The analysis of cases shows that abuse of office and passive corruption remain the most widespread forms of illegality (around 30%), while the activity of the PSA reflects an active and proactive approach in pursuing and addressing legal violations within the police ranks.
- During 2025, international operational cooperation in the fight against corruption and organized crime has been strengthened, through the implementation of 11 joint operations with international partners, of which 5 by the State Police in cooperation with Interpol and Europol and 6 by the Special Prosecution Office with foreign authorities. In parallel, the exchange of information has been intensified, with a total of 36,632 international communications through Interpol, Europol channels and liaison officers, and 6 Joint Investigation Teams have been established, accompanied by 16 coordination meetings. These developments have directly contributed to increasing the effectiveness of cross-border investigations and addressing advanced forms of criminality.
- During 2025, mechanisms of international cooperation have been further consolidated through the signing of 25 international acts by the State Police, as well as a number of cooperation memoranda by the General Prosecution Office and the Special Prosecution Office with regional and international partners. At the same time, cooperation has also been expanded in terms of international legal assistance, where 86 incoming requests have been handled and 151 requests have been sent to foreign authorities, as well as 43 extradition requests have been transmitted.

### Awareness:

- During 2025, public communication and awareness in the fight against corruption have been significantly strengthened, through the development and diversification of information tools and interaction with citizens. The official website of the General Directorate of Anti-Corruption has been established and made functional, providing detailed information on institutional activity, strategic documents, as well as mechanisms for reporting corruption cases. In parallel, the Communication and Visibility Plan 2025 has been drafted and implemented, which includes 8 awareness-raising activities distributed throughout the year, focusing on increasing public information and civic education on the consequences of corruption and ways to report it.
- During 2025, the 7th edition of the “Integrity Week” has been organized, a comprehensive platform for awareness and inter-institutional dialogue, which included educational activities, debates with youth, exhibitions and conferences with the participation of public institutions, the private sector and international partners. The activities focused on promoting a culture of integrity, transparency and accountability, as well as on the active involvement of youth through initiatives such as “Youth Voice for Integrity” and artistic activities.
- During 2025, with regard to the involvement of youth in higher education, awareness-raising activities have been carried out in cooperation with civil society organizations and universities, including three open sessions in universities in Durrës, Shkodër and Tirana, as well as forums and lectures with students of legal and political sciences.

## **1.2 Monitoring Methodology**

The monitoring report for the implementation of the Inter-Sectorial Strategy against Corruption 2024–2030 and the Action Plan, for the year 2025, has been prepared by the General Directorate of Anti-Corruption, in the capacity of the responsible authority for the follow-up and inter-institutional coordination of policies in this field. Pursuant to the decision of the Council of Ministers No. 436, dated 26.6.2024, and the Order of the Prime Minister No. 146, dated 1.8.2024, the Sector for Monitoring and Coordination of Priority Policies has been structured, which has followed the entire technical and institutional cycle of drafting the report *for the period 1 January – 31 December 2025*.

The process has been carried out in accordance with the reporting manual in the IPSIS system, ensuring coherence with the logical structure of the strategy, including assessment of policy objectives, specific objectives, concrete measures and performance indicators for each responsible institution. The report is built on the basis of a clear methodology for the collection, analysis and classification of data according to three main pillars: (1) implementation of the measures of the action plan, (2) achievement of target values for performance indicators, and (3) compliance with the principles of good governance and effectiveness of resources

In accordance with the new integrated intersectoral approach, monitoring has been linked with the Integrated Policy Mechanism, through the functioning of the Anti-Corruption Thematic Team and regular dialogue with public actors, development partners and civil society.

The analysis has also been extended to financial components, identifying the link between budgetary programs and the implementation of the measures of the strategy, and has included risk assessments in line with financial management and control standards. The report is built on analytical bases and comparable data through graphs, tables, SMART indicators and performance categorizations on a five-level scale (poor, sufficient, good, very good, exceeded).

This document will serve not only to measure annual progress, but also to guide decision-making, budget planning and the further improvement of anti-corruption policies, in function of increasing integrity, transparency and accountability in public administration and in service of citizens. The detailed monitoring methodology followed can be found in Annex 1 of this monitoring report.

### ***1.3 Public consultation of the monitoring report***

In accordance with the criteria for public consultation, within the framework of drafting the report, the General Directorate of Anti-Corruption consulted the preliminary data for the preparation of the first draft of the report during the period 29 January–4 February 2026. The first draft of the monitoring report was shared for opinion and input with the implementing institutions of the Inter-Sectorial Strategy against Corruption 2024–2030 through the anti-corruption contact points, on 11–27 February 2026. Subsequently, upon receiving additional information on the measures and activities of the action plan and the annual target values for the performance indicators, the statistical information was completed and the progress achieved was reassessed.

The second draft of the report was submitted for evaluation and consultation to the implementing institutions of the Inter-Sectorial Strategy against Corruption 2024–2030 on 24 March 2026, as well as to SASPAC, which serves as the responsible unit for the central coordination of the Integrated Policy Management Groups.

On 26 March 2026, a meeting of the Anti-Corruption Technical Thematic Team was held, with the participation of the anti-corruption contact points of the institutions implementing the Inter-Sectorial Strategy against Corruption 2024–2030, during which the report was presented, discussed and its content agreed upon.

On 1 April 2026, this report was officially submitted to the Minister of State for Public Administration and Anti-Corruption in the role of National Anti-Corruption Coordinator, who also leads the Anti-Corruption Thematic Team.

Subsequently, the Anti-Corruption Thematic Team reviewed the prepared report and approved it in the meeting held on 16 April 2026.

## **II. PROGRESS OF THE INTER-SECTORIAL STRATEGY AGAINST CORRUPTION 2024–2030 AND THE ACTION PLAN 2024–2026**

The Inter-Sectorial Strategy against Corruption 2024–2030 aims to achieve the major objectives of this strategy through the implementation of concrete anti-corruption measures, with the purpose of developing a society in which there is a responsible and efficient system against corruption, capable of delivering tangible results and demonstrating a tendency towards the maximum elimination of corruption threats, as well as the will to prevent and fight corruption. In order to monitor the progress of the ISAC 2024–2030, the monitoring report has been prepared within the framework of the implementation of the Action Plan 2024–2026, covering *the period 1 January 2025 to 31 December 2025*.

### ***2.1 Successfully implemented reforms in the respective year***

The implementation of the Inter-Sectorial Strategy against Corruption contributes to the implementation of the National Strategy for Development and Integration (NSDI), which is the principal national strategic document supporting the country's sustainable social and economic development, ensuring compliance with standards and progress in the European integration process.

The ISAC has identified three main policy goals through which it aims to fulfill its vision, and 16 specific objectives, as follows:

**Preventive Policy** aims to strengthen integrity and prevent corruption in public administration and all state sectors. Particular focus is dedicated to institutions providing public services to citizens.

This policy consists of the following objectives:

- 1.1 Strengthening the legal framework and institutional capacities in the prevention of corruption.*
- 1.2 Strengthening transparency, accountability, and integrity of public institutions at all levels of governance.*
- 1.3 Developing a sustainable approach to preventing corruption in high-risk sectors (high prevalence of corruption).*
- 1.4 Strengthening mechanisms for the prevention of corruption in local self-government units.*
- 1.5 Protecting public finances and assets from misuse in the exercise of public functions.*
- 1.6 Strengthening the whistleblowing framework for the early detection of corruption.*
- 1.7 Strengthening financial transparency and the integrity of political parties.*
- 1.8 Establishing the legislative and institutional framework for lobbying as an instrument for corruption prevention.*
- 1.9 Promoting integrity in the private sector.*

**Punitive Policy** aims to strengthen law enforcement and the rule of law, to sanction corrupt acts in which public officials may be involved, and to guarantee the integrity of state bodies.

This policy consists of the following objectives:

- 2.1 Strengthening the legislative, institutional, and professional capacities for the effective administrative investigation of corruption..*
- 2.2 Strengthening capacities, resources, and performance for effective criminal investigation and prosecution of corruption.*
- 2.3 Strengthening international cooperation of law enforcement agencies and judicial bodies in the fight against corruption, economic crime, and money laundering .*

***Awareness Policy*** aims to involve the public in the fight against corruption, by informing it about state activities against corruption and encouraging it to actively use methods and channels to report it.

This policy consists of the following objectives:

*3.1 Increasing citizens’ awareness of the negative consequences of corruption and encouraging them to oppose, denounce, and report corruption.*

*3.2 Educating young people on ethics, integrity, and proactive engagement in the fight against corruption.*

*3.3 Involving public opinion, particularly the private sector, civil society organizations, and academia, in the fight against corruption.*

*3.4 Strengthening the participation of women in identifying and combating corruption at different levels and sectors.*

***The measurability of the specific objectives of the three policy goals of the ISAC at the objective level is presented as follows:***

By applying the same formula for calculating the degree of achievement of objectives—by summing the achievement percentages of the policy goals and dividing by their number—the achievement of the strategic inter-institutional goal against corruption for the year 2025 is **83.5%**.

| Policy I | Achievement                 |
|----------|-----------------------------|
| 1.1      | 95%                         |
| 1.2      | 100%                        |
| 1.3      | 25%                         |
| 1.4      | 100%                        |
| 1.5      | Not measured <sup>7</sup> % |
| 1.6      | 100%                        |
| 1.7      | 100%                        |
| 1.8      | 100%                        |
| 1.9      | 100%                        |

| Policy II | Achievement |
|-----------|-------------|
| 2.1       | 100%        |
| 2.2       | 54.3%       |
| 2.3       | 65%         |

| Policy III | Achievement |
|------------|-------------|
| 3.1        | 100%        |
| 3.2        | 50%         |
| 3.3        | 100%        |
| 3.4        | 100%        |

The number of institutions involved in the implementation of the Action Plan 2024–2026, during the implementation period *January–December 2025*, is 112, as follows: all line ministries and ministers of state; central-level institutions with administrative competences such as ADG, the State Cadastre Agency, the Property Treatment Agency, the Public Procurement Agency, the Agency for the Administration of Seized and Confiscated Assets, the National Agency for Information Society, the Agency for Local Self-Government Support, the Albanian School of Public Administration, the State Police, the Police Supervision Agency, and independent institutions: the Assembly, the High Judicial Council, the High Prosecutorial Council, the General

<sup>7</sup> Not measured (*ibid* footnote 1).

Prosecutor’s Office, the School of Magistrates, the Special Prosecution Office, the Commissioner for the Right to Information and Protection of Personal Data, the High Inspectorate for the Declaration and Audit of Assets and Conflict of Interest, the Central Election Commission, the General Directorate of Taxation, the General Directorate of Customs, the Security Academy, CTA, and the Financial Intelligence Agency. All municipalities (61) and regions (12).

The implementation of the Inter-Sectorial Strategy against Corruption is carried out through the Action Plan 2024–2026, and for the reporting period *1 January – 31 December 2025*, it consists of 47 measures and 138 activities, divided respectively into: 27 measures and 86 activities for the preventive approach, 10 measures and 31 activities for the punitive approach, and 10 measures and 21 activities for the awareness-raising approach.

The status of their implementation is presented as follows:

| Policy Objectives | Measures and Activities | Implementation of Measures and Activities for the year 2025 |   |  |  |
|-------------------|-------------------------|---|---|--|--|
|                   |                         | Measures and activities foreseen for 2025                   | Fully implemented measures and activities | Partially implemented measures and activities <sup>8</sup> | Not implemented measures and activities <sup>9</sup> |
| Preventive (I)    | Measures                | 27  | 11  | 11   | 5  |
|                   | Activities              | 86  | 53  | 15   | 18   |
| Punitive (II)     | Measures                | 10  | 7   | 3  | 0  |
|                   | Activities              | 31  | 25  | 2  | 4  |
| Awareness (III)   | Measures                | 10  | 6   | 2  | 2  |
|                   | Activities              | 21  | 13  | 3  | 5  |
| <b>Total</b>      | <b>Measures</b>         | <b>47</b>   | <b>24</b>                                 | <b>16</b>  | <b>7</b>   |
|                   | <b>Activities</b>       | <b>138</b>  | <b>91</b>                                 | <b>20</b>  | <b>27</b>  |

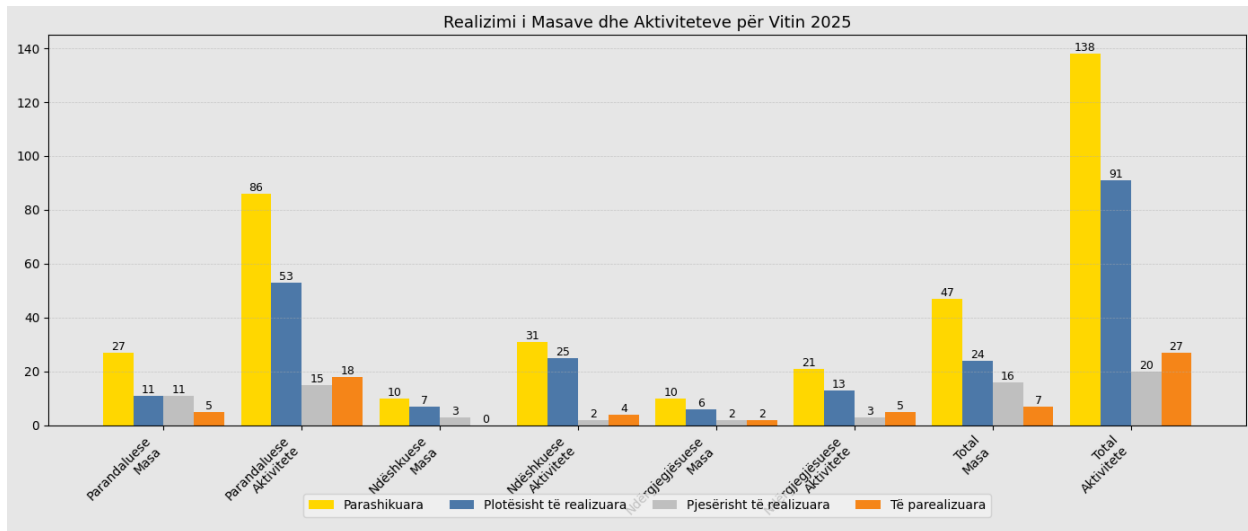
It results that out of a total of 47 measures and 138 activities foreseen for implementation in the Action Plan for the period *January – December 2025*, their status across all three policy objectives is as follows:

- 24 measures and 91 activities fully implemented;
- 16 measures and 20 activities partially implemented (still in the process of implementation);

<sup>8</sup> The activity “partially implemented” is an activity that has been implemented at a level ranging from 50 to 100 percent.

<sup>9</sup> The activity “not implemented” is an activity that has been implemented at a level ranging from 0 to 50 percent.

- 7 measures and 27 activities not implemented.



Based on the above, out of **24 implemented measures and 91 activities**, for *January–December 2025*, specifically 11 measures and 53 activities belong to the Preventive Policy (I), 7 measures and 25 activities belong to the Punitive Policy (II), and 6 measures and 13 activities belong to the Awareness Policy (III).

Out of **16 partially implemented measures and 20 activities**, for *January–December 2025*, specifically 11 measures and 15 activities belong to the Preventive Policy (I), 3 measures and 2 activities belong to the Punitive Policy (II), and 2 measures and 3 activities belong to the Awareness Policy (III).

Out of **7 not implemented measures and 27 activities**, for *January–December 2025*, specifically 5 measures and 18 activities belong to the Preventive Policy (I), 7 activities belong to the Punitive Policy (II), and 2 measures and 5 activities belong to the Awareness Policy (III).

For this period, *January–December 2025*, data have been collected and analyzed for 24 performance indicators, distributed respectively into 15 indicators for the specific objectives under the Preventive Policy, 5 indicators for the specific objectives under the Punitive Policy, and 4 indicators for the specific objectives under the Awareness Policy. During 2025<sup>10</sup>, the target values have been achieved for 16 performance indicators, partially achieved for 4 performance indicators, and not achieved for 2 performance indicators.

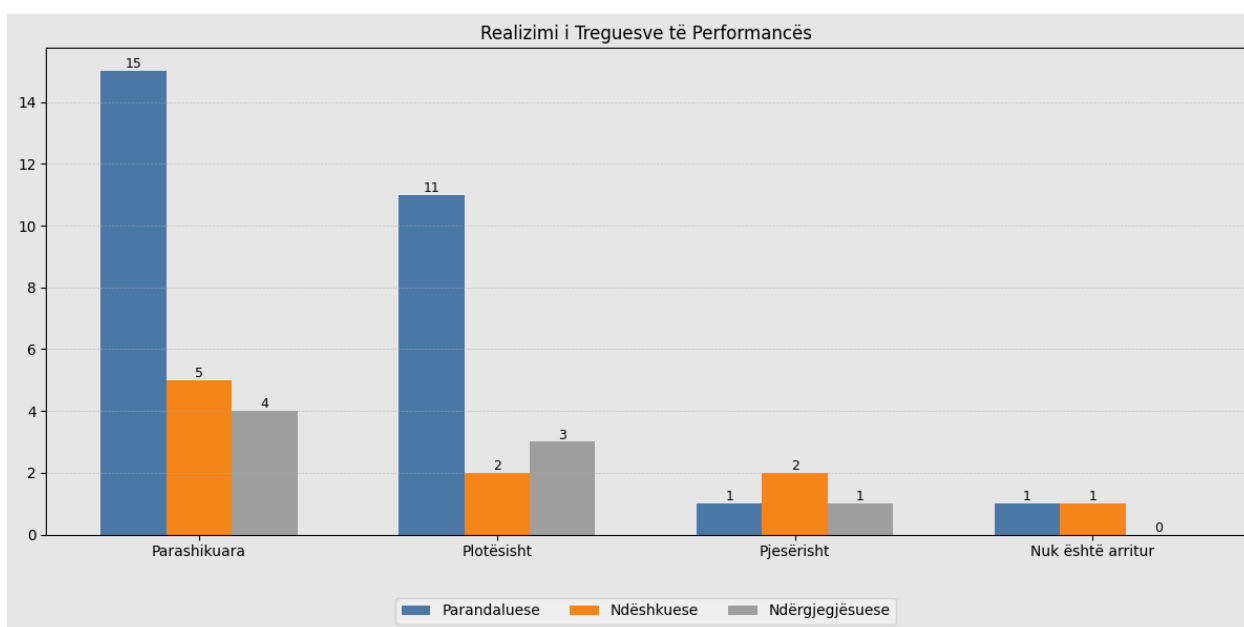
The status of the achievement of their target values is presented as follows:

<sup>10</sup> The targeted values for the monitoring period have been taken into consideration, according to the indicator passport, Annex 2 of the ISAC

| Policy Objectives | Performance Indicators | Achievement of Performance Indicators     |   |   |
|-------------------|------------------------|---|---|---|
|                   |                        | Target value fully achieved <sup>11</sup> | Target value partially achieved <sup>12</sup> | Target value not achieved <sup>13</sup> |
| Preventive (I)    | 15 <sup>14</sup>       | 11  | 1   | 1                                       |
| Punitive (II)     | 5                      | 2   | 2   | 1                                       |
| Awareness (III)   | 4                      | 3   | 1   | 0                                       |
| <b>Total</b>      | <b>24<sup>15</sup></b> | <b>16</b>                                 | <b>4</b>                                      | <b>2</b>                                |

It results that out of a total of 24<sup>16</sup> performance indicators, with annual target values for achievement, for the period *January – December 2025*, their status across all three policy objectives is as follows:

- 16 performance indicators achieved;
- 4 performance indicators partially achieved;
- 2 performance indicators not achieved.



<sup>11</sup> That has been achieved at a level of 100 percent.

<sup>12</sup> That has been achieved at a level ranging from 50 to 100 percent.

<sup>13</sup> That has not been achieved and for which indicators data have not been collected or it has not been possible to collect data.

<sup>14</sup> Indicators 1.5.1 and 1.5.2 have not been measured due to objective constraints.

<sup>15</sup> Ibid footnote 13.

<sup>16</sup> Indicators 1.5.1 and 1.5.2 have been excluded from the measurement.

Based on the above, for **16 performance indicators with achieved target values** for *the year 2025*, specifically 11 belong to the Preventive Policy (I), 2 belong to the Punitive Policy (II), and 3 belong to the Awareness Policy (III).

For **4 performance indicators with partially achieved target values** for *the year 2025*, specifically 1 belongs to the Preventive Policy (I), 2 belong to the Punitive Policy (II), and 1 belongs to the Awareness Policy (III).

For **2 performance indicators with not achieved target values** for *the year 2025*, specifically 1 belongs to the Preventive Policy (I) and 1 belongs to the Punitive Policy (II).

## ***2.2 Impact of the implementation of the strategy in line with the European integration agenda***

The implementation of the Inter-Sectorial Strategy against Corruption 2024–2030 and specifically of the Action Plan during the period January–December 2025 has contributed directly to the fulfillment of Albania’s commitments within the framework of the European integration process, with particular focus on strengthening the rule of law and meeting the criteria of Chapters 23 (Judiciary and Fundamental Rights) and 24 (Justice, Freedom and Security).

The measures undertaken within the framework of the strategy have supported the repeated recommendations of the European Commission and other international actors regarding the need to improve and update the legal framework with new mechanisms, institutional integrity, to increase transparency and accountability in public administration, as well as to effectively combat corruption at all levels of governance.

During the year 2025, there is a mention of satisfactory and timely progress according to deadlines in the drafting of the internal legal framework and its approval by the Assembly, as well as progress with approvals in the Council of Ministers; the establishment of the *baseline* for the creation of mechanisms for the assessment of corruption risk mainly for vulnerable sectors; the strengthening and confirmation of integrity instruments in priority sectors such as the cadastre; the increase of inter-institutional coordination capacities and the strengthening of the role of anti-corruption coordinators in public institutions through the strengthening of the organizational capacities of the General Directorate Against Corruption; data on investigation and criminal prosecution against corruption constitute concrete results, but which need to be further deepened and whose commitment promises the achievement of Albania’s priorities in the fight against corruption. These interventions are closely related to the fulfillment of the required standards for the progress of the negotiating chapters (Chapter 23 and 24), mainly, and with the progress required through the recommendations given in the European Commission progress reports.

Furthermore, the continuity of the harmonization of the measures foreseen in the strategy with the corruption prevention mechanisms defined in the United Nations Convention against Corruption, as well as in the EU Whistleblowing Directive, demonstrates the orientation of the strategy towards alignment with the *acquis* in the field of the rule of law, anti-corruption, and good governance.

From the implementation and monitoring of the Action Plan of the Inter-Sectorial Strategy against Corruption 2024–2026, for the year 2025, it has resulted that the implementation of the measures

and initiatives planned for implementation in several areas has continued, which affect the preventive, punitive, and awareness-raising anti-corruption policy.

**In the field of prevention**, one of the most important achievements of the year 2025, is the preventive approach has been consolidated in accordance with EU standards for integrity in public administration. The legal framework for whistleblowing, lobbying, as well as the preparation for the regulation of donations and sponsorships, has been advanced, while the instruments of preventive analysis have been strengthened through the assessment of the institutional framework and the application of the *Corruption Proofing of Legislation* approach. The approval and the commencement of the implementation of the Corruption Risk Assessment Methodology marks an important step towards a structured and proactive approach in the management of integrity risk, contributing to alignment with the *acquis* and best practices of the EU.

**In the field of punishment**, one of the most important achievements of the year 2025, are the efforts for strengthening inter-institutional coordination between investigative structures and administrative bodies have been further consolidated, improving the mechanisms of referral and follow-up of suspected corruption cases. Progress has been noted in increasing the technical capacities and professional expertise of law enforcement bodies and justice institutions, as well as in the coordinating role of the General Directorate of Anti-Corruption in the follow-up of recommendations and measures. This integrated approach between preventive and punitive mechanisms contributes to increasing the effectiveness of criminal prosecution and is in accordance with EU requirements for strengthening law enforcement and the fight against corruption and criminal prosecution.

**In the field of awareness**, during the year 2025, the public communication approach has been consolidated through interactive and inclusive formats, with a focus on civic education and increasing institutional transparency. Initiatives such as the continuity of the regular publication of the “Anti-Corruption” e-bulletin, the development of awareness activities in universities and the integration of anti-corruption topics into the pre-university curriculum contribute to building a sustainable culture of integrity and to increasing public awareness. These measures are in accordance with the EU approach for promoting integrity and the active involvement of citizens in the prevention of corruption.

### ***2.3 Components that require addressing with the aim of improving implementation***

During the year 2025, which corresponds to the second year of the implementation of the Inter-Sectorial Strategy against Corruption 2024–2030, several aspects have been identified that require improvement in order to increase the effectiveness and coherence of its implementation and for this reason there still remain some components that require further intervention in order to guarantee a more effective and balanced implementation of the strategic objectives.

*Firstly*, progress must be made and the draft law “*On Lobbying*” must be approved within deadlines; the drafting and consolidation of the draft law “*On Donations and Sponsorships*”, and the progress of the process for the draft law “*On Political Parties*”. These acts are recognized as part of the “Anti-Corruption” package of laws.

*Secondly*, progress must be made with implementation through the drafting and putting into implementation of sectoral methodologies for the assessment of corruption risk in all vulnerable sectors mentioned in objective 1.3.

*Thirdly*, the inclusion of the private sector and civil society in the implementation and monitoring of the strategy requires a further increase, through the establishment of sustainable mechanisms of cooperation and transparency.

*Finally*, a further improvement of public awareness for reporting corruption through awareness campaigns, meetings, forums, public activities.

The improvement of these components will directly affect the increase of transparency, accountability and the real impact of the strategy throughout the years of its implementation.

## ***2.4 Overall budget execution***

The financing of the Action Plan is supported by two main sources: the state budget and the financial assistance of international partners (donors).

Within the framework of the monitoring process of the implementation of the measures and activities of the Action Plan for this implementation period, the responsible institutions have been requested to report on the budget planned for the respective year, as well as on the funds used for the achievement of the specific objectives of the strategy, according to the measures and activities carried out.

From the monitoring it is observed that for the Action Plan for implementation in the year 2025, the funds used are reported mainly in a general manner as “administrative costs” and as part of the MTBP of the implementing institutions of the ISAC and the AP, as they are mentioned by the HSA, the SoM and the HIDAACI.

## **III. PROGRESS RELATED TO POLICY OBJECTIVES, SPECIFIC OBJECTIVES, PERFORMANCE INDICATORS AND MEASURES**

This chapter describes the progress achieved within the framework of the fulfillment of the three policies of the ISAC, in relation to each policy objective<sup>17</sup>, specific objective and measures (and activities) of the Action Plan 2024–2026, for the monitoring period *1 January – 31 December 2025*.

Policy objectives and specific objectives become achievable through measures and activities in function of the implementation of the measures, foreseen for implementation by the responsible as well as cooperating institutions of the strategy and the Action Plan.

### ***3.1 Assessment of main achievements using performance indicators***

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<sup>17</sup>Annex No. 1, the Action Plan, of the Inter-Sectorial Strategy against Corruption, approved by Decision of the Council of Ministers No. 859, dated 26.12.2024, Official Gazette No. 255, <https://qbz.gov.al/eli/vendim/2024/12/26/859>.

In accordance with the ISAC, activities have been carried out and measures foreseen in the Action Plan 2024-2026 have been implemented for the reporting period, related to all three policy objectives, respectively prevention (I), punishment (II) and awareness (III).

***Preventive Policy (I) – Summary of achievements in the prevention of corruption***

Through **the objective of the preventive policy**, the ISAC aims the prevention and eradication of corruption in public administration and of all state segments and with a dedicated focus from the institutions that provide public services to citizens. This approach contains the largest number of specific objectives and consequently also of the measures and activities planned to be implemented by the institutions involved in this strategic document of the fight against corruption.

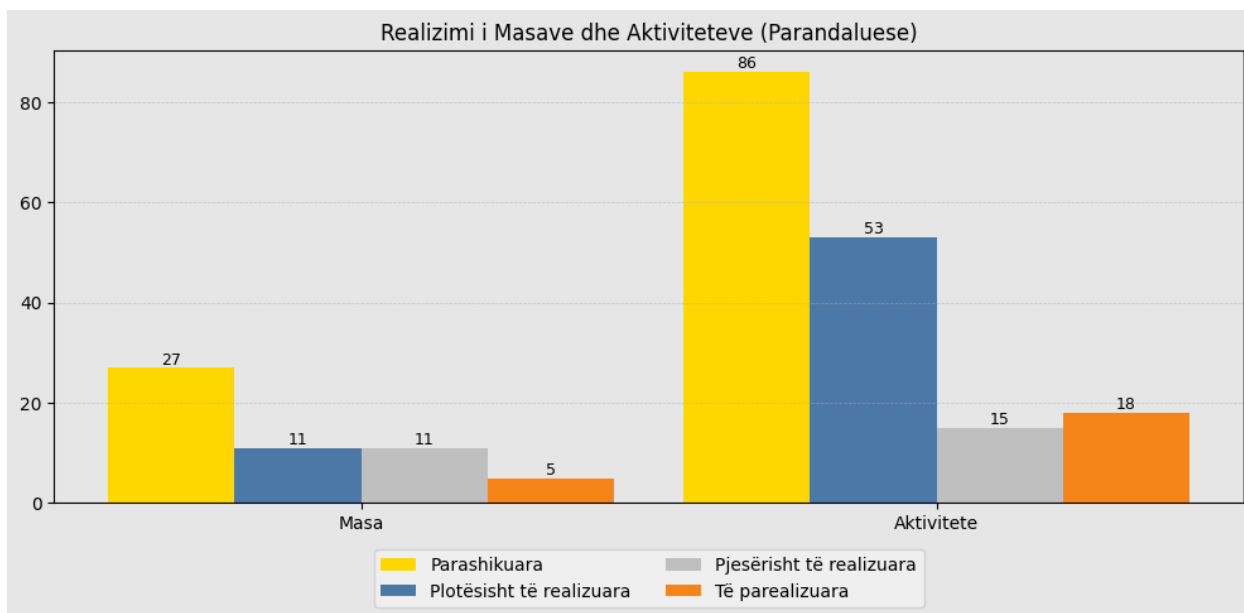
During the reporting period, the measures (products) are implemented and the activities (actions) carried out according to the table below.

| Policy Objectives | Measures and Activities | Implementation of Measures and Activities         |  |  |  |
|-------------------|-------------------------|---|--|--|--|
|                   |                         | Measures and activities planned for the year 2025 | Measures and activities <b>fully</b> implemented | Measures and activities <b>partially</b> implemented <sup>18</sup> | Measures and activities <b>not implemented</b> <sup>19</sup> |
| Preventive (I)    | Measures                | 27  | 11   | 11   | 5  |
|                   | Activities              | 86  | 53   | 15   | 18   |

It results that from 27 measures and 86 activities planned in the Action Plan 2024–2026, for the year 2025, for the Preventive Policy (I) are fully implemented 11 measures and 53 activities, partially 11 measures and 15 activities as well as not implemented 5 measures and 18 activities (measures: 1.3.5, 1.5.1, 1.5.3, 1.6.3, 1.6.4, and activities: 1.1.4.2, 1.2.5.1, 1.3.2.3, 1.3.2.5, 1.3.4.1, 1.3.5.3, 1.4.3.1, 1.4.3.3, 1.5.1.1, 1.5.1.2, 1.5.3.1, 1.5.3.2, 1.5.3.3, 1.6.3.1, 1.6.3.2, 1.6.3.3, 1.6.4.1 and 1.9.1.4).

<sup>18</sup> Activity “partially implemented” is that activity which is implemented to the extent from 50 to 100 percent.

<sup>19</sup> Activity “not implemented” is that which is implemented to an extent from 0 to 50 percent..



From 15<sup>20</sup> performance indicators for the Preventive Policy (I), the target value has been achieved for 11 performance indicators, for 1 it has been only partially achieved and for another 1 (indicator 1.3.2) it has not been achieved.

| Preventive (I) | Performance Indicators | Achievement of Performance Indicators     |   |   |
|----------------|------------------------|---|---|---|
|                |                        | Target value fully achieved <sup>21</sup> | Target value partially achieved <sup>22</sup> | Target value not achieved <sup>23</sup> |
|                | 15 <sup>24</sup>       | 11  | 1   | 1                                       |

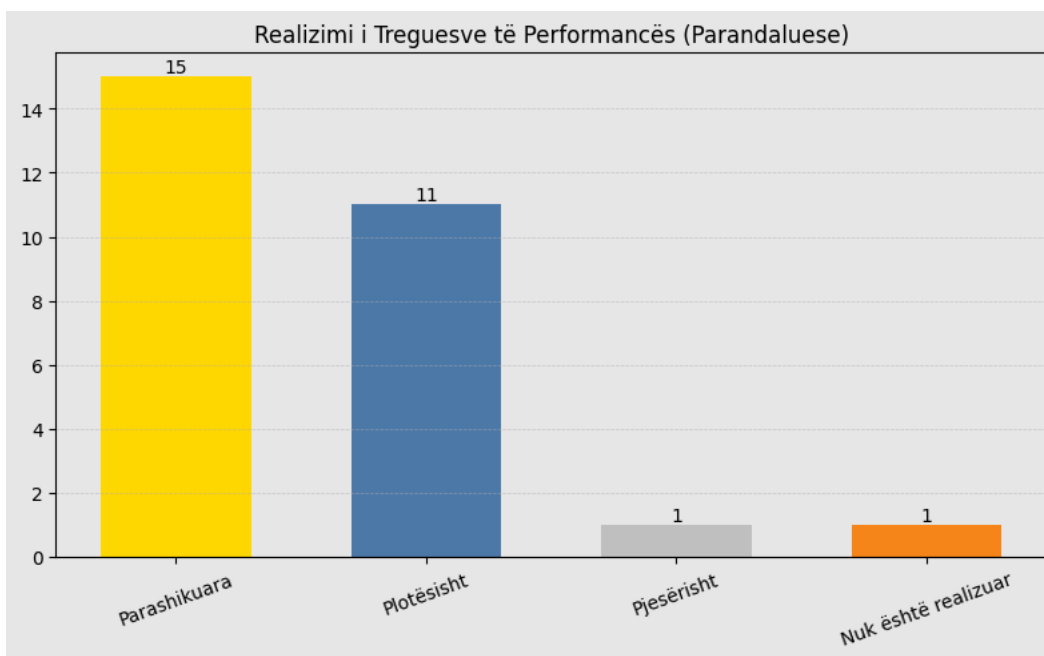
<sup>20</sup> Two of them (1.5.1 and 1.5.2) will not be able to be measured, as their data for the full year 2025 may be reported by the responsible institutions, MoF and HSA, only in May 2026, after being processed by them. The data for these performance indicators will be addressed in the next monitoring report of the ISAC, for 6M1 2026.

<sup>21</sup> That is implemented to the extent of 100 percent.

<sup>22</sup> That is implemented to the extent from 50 to 100 percent.

<sup>23</sup> That is not implemented and an indicator for which data have not been collected or it has not been possible to collect them.

<sup>24</sup> *Ibid* footnote 17 (indicators 1.5.1 and 1.5.2).



### ***1.1 Strengthening of the legal framework and institutional capacities in the prevention of corruption.***

For this objective, 2 performance indicators have been defined:

*1.1.1: Percentage of legal and by-law acts (internal acts and international agreements) adopted out of those planned to be adopted.*

*1.1.2: Percentage of central and local public institutions that have established and operationalized anti-corruption structures.*

The Action Plan for Objective 1.1, in the period January-December 2025, foresees 16 activities and 4 measures.

*1.1.1: Percentage of legal and by-law acts (internal acts and international agreements) adopted out of those planned to be adopted.*

The target value for *performance indicator 1.1.1* for the year 2025 is: All laws (other acts) foreseen for adoption by the Roadmap and in the list of acts (Analytical Plan of Acts), adopted.

To achieve the performance indicator values in accordance with the performance indicators passport and specifically with the 2024-2026 action plan, (5) activities and (2) measures have been foreseen respectively, as follows.

|         |  |
|---------|--|
| 1.1.1   | Strengthening of the legal framework for the prevention of corruption  |
| 1.1.1.2 | Adoption of legislative amendments and by-law acts (foreseen) for the prevention of corruption, including:<br>- Law on the Asset Recovery Office |

|         |  |
|---------|--|
|         | - Law on Whistleblowing and Protection of Whistleblowers<br>- Law on the Prevention of Conflict of Interest in the Exercise of Public Functions, as well as any other act (legal and by-law) related to the anti-corruption field.     |
| 1.1.1.3 | Conducting an analysis and drafting an initial draft based on EU country models of legislation on transparency of political party financing, as well as presenting proposals to parliamentary committees.                              |
| 1.1.2   | Improvement of administrative procedures in the preparation and approval of legislation for the prevention of corruption   |
| 1.1.2.1 | Methodology (Manual) for the Assessment of Spaces for Corruption in laws ( <i>Corruption Proofing of Legislation</i> ), for the services of the Assembly (approval of the Manual)  |
| 1.1.2.2 | Conducting the assessment according to the Methodology drafted in activity 1.1.2.1, of the laws and opinions/analyses drafted  |
| 1.1.2.3 | Conducting the process of Assessment of Spaces for Corruption during the drafting of acts by the structures involved in the process (in implementation of the Legislative Drafting Manual)   |
| 1.1.2.4 | Strengthening the capacities of the technical staff of the legal directorates and policy directorates within the ministries and of the services of the Assembly, for the process of Assessment of Spaces for Corruption in Legislation |

The implementation of the foreseen measures is carried out through activities that continue throughout the entire year with measurable values of the adopted acts and for which the required assessment has been carried out, on a 6-month and annual basis.

During *January – December 2025*, there has been concrete progress in the direction of the adoption of legal acts in the anti-corruption field. The Assembly of the Republic of Albania adopted the law “On the Asset Recovery Office” in the plenary session of 26 June 2025. Law No. 44/2025<sup>25</sup> “On the establishment of the Asset Recovery Office” fulfills an obligation of Albania and will facilitate the process of tracing and identification, and international cooperation, within the framework of asset recovery. The law defines the rules for the establishment, organization, functioning, determination of responsibilities and procedures of cooperation of the ARO. Further, within the framework of the implementation of this law, the Minister of Interior has approved Instruction No. 203, dated 27.11.2025, for the determination of the rules and procedures for the selection of the candidate for Director of the Asset Recovery Office. The approval of this instruction contributes to the standardization and transparency of the procedures for the selection of the Head of the Asset Recovery Office, strengthening the principles of meritocracy and integrity in appointments.

The Assembly of the Republic of Albania adopted Law No. 96/2025 “On Whistleblowing and the Protection of Whistleblowers” in the plenary session of 18 December 2025. The law aligns the country’s internal legal framework with Directive No. 2019/1937/EU of the European Parliament and of the Council, dated 13 October 2019, “on the protection of persons who report breaches of

<sup>25</sup> <https://parlament.al/dokumentacioni/aktet/82512743-08b7-4891-99d1-5837e8cdd38a> and <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202507031335093415ligj%20nr.%2044%2C%20dt.%2026.6..2025.pdf>

Union law”. CELEX No. 32019L1937, Official Journal of the European Union, Series L, No. 305, dated 26.11.2019, pages 17–56.

This law establishes a complete and unified framework for the reporting of violations and suspected cases of corruption in the public and private sectors, ensuring effective protection for whistleblowers, the safeguarding of confidentiality, and the clear functioning of internal and external reporting channels. The new legal approach aims to strengthen individuals’ trust to report in good faith and to significantly increase institutional capacity for the identification and addressing of violations. The by-laws for the implementation of the law are in the process of drafting and adoption and will be completed within the first 6 months from the entry into force of the law.

The Draft Law “On the Prevention of Conflict of Interest in the Exercise of Public Functions” has, since October 2025, initiated parliamentary procedures in the Assembly of the Republic of Albania. The Special Parliamentary Committee “For the Deepening of Reforms for Good Governance, the Rule of Law and Anti-Corruption for Albania 2030 in the European Union” consolidated the draft and proposed to the Assembly its examination and approval. Public consultation tables have been held for the act<sup>26</sup> and opinions have been provided by the Council of Ministers. By the end of December 2025, the draft law was subjected to review in all parliamentary committees and was forwarded for approval in January 2026 with the beginning of the new parliamentary session<sup>27</sup>.

The Assembly of the Republic of Albania has completed an analysis and the drafting of the initial draft of the law on the financing of political parties, based on the models of EU countries’ legislation on the transparency of political party financing. The aforementioned analytical document has been prepared, also included in the program of the analytical document of the Special Parliamentary Committee<sup>28</sup>. The analysis has focused on the practices of declaring sources of financing, restrictions on donations, reporting mechanisms, and the role of supervisory and auditing institutions. This document has been shared with high-level experts attached to this Committee, as well as with representatives of public institutions, civil society organizations, interest groups, and international partners, and the preparatory work for the drafting of a legal draft “On the financing of political parties” has commenced. The report document was distributed and the first public consultation meeting was organized<sup>29</sup>, for it as well.

In 2025, the document Methodology for the Assessment of Spaces for Corruption in Laws (CPL) was adopted. By decision of the Conference of Leaders, No. 1, dated 20.01.2025, the “Methodology for the Assessment of Spaces for Corruption in Laws” was approved for the services of the Assembly<sup>30</sup>. The Methodology has been made part of the content of the Rules of Procedure of the Assembly, by decision No. 6, dated 30.1.2025, and certain amendments have

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<sup>26</sup> <https://www.parlament.al/lajme/ee7167e1-8e42-4701-89c5-71bd5aec4533> and <https://masl.al/ligji-te-ri-per-parandalimin-e-konfliktit-te-interesave-ekspertet-mblidhen-ne-kuvend-per-tryezen-e-pare-te-konsultimit-publik/>.

<sup>27</sup> The law “On the prevention of conflict of interest in the exercise of public functions” in the plenary session of 3 February 2026.

<sup>28</sup> <https://masl.al/tre-panele-diskutimi-prezantohet-drafti-i-planit-kombetar-te-veprimit-per-mireqeverisjen-antikorrupsionin-dhe-sundimin-e-ligjit/>

<sup>29</sup> <https://www.parlament.al/lajme/6bd2aa69-45ca-458d-80b2-0ae8ccbd9aec>

<sup>30</sup> <https://www.parlament.al/kalendar/2025-01-20T11:00:00+01:00>

been approved to Decision of the Assembly No. 166, dated 16.12.2004, “On the approval of the Rules of Procedure of the Assembly of the Republic of Albania”, as amended, where the implementation of the Methodology for the Assessment of Spaces for Corruption in Laws has also been reflected. With reference to the carrying out of this assessment, according to and in accordance with the Methodology, the process has been carried out specifically by the services of the Assembly for 8 acts (draft laws), as follows: the draft law “On the Protection of Personal Data”, the draft law “On the Mountain Package”, the draft law “On the State Material Reserves”, the draft law “On Concessions and Public-Private Partnership”, the draft law on the Agency for Supervision in the System of Execution of Penal Decisions”, the draft law “On certain amendments and additions to Law No. 95/2015, “On Biocidal Services and Products in Public Health”, as amended”, the draft law “On the extended responsibilities of producer entities of products that generate waste”, and the draft law “On the prevention of conflict of interest in the exercise of public functions”. The first three acts have been carried out together with technical assistance of external experts, from civil society, respectively from the organization Western Balkans Fund for Democracy.

With regard to the carrying out of the assessment process for other legal and sub-legal acts adopted by the Council of Ministers, the Directorate General of Codification and Harmonization of Legislation at the Ministry of Justice has carried out the assessment of spaces for corruption in legislation (CPL) for a total of 1,050 draft acts, of which 140 are draft laws and 1,010 are decisions of the Council of Ministers, for the year 2025. As part of this process, the law “On the Establishment of the Asset Recovery Office” from the Ministry of Interior has also been subject to this assessment, in implementation of the Legislative Drafting Manual.

With reference to the strengthening of the technical capacities of institutions with drafting and assessment competencies, the staff of the Services of the Assembly has been assisted and has shared field experience with partners such as the Western Balkans Fund for Democracy organization<sup>31</sup>. During the month of October 2025, two activities were organized for the strengthening of the capacities of newly elected Members of Parliament and the technical staff of the Assembly. Furthermore, in the year 2025 (December 2025), two two-day training sessions were organized, in cooperation with the Regional Anti-Corruption Initiative (RAI), focusing on strengthening the capacities of the technical staff of the legal and policy directorates within the Ministry of Interior and the Ministry of Environment, regarding the process of Assessment of Spaces for Corruption in Legislation. The trainings focused on increasing knowledge and practical skills for the identification, analysis, and management of corruption risks, as well as on the implementation of international best practices and standards in the drafting and assessment of legislation. On 4 and 5 December 2025, experts and technical staff of the State Police, the Ministry of Interior, and the Ministry of Environment were provided with working practices and case discussions for the analysis of the existing legal framework and the assessment of its compliance with international anti-corruption standards.

As stated above, the measures and activities foreseen for the year 2025 have directly influenced the target value of performance indicator 1.1.1. In conclusion, it is assessed that during the year 2025, the drafting and consolidation of the process for the adoption of the legal acts foreseen in

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<sup>31</sup> Eng: *Western Fund for Democracy*.

the evaluation report of 2024, as referred to in the monitoring report of ISACC 2024, has continued, and also as part of the list of legal acts in the Roadmap for the Rule of Law for Chapters 23 and 24, as well as foreseen in the General Analytical Plan of Acts for the year 2025. More specifically, Law No. 44/2025 “On the Establishment of the Asset Recovery Office” and the sub-legal act implementing it, Instruction No. 203, dated 27.11.2025, “On the determination of the rules and procedures for the selection of the candidate for Director of the Asset Recovery Office” have been adopted; Law No. 27/2025 “On the approval of the normative act, with the force of law, No. 4, dated 7.5.2025, “On an addition to Law No. 8668, dated 23.10.2000, “On providing Albanian citizens with passports for abroad”, as amended; and Law No. 96/2025, “On Whistleblowing and the Protection of Whistleblowers”. During the month of December 2025, the parliamentary review procedures of the draft law “On the prevention of conflict of interest in the exercise of public functions” continued. On (13 May 2025), Law No. 99/2024, “On inspection in the Republic of Albania”, entered into force, which ensures a preventive and educational approach in reducing corruption in the inspection system. During this year, 5 sub-legal acts have also been adopted in implementation of this law. With reference to the measurement formula of the indicator for this monitoring period, this performance indicator has been achieved at a level of 90%.

The presentation of the achievement of the indicator according to the Indicator Passport is as follows:

|                                    |                             |  |
|------------------------------------|-----------------------------|--|
| <b>Baseline Values</b>             | 2023                        |  |
|                                    | N/A                         |  |
|                                    | 2024                        | Preparation of the evaluation and establishment of the baseline value for monitoring                                     |
|                                    | 2025                        | All laws (other acts) foreseen for approval from the Roadmap and in the list of acts (Analytical Plan of Acts), approved |
|                                    | 2026                        | All laws (other acts) foreseen for approval from the Roadmap and in the list of acts (Analytical Plan of Acts), approved |
|                                    | 2027                        | All laws (other acts) foreseen for approval from the Roadmap and in the list of acts (Analytical Plan of Acts), approved |
|                                    | 2028                        | All laws (other acts) foreseen for approval from the Roadmap and in the list of acts (Analytical Plan of Acts), approved |
|                                    | 2029                        | All laws (other acts) must be approved before 2029, unless there are other additions in the evaluation                   |
|                                    | 2030                        | Të gjitha ligjet (aktet e tjera) duhet të miratohen para vitit 2029, përveç nëse ka të tjera shtesë në vlerësim          |
|                                    | <b>Target Value/ Target</b> | <b>Year 2025 (targeted target)</b>   |
| <b>Year 2025 (achieved target)</b> |                             | <b>90%</b>   |

1.1.2: *The percentage of central and local public institutions that have established and operationalized anti-corruption structures.*

The target value for *performance indicator* 1.1.2 for the year 2025 is: 80% of public institutions have anti-corruption structures.

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, the following activities (11) and measures (2) are foreseen as follows.

|         |  |
|---------|--|
| 1.1.3   | Strengthening the institutional framework and technical professional capacities for the prevention of corruption   |
| 1.1.3.1 | Assessment of the institutional and organizational framework of institutions with competencies in the fight against corruption (evaluation report/analysis)  |
| 1.1.3.2 | Identification of needs for improving human, technical, and financial resources of institutions responsible for the prevention of corruption   |
| 1.1.3.5 | Appointment of anti-corruption coordinators, anti-corruption contact points, integrity coordinators, and coordinators for the right to information   |
| 1.1.3.6 | Guidelines and informative meetings (2 meetings/year) with Anti-Corruption Contact Points on anti-corruption analyses  |
| 1.1.3.7 | Identification of training needs for anti-corruption coordinators, anti-corruption contact points, integrity coordinators, and coordinators for the right to information, cooperation and coordination                                 |
| 1.1.3.8 | Capacity building and continuous qualification for anti-corruption coordinators, anti-corruption contact points, integrity coordinators, and coordinators for the right to information (training and information sessions carried out) |
| 1.1.4   | Strengthening the institutional framework and technical professional capacities for the prevention of corruption   |
| 1.1.4.1 | Signing of cooperation agreements (bilateral and multilateral) between institutions with competencies in anti-corruption prevention  |
| 1.1.4.2 | Lidhja e marrëveshjeve të bashkëpunimit (dy-palëshe dhe shumë-palëshe) mes institucioneve me kompetenca parandalimi kundër korrupsionit  |
| 1.1.4.3 | Strengthening of the Thematic Anti-Corruption Team (members of ISAC implementing institutions) for coordination of information and monitoring report data  |
| 1.1.4.4 | Technical meetings and discussion forums of the members of the Thematic Anti-Corruption Team (members of ISAC implementing institutions) in preparation for the finalization of reports and data                                       |

The implementation of the planned measures is carried out through activities that continue throughout the year with measurable values from the conducted analysis report, assessment, established structures, and strengthened and improved professional capacities, on a 6-month and annual basis.

Regarding the output of the institutional and organizational framework assessment of institutions with competencies in the fight against corruption, it was carried out ahead of the deadline and can also be found in the ISAC monitoring report for 2024 (pages 29–30)<sup>32</sup>.

During *January–December 2025*, the identification of needs and the addressing of requirements for staffing with anti-corruption prevention competencies in public authorities has continued. The preparation of an analytical report on this matter has been completed, and the document provides a comprehensive overview of anti-corruption structures, as well as the need for their improvement and updating, in order to aim at their better organization and increased efficiency<sup>33</sup>.

Employees with competencies in corruption prevention (anti-corruption coordinators, anti-corruption contact points, integrity coordinators, and coordinators for the right to information) continue to operate regularly. By the end of 2025, there are 20 anti-corruption coordinators with full responsibilities, 78 integrity coordinators (at central level and their subordinate institutions), and 44 at the local level, as well as 367 public authorities that have designated a coordinator for the right to information.

Regarding the development of trainings and continuous qualification for anti-corruption coordinators, anti-corruption contact points, integrity coordinators, and coordinators for the right to information, during this period two dedicated sessions were held in February<sup>34</sup> and June<sup>35</sup> by the Albanian School of Public Administration, on the topics “Implementation of anti-corruption and conflict of interest policies” and “Strengthening the culture of integrity and anti-corruption mechanisms,” with a dedicated audience of anti-corruption coordinators and contact points, totaling 41 participants from all line ministries and central agencies.

In December 2025, the preparation of a technical manual by the General Directorate of Anti-Corruption was also finalized, which will serve as an additional supporting instrument for the implementation and monitoring of the Anti-Corruption Strategy. After its approval by the Minister of State for Public Administration and Anti-Corruption, it will assist Anti-Corruption Contact Points in facilitating the implementation and monitoring of the ISAC.

The Albanian School of Public Administration has also conducted, for 2025, a training needs assessment for all public administration employees, based on the strategic framework, legal framework, periodic assessments, and specific institutional needs. This training needs report is carried out in cooperation with experts and heads of technical structures of prevention authorities, such as the General Directorate of Anti-Corruption.

In 2025, ASPA organized three trainings for anti-corruption contact points on the topics “*Implementation of anti-corruption and conflict of interest policies*,” “*Strengthening the culture*

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<sup>32</sup> For more information, please refer to: [www.masl.al](http://www.masl.al) and: <https://masl.al/antikorrupsioni/>, as well as the Analytical Document published at the following link: <https://masl.al/wp-content/uploads/2025/04/SHTYLLA-I-MIREQEVERISJA-ANALIZA-FINALE-JANAR-2025.pdf>.

<sup>33</sup> Refer to the data included in the 2024 ISAC Annual Monitoring Report (page 30).

<sup>34</sup> 17 February 2025.

<sup>35</sup> 10 June 2025.

*of integrity and anti-corruption mechanisms,”* and *“Strengthening institutional accountability: Ethics, information, anti-corruption mechanisms,”* with a total of 61 participants from line ministries and subordinate institutions. Additionally, five specialized trainings were conducted for coordinators for the right to information on the topic *“Strengthening Public Transparency: Implementation of Law No. 119/2014 and the Standards of the Tromsø Convention,”* with 139 participants..

In 2025, institutional cooperation among institutions with preventive competencies against corruption has continued. The Ministry of Tourism and Environment has increased transparency through a higher number of publications of documents related to the budget, projects, and other activities initiated by it. It has improved the internal audit process (increase in the number of controls and the quality of control), and has also started work on establishing a dedicated online platform for tourism and environment statistics.

The National Food Authority has taken steps to strengthen audit functions, increase internal control, and implement preventive anti-corruption measures. Contacts with other supervisory institutions have been strengthened, and cooperation practices have been followed in sensitive cases of inspection and administrative investigation. Targeted controls have been carried out focusing on verifying issues considered high risk (for certain imports), where shortcomings were identified, but corrective measures were also taken and reports were prepared for senior management. Areas identified as necessary for increased cooperation include: the Environmental Inspectorate, municipalities (which are involved as actors in the process of product disposal), as well as NAIS for the implementation of digital systems at Border Crossing Points to avoid the risk of errors.

The Agency for Agricultural and Rural Development, within the framework of strengthening audit functions, has filled vacant positions with experienced auditors and increased internal control and the implementation of preventive anti-corruption measures. Contacts with other institutions have been strengthened and cooperation practices have been followed in sensitive cases of audit, internal and external reporting, as well as administrative and financial investigations. Institutions identified as necessary for increased cooperation include municipalities (involved in the process of issuing permits for applicants of ARDA), NAIS for the implementation of digital application systems, as well as the National Environment Agency, the National Tourism Agency, the National Food Authority, etc., in the role of technical certifying bodies.

The Directorate of Anti-Corruption and Professional Standards within the General Directorate of Customs has handled 45 cases of denunciations/complaints and requests for information on customs procedures, received through the Green Number and the email address [antikorrupsion.dpd@dogana.gov.al](mailto:antikorrupsion.dpd@dogana.gov.al) , as well as cases delegated by the General Director.

The Minister of State for Public Administration and Anti-Corruption, in the capacity of National Anti-Corruption Coordinator and Head of the Thematic Anti-Corruption Team, has provided data and informed the members of this group, deputy ministers of line ministries, and senior representatives of the HSA, HIDAACI, the CRIPCI, and the PPA on sector initiatives, evaluation reports, monitoring, and other anti-corruption policies.

During the months of March–May and October 2025, information was provided electronically and through meetings<sup>36</sup> or the preliminary and consultative treatment of anti-corruption data, in reference to the planning in the ISAC for 2025.

Meanwhile, for 2025, no agreements have been signed nor new cooperation agreements initiated between institutions (activity 1.1.4.1).

As stated above, the measures and activities foreseen for 2025 have had a direct impact on the target value of performance indicator 1.1.2. In conclusion, it is assessed that during 2025, public institutions have established and identified anti-corruption structures and carry out duties and functions with corruption prevention competencies.

In implementation of the Prime Minister’s Order No. 49, dated 26.03.2025, “*On the establishment of the inter-institutional group and inter-institutional technical groups for the reorganization and restructuring of inspectorates in the Republic of Albania, for the drafting of sub-legal acts in function of the implementation of the law on inspection, as well as for the development and improvement of the electronic inspection system ‘e-Inspection’*”, the General Inspectorate is leading the reform in the field of inspections and chairs the working groups for drafting decisions of the Council of Ministers, in function of the implementation of Law No. 99/2024 “On inspection in the Republic of Albania”. The Network of Anti-Corruption Contact Points for the implementation of the ISAC has been consolidated; in 367 public authorities, coordinators for the right to information have been appointed; 185 Responsible Units for whistleblowing in the public sector and 526 Responsible Units in the private sector are functional; 78 institutions have approved and published their Integrity Plans and have appointed integrity coordinators, as well as initiated the appointment of ethics coordinators. Referring to the target value for this performance indicator, it results that it has been achieved at 100%.

The presentation of the achievement of the indicator according to the Indicator Passport is as follows:

|                        |      |  |
|------------------------|------|--|
| <b>Baseline Values</b> | 2023 |  |
|                        | N/A  |  |
|                        | 2024 | Preparation of the assessment and establishment of the baseline value for monitoring |
|                        | 2025 | 80% of public institutions have anti-corruption structures                           |
|                        | 2026 | 90% of public institutions have anti-corruption structures (cumulative)              |
|                        | 2027 | 100% of public institutions have anti-corruption structures (cumulative)             |
|                        | 2028 | 100% of public institutions have anti-corruption structures (cumulative)             |
|                        | 2029 | 100% of public institutions have anti-corruption structures (cumulative)             |
|                        | 2030 | 100% of public institutions have anti-corruption structures (cumulative)             |

<sup>36</sup> 6 may 2025.

|                                  |  |  |
|----------------------------------|--|--|
| <b>Target Value<br/>/ Target</b> | <b>Year 2025 (targeted target)</b>         | 80% of public institutions have anti-corruption structures |
|                                  | <b>Year 2025 (achieved target)</b><br>100% | <b>100%</b>  |

### **Level of achievement of Objective 1.1**

The level of achievement of *Objective 1.1 “Strengthening the legal framework and institutional capacities in the prevention of corruption”* in relation to the achievement of performance indicators for the year 2025 is **95%**

The calculation has been carried out by measuring and identifying the data and information included in this report, in accordance with the provisions set out in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The calculation has been carried out according to the following formula:

$$NR\ 1.1 = \frac{TP\ 1.1.1\ (90\%)+\ TP\ 1.1.2\ (100\%)}{2\ TP} \times 100\% = 95\%$$

### **Data verifiability**

The reported data on performance indicators are based on the information reported by the General Directorate of Anti-Corruption for monitoring the implementation of the action plan for 2025 and the values of the performance indicators.

### **Risks for the achievement of Objective 1.1**

For 2025, there is a moderate risk, such as delays in the progress of parliamentary procedures for the planned legal acts, as mentioned for the law on the prevention of conflict of interest in the exercise of public functions. It is also noted that the appointment of ethics coordinators in public authorities should continue.

## ***1.2 Strengthening transparency, accountability, and integrity of public institutions at all levels of governance.***

For this objective, 3 performance indicators have been defined:

*1.2.1: Percentage of central and local public institutions that use an electronic register of requests and responses (increasing trend).*

*1.2.2: Percentage of asset and private interest declarations submitted and audited, out of the total number required to be submitted.*

*1.2.3: Percentage of public institutions (central, local) that have drafted Integrity Plans (increasing trend).*

The Action Plan for Objective 1.2, during the period January–December 2025, foresees 19 activities and 5 measures.

1.2.1: *Percentage of central and local public institutions that use an electronic register of requests and responses (increasing trend).*

The target value for *performance indicator 1.2.1* for the year 2025 is: At least 70% of the foreseen public institutions have installed and are using the electronic register of requests and responses.

In order to achieve the indicator values in accordance with the performance indicator passport and specifically with the 2024–2026 Action Plan, the following activities (5) and measure (1) are foreseen as follows .

|         |  |
|---------|--|
| 1.2.1   | Strengthening the transparency of public institutions at all levels of governance  |
| 1.2.1.2 | Usage statistics of the e-Albania platform for public services by citizens on a 6-month basis  |
| 1.2.1.3 | Installation of the Electronic Register of Requests and Responses for the right to information in public authorities, as determined based on the assessment of the Commissioner for the Right to Information, for all levels of governance |
| 1.2.1.4 | Preparation and publication of a Guideline (Manual) for users on the right to information (explanation of citizens' rights and the procedure for free access to information)   |
| 1.2.1.5 | Drafting of a summary of the decision-making of the Commissioner for the Right to Information on issues of public interest and cases of limitation of information, concepts of confidentiality and protection of personal data (annual)    |
| 1.2.1.6 | Continuous trainings/information sessions on the right to information for administrative bodies and the public   |

The implementation of the foreseen measure is carried out through activities that continue throughout the year with measurable values related to the identification of institutions, the use of services on e-Albania, the establishment of the Electronic Register of Requests and Responses for the right to information, preparation of materials, data on the right to information, etc., on a semi-annual and annual basis.

*During January–December 2025*, the e-Albania portal recorded 3.43 million users, citizens and businesses, an increasing number compared to 2024 (3,166,983 users). During 2025, 62 million public services were obtained through e-Albania and a total of 51 million documents with electronic seal were generated, reflecting a steady increase in the use of digital public services. Of these, 8.7 million public services were obtained in the first 6 months of 2025, compared to 7.3 million public services obtained in the same period of 2024 (about 20% more). Meanwhile, during the second 6 months of 2025, 8.6 million public services were obtained, compared to 7.9 million public services obtained in the same period of 2024 (about 10% more). The monthly average of public services for 2025 results in 1.45 million services, increasing compared to the monthly average of 2024, which was about 1.2–1.3 million public services per month, reflecting a significant increase in the use of the platform by citizens and businesses .

Regarding documents and acts with electronic seal, in 2025 a total of 12.1 million were generated (6M1 2025, 6.1 million documents with electronic seal were generated, and in the 6M2 2025, 6 million documents were generated). Regarding online public services on the e-Albania portal, 1,266 public services were provided online, representing about 95% of all public services,

confirming the consolidation of e-Albania as the main channel for the provision of digital public services and its contribution to increasing transparency, efficiency, and citizens' access to public services .

In 2025, the installation of the Electronic Register of Requests and Responses (ERRR) for the right to information was carried out in 25 new public authorities, as planned, bringing the total number to 272. This process has continued simultaneously with the development and delivery of regular trainings with coordinators for the right to information and on the manner of its use . The authorities mentioned include: the Agency for Innovation and Excellence, the Quality Assurance Agency for Pre-University Education (QAAPE), the Agency for Quality Assurance in Health and Social Care, the National Cannabis Control Agency, the State Agency for the Support and Development of Start-ups and Facilitators, the Central Technical Construction Archive, the Regional Directorate of Cultural Heritage Berat, IdentiTek Sha, Illyrian Guard Sha, the Institution of the President of the Republic of Albania, the Institute of Construction, the Committee for National Minorities, the Albanian Investment Corporation Sha, the Dibër Regional Council, the Reception Center for Asylum, the National Center of Cinematography, the National Center of Culture for Children, the National Center for Books and Reading, the National Center of Traditional Activities (NCTA), the National Biomedical Technical Center, the Inter-Institutional Center Albanian Academic Network – AAN, the Albanian School of Public Administration, Borrowing Companies under Administration, the National Theatre of Opera, Ballet and Folk Ensemble, and the Diaspora Publishing Center. During this year, through the Electronic Register of Requests and Responses (ERRR), 426 requests for information were submitted by citizens and interest groups, while 28 complaints were filed with the Office of the Commissioner.

The Office of the Commissioner for the Right to Information has drafted the “Explanatory Manual on the Right to Information,” designed in a question-and-answer format, with the aim of providing clear and simplified information on procedures and the right of access to information. The manual has been published on the official website <sup>37</sup> of the institution and was first presented during the VII National Conference on the Right to Information.

The Office of the Commissioner has identified and selected decision-making cases with the aim of preparing a summary of the Commissioner's decisions on issues of public interest and cases of limitation of information, concepts of confidentiality, and protection of personal data (annual) of public interest. The summary document remained in process until the end of December 2025 .

During 2025, two trainings were conducted with coordinators for the right to information, focusing on amendments to the law on the right to information and the innovations introduced by these changes, as well as their practical implementation in concrete cases. Newly appointed coordinators for the right to information were introduced to specific obligations regarding the publication and updating of the register of requests and responses, as well as the use of the Electronic Register of Requests and Responses. The Office of the Commissioner conducted two trainings with newly appointed coordinators for the right to information and, in cooperation with ASPA, five certified training cycles were conducted, dedicated to coordinators for the right to information, focusing on legal changes in the field of the right to information, as well as the standards of Council of Europe

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<sup>37</sup> <https://idp.al/wp-content/uploads/2025/10/Manual-DDI-Light-2025.html>

Convention No. 205 “On Access to Official Documents” (Tromsø Convention). In total, 139 coordinators were trained and certified by ASPA .

As stated above, the measures and activities foreseen for 2025 have had a direct impact on the target value of performance indicator 1.2.1. During 2025, the CRIPCI has continued and installed, as planned, the Electronic Register of Requests and Responses . 25 new authorities (as mentioned above) have been equipped with the register, bringing the total number of public authorities to 272, compared to 247 at the end of 2024. At the same time, regular trainings have been conducted with coordinators on how to use it. Referring to the target value for this performance indicator, it results that it has been achieved at 100%.

Presentation of the achievement of the indicator according to the Indicator Passport is as follows:

|                        |                                    |   |
|------------------------|------------------------------------|---|
| <b>Baseline Values</b> | 2023                               |   |
|                        | N/A                                |   |
|                        | 2024                               | Preparation of the evaluation and establishment of the baseline for monitoring  |
|                        | 2025                               | At least 70% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | 2026                               | At least 75% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | 2027                               | At least 80% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | 2028                               | At least 85% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | 2029                               | At least 90% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | 2030                               | At least 95% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
| <b>Target Value</b>    | <b>year 2025 (targeted target)</b> | At least 70% of the foreseen public institutions have installed and are using the electronic register of requests and responses |
|                        | <b>Year 2025 (achieved target)</b> | <b>100%</b>   |

1.2.2: *Percentage of asset declarations and private interests, submitted and audited, from the total number that must be submitted.*

The target value for performance indicator 1.2.2 for the year 2025 is: 100% of declarations submitted and audited according to the legal obligations for submission and audit.

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, the following activities (6) and measure (1) are foreseen as follows.

|         |  |
|---------|--|
| 1.2.2   | Strengthening the accountability of public institutions at all levels of governance  |
| 1.2.2.1 | Continuous monitoring of the submission of asset and private interest declarations for all declaring subjects through the EACIDS system  |
| 1.2.2.2 | Improvement of the methodology for verification and full control of asset and private interest declarations  |
| 1.2.2.3 | Establishment of registers of gifts and favours given to public officials and employees according to the requirements of the legislation in force (drafting of a register model and sending it for implementation to institutions) |
| 1.2.2.4 | Strengthening the role of internal audit in institutions through continuous trainings on anti-corruption (1) and access to information (2)   |
| 1.2.2.5 | Qualification of human resources staff in strengthening institutional accountability on ethics issues, information, and anti-corruption mechanisms through initial and continuous trainings  |
| 1.2.2.6 | Information sessions on conflict of interest and asset declaration for all levels of governance and employees who have legal obligation for them   |

The implementation of the foreseen measure is carried out through activities that continue throughout the year with measurable values, specifically such as continuous monitoring of the submission of asset and private interest declarations for all declaring subjects through the EACIDS system administered by HIDAACI, increasing the role of internal audit in institutions and increased capacities of staff and knowledge on corruption and its mechanisms, the establishment and implementation of mechanisms such as gift registers, on a semi-annual and annual basis.

*During January–December 2025*, HIDAACI has continued regularly the coordination process and support with the necessary institutional resources, the full functionality of the Electronic Asset and Private Interest Declaration System (EACIDS). HIDAACI has carried out on time and as planned the maintenance of the electronic EACIDS system, an activity made possible with the institution’s budget, respectively 19,207,642 ALL (annual cost).

For 2025, 4,554 subjects had the obligation to declare and of these it results that only 34 subjects did not fulfill this obligation within the legal deadlines. Therefore, from these data it results that 99.3% of declaring subjects have fulfilled the obligation to declare on time. Regarding the subjects controlled during this period, January–December 2025, in fulfillment of the control scheme foreseen in article 25/1 of Law no. 9049/2003, as amended, it results that 655 subjects should undergo full control, for whom the respective full control orders have been issued. Therefore, control orders have been issued for 100% of the subjects, in accordance with the scheme foreseen by law .

Regarding the document “Methodology of Verification and Control of Asset Declarations”, the revision process has started, together with technical assistance from the EU4GG project, during May–June 2025 to align the progress of work. The process has continued until the last months of 2025.

Regarding the drafting of a register model for the establishment of registers of gifts and favours given to public employees and officials, according to the requirements of the legislation in force, the General Directorate of Anti-Corruption has drafted a register model and it remains to be

distributed to institutions for implementation by public authorities. This process remains to be finalized with the continuation of the adoption of the new law on the prevention of conflict of interest .

Regarding the Continuous Professional Training Program for internal auditors in the public sector, approved by the order of the Minister of Finance no. 17608, dated 24.12.2024 “On the approval of the Continuous Professional Training Program of internal auditors in the public sector for the year 2025”, training has been provided for 21 internal auditors of central institutions and line ministries, continuous professional training of internal auditors, carried out on 26–30 May 2025 .

Regarding the organization and delivery of trainings on topics related to corruption prevention, the Albanian School of Public Administration, in cooperation with the Department of Public Administration and together with the civil society organization IDM, and with the support of SIDA, within the framework of the project “Strengthening Public Integrity through Improving Public Services”, developed the curriculum “Code of Ethics Manual for Public Administration Employees”, approved by the Director General of DPoA, by Order No. 70, dated 21.01.2025. In continuation of this cooperation, ASPA conducted 5 classroom trainings for human resources units of ministries and subordinate institutions, aimed at strengthening knowledge and skills on ethics and integrity in public administration, emphasizing the practical implementation of ethical rules in daily work, with the participation, and certification, of 53 persons. ASPA also conducted 8 online certified courses for employees of central government, local government, and independent institutions with 276 participants.

During 2025, 325 participants, employees of central government, local government, and independent institutions, took part in sessions on the topic “Declaration of assets, types and deadlines of asset declaration”, and another 266 participants took part in the session on “How to deal in practice with cases of conflict of interest?”.

As stated above, the measures and activities foreseen for 2025 and based on the analysis of the received data, it results that HIDAACI has collected and administered data for 4,554 declaring subjects. It results that only 34 subjects did not fulfill this obligation within the deadlines set by law. Therefore, from these data it results that the obligation for submission of declarations has been fulfilled by 99.3% of declaring subjects on time. Regarding the subjects controlled during 2025, in fulfillment of the control scheme foreseen in Article 25/1 of Law No. 9049/2003, as amended, it results that 655 subjects were planned for full control, for whom the respective full control orders have been issued. Therefore, control orders have been issued for 100% of the subjects, in accordance with the scheme foreseen by law. Referring to the target value for this performance indicator, it results that it has been achieved at 100%

Presentation of the achievement of the indicator according to the Indicator Passport is as follows :

|                        |      |   |
|------------------------|------|---|
| <b>Baseline Values</b> | 2023 |   |
|                        | N/A  |   |
|                        | 2024 | Preparation of the assessment   |
|                        | 2025 | Due to the nature of the indicator, the implementation time of the activity cannot be interrupted and the |

|                     |                                    |  |
|---------------------|------------------------------------|--|
|                     |                                    | assessment will be carried out according to the time of submission and control in accordance with legal obligations.   |
|                     | 2026                               | The value of the indicators is set at a constant 100% of declarations submitted and audited according to legal obligations for submission and audit.   |
|                     | 2027                               | Due to the nature of the indicator, the implementation time of the activity cannot be interrupted and the assessment will be carried out according to the time of submission and control in accordance with legal obligations. |
|                     | 2028                               | The value of the indicators is set at a constant 100% of declarations submitted and audited according to legal obligations for submission and audit..  |
|                     | 2029                               | Due to the nature of the indicator, the implementation time of the activity cannot be interrupted and the assessment will be carried out according to the time of submission and control in accordance with legal obligations. |
|                     | 2030                               | The value of the indicators is set at a constant 100% of declarations submitted and audited according to legal obligations for submission and audit.   |
| <b>Target Value</b> | <b>Year 2025 (targeted target)</b> | <b>Assessment of submitted declarations</b>  |
|                     | <b>Year 2025 (achieved target)</b> | <b>100%</b>  |

*1.2.3: Percentage of public institutions (central, local) that have drafted Integrity Plans.*

The target value for *performance indicator 1.2.3* for the year 2025 is: At least 80% of the foreseen public institutions have approved Integrity Plans (cumulative).

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, the following activities (8) and measures (3) are foreseen as follows.

|         |   |
|---------|---|
| 1.2.3   | Strengthening the integrity of public institutions at all levels of governance  |
| 1.2.3.1 | Detailed assessment of the number of institutions that have prepared corruption risk assessments and have approved Integrity Plans, at all levels of governance   |
| 1.2.3.2 | Preparation of amendments to the Ministerial Code of Ethics, to complete the rules for the ethical and integrity framework, lobbying and its organization   |
| 1.2.4   | Improving cooperation between PSA and Military Police, Tax Directorate and other police structures with a focus on the number of sanctions (measures) given to officials of law enforcement agencies for abuse of office and corruption |
| 1.2.4.1 | Joint trainings (annual) with participants from PSA, State Police, Military Police, Customs Directorate, Tax Directorate and other police structures on integrity and information in the fight against corruption                       |

|         |  |
|---------|--|
| 1.2.5   | Drafting of a harmonized framework in coherence with the legal and institutional framework in the fight against corruption and integrity of public officials and political functionaries (reflecting GRECO Round V recommendation “iii” for Albania) |
| 1.2.5.1 | Rulebook for conflict of interest, ethics and prevention of corruption for all public administration officials, in line with the requirements of GRECO recommendation iii), approved and disseminated  |
| 1.2.5.2 | Establishment of post-employment rules for political functionaries (preparation for amendment of rules)  |
| 1.2.5.6 | Carrying out an analysis of the legal framework on donations and sponsorships in the State Police (assessment report)  |
| 1.2.5.7 | Preparation of legal amendments on donations and sponsorships and consolidation of a legal framework   |
| 1.2.5.8 | Establishment of Confidential Councils in the State Police to provide confidential counselling for police officers on ethics, integrity, corruption, conflict of interest, confidentiality and other related issues.                                 |

The implementation of the envisaged measure is carried out through activities that continue throughout the entire year with measurable values and specifically such as the continuous monitoring of information for the assessment of corruption risk and the approval of Integrity Plans, at all levels of governance, following the legal framework on conflict of interest, the preparation of manuals for implementation, and the engagement of authorities such as PSA, customs and taxes on integrity issues through trainings and increased capacities.

During *January – December 2025*, a document (analysis) of corruption risk assessment has been carried out and to see the situation with Integrity Plans in public authorities. The General Directorate of Anti-Corruption has drafted this analysis from which it results that in all ministries there are integrity plans. Those ministries that were affected by the change of the field of responsibility after the composition of the new governmental cabinet in September 2025<sup>38</sup>, have been requested to review them. At the level of subordinate institutions and central agencies, out of 177 institutions in total, 78 institutions have approved and published Integrity Plans after the completion of the risk assessment, 10 institutions are in the process of drafting or updating Integrity Plans, 81 institutions do not yet have approved Integrity Plans. At the level of local governance, 44 municipalities have approved and published Integrity Plans, 2 municipalities are in the process of drafting or updating Integrity Plans, 15 municipalities do not have approved Integrity Plans.

Also in 2025, the integrity risk assessment was carried out and the new integrity plan<sup>39</sup> of the Ministry of Interior was drafted, through order no.114, dated 18.07.2025, for the period 2025 - 2028.

All subordinate bodies (agencies and directorates) under the Ministry of Agriculture and Rural Development have approved carried out integrity risk assessment and have approved Integrity Plans. These institutions are: Institute of Food Safety and Veterinary, 2025-2027, Directorate of Fisheries and Aquaculture Services, 2024-2027, National Agency of Tobacco Cigarettes, 2025-

<sup>38</sup> Education, economy, tourism, culture.

<sup>39</sup> <https://mb.gov.al/wp-content/uploads/2025/07/Plani-i-Integritetit-i-MB-2025-2028.pdf>

2027, State Entity of Seeds and Seedlings, 2025-2027, Agricultural Technology Transfer Center Fushë-Krujë, 2025-2027, Agricultural Technology Transfer Center Lushnje, 2025-2027, Agricultural Technology Transfer Center Korçë, 2025-2027, Agricultural Technology Transfer Center Vlorë, 2025-2027, Agricultural Technology Transfer Center Shkodër, 2025-2027, Agency for Agricultural and Rural Development, 2025-2028, Directorate of Irrigation and Drainage, Durrës, 2025-2027, Directorate of Irrigation and Drainage, Lezhë, 2025-2027, Directorate of Irrigation and Drainage, Fier, 2025-2027, Directorate of Irrigation and Drainage, Korçë, 2025-2027, Regional Agency of Agricultural Extension, Tirana, 2025-2027, Regional Agency of Agricultural Extension, Lushnje, 2025-2027, Regional Agency of Agricultural Extension, Korçë, 2025-2027, Regional Agency of Agricultural Extension, Shkodër, 2025-2027, National Authority of Veterinary and Plant Protection, 2025-2027, Regional Directorate of Veterinary and Plant Protection, Tirana, 2025-2027, Regional Directorate of Veterinary and Plant Protection, Elbasan, 2025-2027, Regional Directorate of Veterinary and Plant Protection, Vlorë, 2025-2027, Regional Directorate of Veterinary and Plant Protection, Shkodër, 2025-2027 and National Food Authority, 2025-2027. Also, among the subordinate bodies of the Ministry of Economy, Culture and Innovation, such as: General Directorate of Metrology, General Directorate of Standardization, General Directorate of Accreditation, State Inspectorate of Market Surveillance, Albanian Investment Development Agency, National Agency for Employment and Skills and the State Inspectorate of Labour and Social Services have also approved integrity plans. Among the subordinate bodies of the Ministry of Justice, the process of integrity reassessment has started for the drafting of the Integrity Plan in the Agency for the Treatment of Property. By order of the director of the Agency, no. 59, dated 24.2.2025, the institutional working group is carrying out the process and is in waiting for its approval in September 2025.

Referring to the changes in the Ministerial Code of Ethics, they continue to remain in the process of approval, as the intervention in them is expected to be addressed after the legal acts in the field of conflict of interest and lobbying are fully approved.

In the year 2025, the customs administration has benefited from joint trainings for female employees of law enforcement institutions in implementation of the “*We Women*” Program, supported by the Embassy of the United Kingdom. The training topics have aimed at sharing experiences on conflict management during the exercise of duty<sup>40</sup>, response to sexual harassment, etc, beneficiaries have been staff at the customs administration in Tirana, Vlorë and Shkodër. Within the framework of the implementation of measures for strengthening internal institutional capacities, the Agency for Police Supervision has undertaken during the year 2025 continuous basic and advanced training activities for a total of 72 new and existing employees. These activities have been carried out in cooperation with national and international partners, including ICITAP Albania, EU4LEA, the Security Academy, OSCE, ILEA, FBI/USA, as well as partner institutions from Bulgaria and Kosovo, with the aim of increasing professional capacities in the field of prevention and fight against corruption. The staff of PSA has participated in specialized trainings directly related to the assessment of corruption risk and the investigation of this criminal offense. Specifically, two employees of the Agency have participated in the training held on 4–5 December 2025 in Tirana, organized by the General Directorate of Anti-Corruption, with a focus on the assessment of corruption risk and the assessment of corruption opportunities in legislation, in

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<sup>40</sup> In relation to the offense of abuse of office

which representatives of other institutions with competencies in this field have also been involved. Also, 4 employees of the Agency have participated in a one-day training held in November 2025 at the Security Academy, with the topic of investigation and combating corruption, becoming familiar with the forms and methods used by the State Police in handling this criminal activity.

The General Directorate of the State Police, through the structures of the Directorate for the Investigation of Economic and Financial Crimes, has continued the implementation of a sustainable approach for strengthening professional capacities through trainings and specialized seminars. The responsible structures have participated in 32 trainings, from which 458 police officers have benefited. Compared to the same period of the year 2024, the dynamics of trainings during the year 2025 show a significant increase, specifically 25 more trainings have been conducted and 398 more police officers have benefited, reflecting an increased institutional commitment to improving the quality of investigation, analysis and prevention of economic and financial crimes, as well as strengthening the economic integrity of the country.

Simultaneously, the Ministry of Finance, in cooperation with the Financial Intelligence Agency, has conducted during the year 2025 a specialized training on the topic “*Prevention of Money Laundering*”. The training has been focused on concrete aspects of financial risk, including the concealment of income, the creation of fraudulent VAT schemes, lending between companies and partners, as well as the transfer and alienation of capital. The activity has been delivered by trainers of the Financial Intelligence Agency and has been held on 6.10.2025, with the participation of 40 participants, contributing to the increase of practical knowledge and the strengthening of institutional capacities in the field of prevention of money laundering.

Regarding post-employment rules for political officials, there have been no new developments and they remain still in process, envisaged to be included in Law no. 9131 dated 8.9.2003 “*On the rules of ethics in public administration*”

An analytical document on the legal framework for donations, for the public sector, has already been prepared and made available for the drafting of the legal framework for donations and sponsorships, which remains in the process of drafting and consultation.

The establishment and operationalization of Confidential Councils in the State Police: the Minister of Interior, through Order no. 26, dated 06.02.2025, has approved the regulation on the organization, functioning and composition of the Confidential Councils in the State Police, creating the legal basis for providing confidential counseling to police officers on issues related to ethics, integrity, corruption, conflict of interest, confidentiality and disciplinary procedures. In implementation of this order and in accordance with Law no. 82/2024 “On the State Police”, the Code of Ethics and Conduct, the legislation on ethics in public administration and GRECO recommendations, the General Directorate of the State Police has approved Order no. 272, dated 13.02.2025, for the establishment and functioning of the Confidential Councils, as well as the Standard Operating Procedure, approved by Order no. 293, dated 18.02.2025. The Confidential Councils have been established within the structure responsible for human resources in the General Directorate of the State Police, as well as within special structures, the Security Academy and the local directorates of the State Police. The members of these councils are appointed each calendar

year by order of the respective heads, according to the provisions of the regulatory framework in force.

In the year 2025, a draft manual (rulebook) for conflict of interest, ethics and prevention of corruption for all public administration officials has not yet been prepared, as the approval of the law on the prevention of conflict of interest in the exercise of public functions is expected.

Based on the above, the measures and activities foreseen for the year 2025, directly related to performance indicator 1.2.3, it is assessed that during the year there has been an increasing trend in the drafting of integrity plans in public institutions. There are 122 institutions, at central and local level, that have integrity plans in implementation during this period. Of these, 78 are authorities at central level (central authorities and their subordinate bodies) and 44 are authorities at local level (municipalities). In reference to the target value for this performance indicator, it is concluded that it has been achieved at 100%

The presentation of the achievement of the indicator according to the Indicator Passport is as follows:

|                              |                                    |   |
|------------------------------|------------------------------------|---|
| <b>Baseline Values</b>       | 2023                               |   |
|                              | N/A                                |   |
|                              | 2024                               | 11 ministries, 23 municipalities  |
|                              | 2025                               | At least 80% of the foreseen public institutions have approved Integrity Plans (cumulative) |
|                              | 2026                               | At least 85% of the foreseen public institutions have approved Integrity Plans (cumulative) |
|                              | 2027                               | At least 90% of the foreseen public institutions have approved Integrity Plans (cumulative) |
|                              | 2028                               | At least 95% of the foreseen public institutions have approved Integrity Plans (cumulative) |
|                              | 2029                               | All public institutions have approved Integrity Plans (cumulative)                          |
|                              | 2030                               | All public institutions have approved Integrity Plans (cumulative)                          |
| <b>Target Value / Target</b> | <b>Year 2025 (target)</b>          | At least 80% of the foreseen public institutions have approved Integrity Plans (cumulative) |
|                              | <b>Year 2025 (achieved target)</b> | <b>100%</b>   |

### **Level of achievement of Objective 1.2.**

The level of achievement of *Objective 1.2, Strengthening transparency, accountability and integrity of public institutions at all levels of governance*, in relation to the achievement of the performance indicators for the year 2025, is **100%**.

The calculation has been carried out by measuring and evidencing the data and information included in this report, in accordance with the provisions set out in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The calculation has been performed according to the following formula:

$$NR\ 1.2 = \frac{TP\ 1.2.1\ (100\%)+\ TP\ 1.2.2\ (100\%)+TP\ 1.2.3\ (100\%)}{3\ TP} \times 100\% = 100\%$$

### Data verifiability

The reported data on the performance indicators are based on information reported by CRIPCI, HIDAACI, and on the assessment analysis carried out by the General Directorate of Anti-Corruption, for the monitoring of the implementation of the action plan for the year 2025.

### Risks for the achievement of Objective 1.2

For the year 2025, no frequent risks have been identified in the achievement of the specific objective. The implementation progress of the measures, specifically related to strengthening transparency, asset control, and integrity instruments at all levels of governance, may present a low risk if the administration of these institutions reduces control mechanisms.

### 1.3 Development of a sustainable approach for the prevention of corruption in high-risk sectors (high prevalence of corruption).

For this objective, 2 performance indicators have been defined:

1.3.1: Ratio of the number of corruption risk assessments carried out to the number of high-risk sectors/institutions for corruption (increasing trend).

1.3.2: Ratio of the number of Action Plans drafted for the prevention of corruption to the number of high-risk sectors/institutions for corruption (increasing trend).

The Action Plan for Objective 1.3, for the period January–December 2025, foresees 24 activities and 5 measures.

The target value for *performance indicators* 1.3.1 and 1.3.2 for the year 2025 is: 40% of high-risk institutions/prevalence of corruption have carried out corruption risk assessments for 1.3.1 and 40% of high-risk institutions/prevalence of corruption have prepared Action Plans for 1.3.2.

To achieve the indicator values in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, activities (14) and measures (5) have been foreseen, as follows..

The analysis and assessment of these for this monitoring report will be carried out cumulatively due to the organic and relevant link that the implementation of the activities has, respectively.

|         |  |
|---------|--|
| 1.3.1   | Prevention of corruption in the public sector  |
| 1.3.1.1 | Revision of the methodology of Corruption Risk Assessment in the Public Sector   |
| 1.3.1.2 | Organization of trainings with anti-corruption coordinators and GDoA staff for the implementation of the Corruption Risk Assessment Methodology in the Public Sector   |
| 1.3.2   | Prevention of corruption in the management of the property sector  |
| 1.3.2.1 | Development of the methodology for the assessment of corruption risks on the basis of functions/activities in the field of property, as a section of the Corruption Risk Assessment Methodology in the Public Sector |

|         |  |
|---------|--|
| 1.3.2.2 | Property sector risk register, published and made available to the public (annual)   |
| 1.3.2.3 | In-depth assessment of corruption risk in the field of property (risk factors)   |
| 1.3.2.4 | Integrity risk assessment and Integrity Plan of SCA, approved and published  |
| 1.3.2.5 | Approval of an Action Plan for the prevention of corruption in the property sector, after the completion of the corruption risk assessment, as an integral part of the ISAC Action Plan  |
| 1.3.2.6 | Development of training programs dedicated to cadastral staff  |
| 1.3.3   | Prevention of corruption in the health system and social care  |
| 1.3.3.1 | Development of the methodology for the assessment of corruption risks on the basis of functions/activities in the field of health and social protection, as a section of the Corruption Risk Assessment Methodology in the Public Sector |
| 1.3.4   | Prevention of corruption in the field of education   |
| 1.3.4.1 | Development of the methodology for the assessment of corruption risk for the functioning of the education system, as a section of the Corruption Risk Assessment Methodology in the Public Sector  |
| 1.3.4.4 | Assessment of the educational curriculum for the revision of the program for the inclusion of anti-corruption topics   |
| 1.3.5   | Prevention of corruption in the field of public procurement  |
| 1.3.5.2 | Assessment of corruption risk for the field of public procurement (risk factors)   |
| 1.3.5.3 | Development and approval of an Action Plan for the prevention of corruption in the public procurement sector, as part of the ISAC Action Plan  |
| 1.3.5.4 | Inclusion in the training curriculum of a module on integrity in public procurement as well as the development of training programs for public administration addressing integrity issues in public procurement                          |

The implementation of the planned measures is carried out through activities that continue throughout the entire year with measurable values, specifically such as carrying out corruption risk assessments for vulnerable sectors and taking measures for them, on a 6-month and annual basis.

*During January – December 2025*, the document Methodology for Corruption Risk Assessment in the public sector (Methodology) was approved with Order No. 2, dated 22.04.2025, of the Minister of State for Public Administration and Anti-Corruption<sup>41</sup>. The Methodology is the first document in the country that provides a detailed overview of the process for corruption risk assessment, structuring it into several phases and explaining each of them in detail. The Methodology is expected to provide a presentation of different types of corruption risk factors, as well as the definition of several important terms related to this field. The Methodology addresses ethical dilemmas for public sectors at risk of corruption and comes as a combination of integrity risk assessment and corruption risk assessment. Vulnerable sectors and those at risk of corruption such as property, health and social care, education, public procurement and concessions, taxes and customs, which have a major impact on governance and public trust in institutions, will be subject to sectoral corruption risk assessment based on data and the process foreseen by this Methodology.

<sup>41</sup> <https://antikorrupsioni.gov.al/kreu/lista-dokumenteve/>.

The document has been prepared in close cooperation with the technical assistance of the EU4GG project and the organization ALTRI.

With the approval of the Methodology, training sessions and knowledge transfer for its implementation have been conducted for technical staff of institutions in the field, at central and local level as well. For this purpose, a group of trainers (ToT) has been established at the General Directorate of Anti-Corruption consisting of 12 persons, who were initially trained and received detailed information from the technical assistance involved in drafting the Methodology. With the approval of the Methodology, training sessions and knowledge transfer for its implementation have been conducted for technical staff of institutions in the field, at central and local level as well. For this purpose, a group of trainers (ToT) has been established at the General Directorate of Anti-Corruption consisting of 12 persons, who were initially trained and received detailed information from the technical assistance involved in drafting the Methodology. On 28.04.2025, the ToT training was conducted, which will further facilitate the corruption risk assessment at institutional level. Subsequently, on 06.05.2025, a training session for Anti-Corruption Coordinators (21 persons) was held, where practices of corruption risk assessment were presented and shared among them. The training was delivered by two trainers of the General Directorate of Anti-Corruption, together with technical support experts. The second training was organized on 20.05.2025 with the participation of 36 persons, staff from line ministries, responsible authorities with fields of activity in high-risk sectors (property, taxes, customs and public procurement), their subordinate bodies and independent institutions. The training was delivered by three other trainers of the General Directorate of Anti-Corruption, together with technical support experts. On 13.06.2025, a training session was held for staff from 28 municipalities, selected among municipalities <sup>42</sup> that have integrity plans in implementation. This training was also delivered by five other trainers of the General Directorate of Anti-Corruption, supported by technical assistance experts.

In 2025, the process of preparing the sectoral methodology for corruption risk in the field of property has started, based on a structured and inter-institutionally coordinated process, in function of strengthening the standards of transparency, accountability and prevention of corruption. MSPAA has coordinated the phases of the process, which will also have the technical support of the EU4GG project of the EU Delegation in Tirana. With the consolidation of this document, it is expected to also start the corruption risk assessment (activity 1.3.2.3) and consequently also the sectoral action plan (activity 1.3.2.5).

With Instruction no.16, dated 31.12.2024, “On responsibilities and duties related to the coordination of financial management and control and the functioning of the management group”, as well as based on Order no. 834, dated 15.07.2025 and Order no. 835, dated 15.07.2025, from the Director General of SCA, have been established: (1) the Working Group “On the establishment of the Risk Management Group of the State Cadastral Agency” (RMG) and (2) the Working Group “On the establishment of the Strategic Management Group of the State Cadastral Agency”. The internal directorates of SCA are expected to carry out the identification and analysis of risks that may affect the achievement of the defined objectives based on an in-depth analysis of internal and

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<sup>42</sup> Belsh, Berat, Bulqizë, Durrës, Has, Himarë, Kavajë, Kukës, Lezhë, Maliq, Përmet, Pogradec, Pukë, Roskovec, Shijak, Librazhd, Lushnjë, Shkodër, Prenjas, Libohovë, Vlorë, Kavajë, Fushë-Arrëz, Elbasan, Mallakastër, Tiranë, Patos dhe Mat.

external factors that may constitute threats or uncertainties for the effective functioning of the respective directorates. Each directorate will draft concrete measures for the prevention, minimization or management of the identified risks (property risk register). These measures will include: definition of responsibilities for implementation, timeframes, necessary resources and follow-up mechanisms.

The State Cadastral Agency has approved the Integrity Plan with Order no.1219, dated 25.11.2025, of the Director General of SCA. In close cooperation with the General Directorate of Anti-Corruption, during March–November 2025, the integrity risk assessment and the Integrity Plan were carried out. The Integrity Plan 2025–2027<sup>43</sup> of the State Cadastral Agency was carried out through an open process of coordination and consultation with the participation of SCA management staff and specialists, as well as stakeholders, including notaries, bailiffs, engineers, surveyors and lawyers of the State Advocacy. These discussions contributed to the identification of the main integrity risks and to the determination of preventive measures against exposure to corruption, through the approval of internal regulatory acts, working documents (manuals), strengthening of technical-professional capacities of technical directorates and improvement of the internal control system. The Integrity Plan 2025–2027 addresses clear objectives, including strengthening internal control, increasing institutional accountability and improving the culture of integrity in decision-making, increasing institutional transparency, as well as increasing the trust of citizens and businesses in public services provided by the cadastre.

This interaction is considered essential to ensure that the Integrity Plan does not remain merely a formal document, but is transformed into a functional instrument for strengthening transparency, accountability and institutional responsibility within SCA.

In 2025, with reference to the training programmes for employees of the State Cadastral Agency, the Albanian School of Public Administration has carried out the assessment of internal and external training needs. With Order no. 1858, dated 31.12.2025, of the Director General of SCA, the Annual Training Programme and Calendar for 2026 has been approved, which foresees the development of dedicated trainings throughout the year for employees of the central directorates and local offices of SCA. At the same time, SCA continues cooperation with ASPA, which provides informative materials and training programmes for the professional development of public administration employees. In this framework, the Performance Sector selects and distributes the relevant materials to the responsible structures, ensuring timely information for staff and equal access to training opportunities. This mechanism contributes to ensuring a unified and sustainable approach to the professional development of SCA employees.

In 2025, the process of preparing the sectoral methodology for corruption risk in the field of health and social care has started, based on a structured and inter-institutionally coordinated process, in function of strengthening the standards of transparency, accountability and prevention of corruption. MSPAA has coordinated the phases of the process, which will also have the technical

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<sup>43</sup> <https://www.ashk.gov.al/wpcontent/uploads/2025/09/Draft-Plani-i-Integritetit-te-Agjencise-Shteterore-te-Kadastres.pdf>

support of the Basel Institute on Governance, in Switzerland. This process will also be assisted by the Swiss Development Agency project in cooperation with the Council of Europe office in Tirana.

In 2025, negotiations have started for technical support findings for the preparation of the sectoral methodology for corruption risk in the field of education, based on a structured and inter-institutionally coordinated process, in function of strengthening the standards of transparency, accountability and prevention of corruption. This process remains to be developed in 2026. Meanwhile, in 2025, the Ministry of Education has completed the drafting of the content of the curriculum of the subject “Citizenship”, through the analysis of content lines and concrete topics according to educational levels from grade I–IX, with a special focus on the inclusion of anti-corruption topics. The approval of the teaching programmes that include these topics was carried out in October 2025, while their implementation, together with the approval of new textbooks based on these programmes, is planned to start in the school year 2026–2027. Changes in the curriculum teaching programmes have been approved through Order no. 555, dated 28.10.2025, of the Minister of Education and Sports “On the approval of the teaching programmes of several subjects of the core curriculum of some classes of basic education” and Order no. 556, dated 28.10.2025, of the Minister of Education and Sports “On the approval of the teaching programmes of several subjects of the core curriculum and elective curriculum of upper secondary education”. These interventions constitute an important step in the systematic integration of anti-corruption education in the school curriculum and in strengthening the culture of integrity from pre-university education.

In 2025, the Public Procurement Agency, with the support of experts provided by OSCE, has finalized and published the document “Methodology for risk in public procurement”<sup>44</sup>, which clearly defines corruption risk factors and the way of measuring them at different levels. The Methodology guides public institutions in identifying areas prone to corruption and in implementing specific preventive measures, reflecting both the national legal framework and international best practices. The document provides for two levels of risk assessment: (i) the macro level approach, where PPA carries out risk assessment for all contracting authorities and procurement procedures; and (ii) the micro level approach, where the assessment is carried out for specific sectors, authorities or procedures. During the year 2026, the continuation of the process of collecting and analyzing information on risk factors is foreseen, taking into consideration that corruption risks may appear at different stages of the public procurement process (activity 1.3.5.2).

Meanwhile, in 2025, PPA has continued cooperation with ASPA for the development and organization of trainings where one of the dedicated topics is also the integrity of public administration in the field of public procurement and the treatment of principles such as: the principle of conflict of interest, ethics and respect of public procurement principles. This cooperation aims at the institutionalization of the inclusion of integrity and ethics as a mandatory part of the professional training of contracting authorities, in accordance with Article 18 of the Public Procurement Law. In this framework, ASPA has conducted informative sessions and certified trainings in the field of “Public Procurement”, where as an integral part of the curriculum the topics of conflict of interest and integrity have also been addressed. In these trainings, 493 employees from central government, local government and independent institutions have participated.

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<sup>44</sup> <https://www.app.gov.al/legjislacioni/prokurimi-publik/udherrefyes/>

As above, the measures and activities foreseen for the year 2025 have directly influenced the target value of performance indicators 1.3.1 and 1.3.2. In conclusion, with the approval of the document Methodology for Corruption Risk Assessment in the public sector, the preparation of sectoral corruption risk assessment methodologies has also started. As a result, the Sectoral Methodology for Corruption Risk Assessment in the field of public procurement has been carried out, consolidated and approved. Meanwhile, the process of mapping risk factors has been carried out in order to prepare the methodology for risk assessment in the property sector. Also during 2025, technical cooperation has been coordinated for the drafting of the methodology for sectoral assessment in the health and social care sector. In reference to the preparation of these assessment documents (methodologies), the risk assessment in the public procurement sector and in the property sector has started, and also to open the way for the measurement of the second indicator, such as the drafting of action plans. In conclusion, regarding the measurement of performance indicators 1.3.1 and 1.3.2 during the year 2025, it results that performance indicator 1.3.1 remains at the value of 50% achievement, based only on the two fields for which it has started (property and public procurement). Performance indicator 1.3.2 remains dependent on the completion of indicator 1.3.1, therefore it remains not achieved.

The presentation of the achievement of indicators 1.3.1 and 1.3.2, according to the Indicator Passport, is as follows:

|                        |                     |  |
|------------------------|---------------------|--|
| <b>Baseline Values</b> | 2023                |  |
|                        | N/A                 |  |
|                        | 2024                | Preparation of the assessment (assessment methodology)   |
|                        | 2025                | 40% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments  |
|                        | 2026                | 70% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments  |
|                        | 2027                | 100% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments |
|                        | 2028                | 100% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments |
|                        | 2029                | 100% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments |
|                        | 2030                | 100% of high-risk/high-corruption-prevalence institutions have carried out corruption risk assessments |
|                        | <b>Target value</b> | <b>Year 2025 (target)</b>  |

|  |  |                             |
|--|--|-----------------------------|
|  | Target value – Year 2025 (achieved target) | 1.3.1 is 50%<br>1.3.2 is 0% |
|--|--|-----------------------------|

### Level of achievement of Objective 1.3.

The level of achievement of *Objective 1.3: Development of a sustainable approach for the prevention of corruption in high-risk sectors (high prevalence of corruption)*, in relation to the achievement of the performance indicators for the period January – December 2025 is **25%**.

The calculation is not possible to be measured and to evidence the data and information included in this report, in accordance with the provisions made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

Calculation has been carried out according to the following formula:

$$NR\ 1.3 = \frac{TP\ 1.3.1\ (50\%) + TP\ 1.3.2\ (0\%)}{2\ TP} \times 100\% = 25\%$$

### Data verifiability

The reported data on performance indicators are based on the information administered by the General Directorate of Anti-Corruption, for the monitoring of the implementation of the action plan for January - December 2025.

### Risks for the achievement of Objective 1.3

For the year 2025, the achievement of the objective has been put at risk as a result of the finalization and approval in order to start the implementation of the assessment methodologies and with the aim of drafting action plans for interventions in the property and public procurement sectors.

### 1.4 *Strengthening mechanisms for the prevention of corruption in local self-government units.*

For this objective, 2 performance indicators have been defined:

*1.4.1: Ratio of the number of municipalities and counties that have carried out integrity risk assessments to the number of those that have not yet done so (increasing trend).*

*1.4.2: Ratio of the number of municipalities and counties that have prepared Integrity Plans to the number of those that have not yet prepared them (increasing trend).*

The action plan for Objective 1.4, for the period January–December 2025, foresees 11 activities and 3 measures.

The target values for *performance indicators 1.4.1 and 1.4.2* for the year 2025 are: 40% of municipalities and counties have carried out the integrity risk assessment for 1.4.1 and 40% of municipalities and counties have prepared (approved) Integrity Plans for 1.4.2.

To achieve the indicator values in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, (11) activities and (3) measures have been foreseen, as follows. Their analysis and assessment for this monitoring report will be carried out cumulatively due to the organic and relevant link between the implementation of the activities.

|         |  |
|---------|--|
| 1.4.1   | Identification of ways to improve the prevention of corruption in local self-government units  |
| 1.4.1.1 | Assessment of the implementation of instruments for the prevention of corruption in local government units and districts administrations (assessment report)                             |
| 1.4.1.2 | Assessment report for the identification of local self-government units that do not yet have integrity plans   |
| 1.4.1.3 | Preparation of the Methodology for Corruption Risk Assessment and a model Integrity Plan for districts and municipalities.   |
| 1.4.2   | Strengthening mechanisms for the effective prevention of corruption in local self-government units   |
| 1.4.2.1 | Annual awareness roundtable on the engagement of local self-government units in the prevention of corruption in the exercise of public duties.   |
| 1.4.2.2 | Identification of counties and municipalities where integrity and anti-corruption focal points have not been appointed   |
| 1.4.2.3 | Appointment of integrity and anti-corruption focal points, and freedom of information coordinators in districts and municipalities where they do not exist                               |
| 1.4.2.4 | Cooperation agreement between GDoA and ASLG for coordination and alignment of work in the implementation of anti-corruption measures   |
| 1.4.3   | Implementation of preventive mechanisms adapted to the specifics of local self-government  |
| 1.4.3.1 | Assessment of training needs for the implementation of anti-corruption measures and preparation of training curricula  |
| 1.4.3.2 | Information activities focused on the prevention of anti-corruption mechanisms in districts and municipalities.  |
| 1.4.3.3 | Organization of trainings for the implementation of measures and preventive anti-corruption activities in districts and municipalities (periodic and continuous trainings).              |
| 1.4.3.4 | Improvement of access to information, active transparency and consultation with citizens of counties and municipalities (functional websites, citizen offices, information publications) |

The implementation of the foreseen measure is carried out through the activity that continues throughout the year with measurable values and specifically as it is mentioned the continuation of the drafting of integrity instruments (integrity plans), the development of discussion roundtables, access to information, active transparency and consultation with the citizens of districts and municipalities (functional websites, citizen offices, information publications).

*During January – December 2025*, the Agency for the Support of Local Self-Government has prepared information on the situation of the integrity risk assessment and of the drafting of integrity plans in municipalities and districts, and on the level of their implementation. 44 municipalities have Integrity Plans in implementation, among which: 35 municipalities have a valid plan up to within 2025, 5 municipalities have had their validity ended before 2025 and for 4 municipalities it

is expected that the Integrity Plan will be implemented after 2025. In the analytical report carried out it is evidenced that there remain 17 municipalities that do not have an approved Local Integrity Plan, they are mentioned: Cërrik, Devoll, Dimal, Fier, Këlcyrë, Korçë, Krujë, Kuçovë, Memaliaj, Mirditë, Pustec, Rrogozhinë, Selenicë, Shkodër, Skrapar, Tepelenë, Vau-Dejës<sup>45</sup>.

The process of drafting a document Methodology for Corruption Risk Assessment and model Integrity Plan has started, a working process that will be enabled in cooperation with the EU4GG project. MSPAA and GDoA have prepared a preliminary draft, which will be consolidated in accordance with international standards of a methodology document, in cooperation with municipalities for the identification of risk factors and measurement indicators.

Referring to the development of an annual national roundtable for the prevention of corruption in local self-government units, the infrastructure has been created and established and its organization has been coordinated. In July 2025, the roundtable “Assessment of Integrity Risk in the framework of the Performance-Based Grant and the Methodologies for the Assessment of Integrity and Corruption Risk” was held, in cooperation with the EU4GG project and with the participation of all representatives and staff of the 61 municipalities of the country. The topics of discussion were: the Performance-Based Grant; Assistance for municipalities, as well as the Methodology for the Assessment of Integrity Risk and the Methodology for the Assessment of Corruption Risk: approach, steps and necessary structures; the cycle of integrity risk management and the cycle of corruption risk management and practical exercises.

In all municipalities of the country and in the prefecture, anticorruption contact points have been appointed and are in regular communication. Integrity coordinators have been appointed only in those municipalities that have approved integrity plans (44 municipalities), and freedom of information coordinators have been appointed in all public authorities (municipalities and districts). The Commissioner approved Order no. 281/2025 “*On the approval of the Model Transparency Programme for Local Self-Government Units*” <https://idp.al/wp-content/uploads/2026/01/Urdher-nr.-281-miratimi-Programi-model-i-transparences-per-Njesite-e-Veteqeverisjes-Vendore.pdf> published in the Official Gazette no. 6, dated 08.01.2026. The Model Transparency Programme for local self-government units provides for the inclusion of a new field dedicated to the activity of Municipal Councils as one of the most important bodies of local self-government units, as well as the implementation of this model also by district councils, with the aim of strengthening transparency in the decision-making process at the local level.

In 2025, a cooperation agreement between ASLG-GDoA was not concluded, but institutional communication has increased and has facilitated the progress of implementation of measures. Two representatives of GDoA are also members of the Performance-Based Grant evaluation commission.

Regarding the assessment of training needs, it remains unimplemented (activity 1.4.3.1) as it remains conditioned by the drafting and approval of the Methodology for the Preparation and Monitoring of Integrity Plans. Also, trainings have not been conducted for municipal and prefecture staff (activity 1.4.3.3).

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<sup>45</sup> <https://qeverisjvendore.gov.al/decentralizimi/planet-e-integritetit/>.

Regarding information on communication, visibility and the right to information for municipalities and districts (prefectures), it appears that during this period of 2025, the quality of communication and information for citizens has increased and improved. In all municipalities and districts of the country, freedom of information coordinators have been appointed. 61 municipalities have active websites where data and information for citizens are published, as well as citizen communication offices. Meanwhile, regarding districts, they also have websites.

Based on the above, the measures and activities planned for 2025 have directly influenced the target value of performance indicators 1.4.1 and 1.4.2. In 2025, it appears that 44 local self-government units (municipalities) have carried out a full assessment of integrity risk and have drafted and are implementing integrity plans. Referring to the target value for this performance indicator, it is assessed as achieved at 100%

The presentation of the achievement of indicators 1.4.1 and 1.4.2, according to the Indicator Passport, is presented as follows:

|                        |      |   |
|------------------------|------|---|
| <b>Baseline values</b> | 2023 |   |
|                        | N/A  |   |
|                        | 2024 | 1.4.1 Preparation of the Assessment and prepared methodology<br>1.4.2 Preparation of the assessment   |
|                        | 2025 | 1.4.1 40% of municipalities and districts have carried out the integrity risk assessment<br><br>1.4.2 40% of municipalities and districts have prepared (approved) Integrity Plans        |
|                        | 2026 | 1.4.1 70% of municipalities and districts have carried out the integrity risk assessment<br><br>1.4.2 70% of municipalities and districts have prepared (approved) Integrity Plans        |
|                        | 2027 | 1.4.1 100% of municipalities and districts have carried out the integrity risk assessment<br><br>1.4.2 100 of municipalities and districts have prepared (approved) Integrity Plans       |
|                        | 2028 | 1.4.1 100% 100% of municipalities and districts have carried out the integrity risk assessment<br><br>1.4.2 100% of municipalities and districts have prepared (approved) Integrity Plans |
|                        | 2029 | 1.4.1 100% of municipalities and districts have carried out the integrity risk assessment<br>1.4.2 100% of municipalities and districts have prepared (approved) Integrity Plans          |
|                        | 2030 | 1.4.1 100% of municipalities and districts have carried out the integrity risk assessment   |

|              |                            |  |
|--------------|----------------------------|--|
|              |                            | 1.4.2 100% of municipalities and districts have prepared (approved) Integrity Plans  |
| Target value | Year 2025 (Target )        | 1.4.1 40% of municipalities and districts have carried out the integrity risk assessment<br>1.4.2 40% of municipalities and districts have prepared (approved) Integrity Plans |
|              | Year 2025 (Achieved value) | 100%   |

#### Level of achievement of Objective 1.4

The level of achievement of *Objective 1.4 Strengthening mechanisms for the prevention of corruption in local self-government units*, in relation to the achievement of performance indicators for the period January–December 2025, is **100%**.

The calculation has been carried out by measuring and evidencing the data and information included in this report, in accordance with the provisions set in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The calculation has been carried out using the following formula:

$$NR\ 1.4 = \frac{TP\ 1.4.1\ (100\%)+\ TP\ 1.4.2\ (100\%)}{2\ TP} \times 100\% = 100\%$$

#### Data verifiability

The reported data on performance indicators are based on information reported by CRIPCI and ASLG for monitoring the implementation of the action plan for the period January–December 2025, and based on direct reporting from the municipalities of the country (anticorruption contact points).

#### Risks for the achievement of Objective 1.4

For the year 2025, the achievement of the objective has resulted in a medium risk; there has been an increasing trend, but it should be taken into consideration that in the future the trend should progress further in order to achieve the annual target value of the indicator.

#### ***1.5 Protection of public finances and assets from misuse during the exercise of public functions.***

For this objective, 2 performance indicators are defined:

*1.5.1: Increase of audits in areas with public sensitivity to promote effective use of public funds, strengthening accountability and integrity of the administration.*

*1.5.2: Percentage of implemented recommendations by public institutions out of the total number of recommendations given (increasing trend).*

The action plan for Objective 1.5, for the period January–December 2025, foresees 9 activities and 3 measures.

The target values for *performance indicators 1.5.1 and 1.5.2* for 2025 are: a 5% increase in the number of internal and external audits conducted for 1.5.1, and 80% of internal and external audit recommendations implemented for 1.5.2.

To achieve the indicator values in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, 9 activities and 3 measures have been foreseen as follows. The analysis and assessment of these will be carried out in this monitoring report on a cumulative basis, due to the organic and relevant linkage between their implementation and execution of the activities, respectively.

|         |   |
|---------|---|
| 1.5.1   | Strengthening the role of inspections in corruption prevention  |
| 1.5.1.1 | Cooperation between GDoA and the General Inspectorate for the inclusion of the anticorruption aspect in the control activity of inspectorates in line ministries                                    |
| 1.5.1.2 | Manual for anticorruption controls and inspections in the work of inspectorates in line ministries, with a focus on issues related to communication, coordination and reporting of corruption cases |
| 1.5.2   | Strengthening the role of internal and external audits in corruption prevention   |
| 1.5.2.2 | Detailed review of the competencies of internal and external audit and identification of opportunities for further strengthening of their knowledge and preparedness on corruption issues           |
| 1.5.2.3 | Review of control procedures carried out by the High State Audit (HSA)  |
| 1.5.2.4 | Identification of the need for training of auditors (internal and external) to strengthen the anticorruption aspect in their work   |
| 1.5.2.5 | Organization of joint trainings to strengthen the anticorruption aspect in the work of internal and external auditors, communication, coordination and reporting methods                            |
| 1.5.3   | Strengthening the role of regulatory bodies in corruption prevention  |
| 1.5.3.1 | Identification of additional expertise and skills needed to strengthen corruption prevention in the work of the relevant regulatory bodies  |
| 1.5.3.2 | Manual for strengthening controls for corruption cases in the staff of regulatory bodies  |
| 1.5.3.3 | Identification of the need for training of regulatory bodies to strengthen the anticorruption aspect in their work  |

The implementation of the foreseen measure is carried out through activities that continue throughout the year with measurable values, specifically as mentioned: strengthening the role of internal and external audit, HSA controls, as well as regarding the expertise and additional skills required for corruption prevention within regulatory bodies.

*During the period January–December 2025, the High State Audit reports that during this period there has been no review of internal and external audit competencies, and no identification of opportunities for further strengthening their knowledge and preparedness on corruption issues. However, improvements in audit working documents supporting audit findings have been observed, in full compliance with international auditing standards, through the revision of the Audit Procedures Regulation and its accompanying acts, which are part of this regulation.*

Improvements in the quality of audits have been observed, continuously responding to developments in Professional Standards of External Public Audit and audit regulations, contributing to strengthening the accountability system, as well as supporting professional development and strengthening of public institutions, and orienting audit work in relation to the annual and medium-term budget programme, in function of the Sustainable Development Goals 2023 and the effective and efficient use of public funds.

The Ministry of Finance, with Ministerial Order no. 134, dated 17.10.2025, has approved the Internal Audit Manual in the public sector, where the competencies of internal audit and communication with external audit have been revised, in accordance with global standards.

The Ministry of Finance has prepared an assessment report identifying the needs for training internal auditors to strengthen the anticorruption aspect in their activities. These needs have been analyzed and are planned to be addressed during continuous training for the year 2026, based on the 2026 Program CPT, approved by the Minister of Finance, Order no. 165, dated 31.12.2025.

The High State Audit Institution reports that there have been no developments regarding the organization of joint trainings to strengthen the anticorruption aspect in the work of internal and external auditors, as well as communication, coordination and reporting methods. However, during 2025, HSA staff participated in 116 training topics, of which 29 were organized by ASPA and 5 by HSA & partners such as EUROSAI, IDI, CEF, homologous SAIs, etc. A total of 154 audit staff were trained, achieving an average of 24 training days per audit staff member for the 8-month period (compared to the target of 13–17 training days). During this period, around 24% of trainings were conducted in person, while 76% were online. On the other hand, ASPA organized one information session and one classroom certified training on the topic “Assessment, Control and Audit”, with 363 participants, and additionally trainings were delivered by internal HSA staff, financed by the institution’s budget.

The High State Audit Institution has continued its audit work in implementation of the plan approved by Decision no. 218, dated 15.11.2024, of the leader of HSA carrying out and finalizing 55 audit missions, in assessment of compliance and financial regularity, performance, IT, and follow-up of the implementation status of previous recommendations. The conducted audits covered the activity of 108 entities, including different levels of governance such as: 54 central government and subordinate institutions; 41 local self-government institutions and other local entities; 4 independent institutions; 5 public companies and foreign-funded projects; and 4 environmental protection institutions. A total of: 11 combined audits; 4 financial audits; 8 compliance audits; 8 IT audits; 17 audits on implementation of recommendations; 2 performance audits; and 5 thematic audits were carried out.

The High State Audit Institution has completed 55 audit missions, concluding with 64 audit opinions, messages and conclusions, including:

- 16 compliance audit opinions,
- 14 financial opinions,
- 2 performance audit messages,
- 32 conclusions, of which: 17 on implementation of recommendations, 2 in compliance audits, 5 in thematic audits, and 8 in IT audits.

Regarding the number of recommendations, for the year 2025, the High State Audit Institution issued 1,034 recommendations, of which: 114 measures did not meet the legal deadline of 20 days

and met the 20 day legal deadline for responding regarding the acceptance of recommendations, and 920 measures, of which: 919 were accepted (99%) and 1 measure was not accepted. In reviewing the implementation of recommendations, the High State Audit Institution has requested from all entities the implementation of unimplemented measures, and has encouraged the implementation of measures that were in process or partially implemented. For the 55 completed audits, recommendations included 4 proposals for legal changes or improvements in audited public institutions, aimed at improving the situation. A total of 148 recommendations were issued regarding findings with negative effects on the state budget, with a total value of 2,404,623 thousand ALL, of which: economic damage was estimated at 112,257 ALL, and inefficient management of funds amounted to 2,292,366 ALL.

HSA, based on Law no. 154, dated 27.11.2014 “On the Organization and Functioning of the High State Audit”, HSA, for the deficiencies and violations identified, has addressed to the audited entities 214 recommendations for administrative and disciplinary measures, of which 3 administrative measures and 211 disciplinary measures.

This report lacks information from the regulatory bodies (activities 1.5.3.1, 1.5.3.2 and 1.5.3.2). Also, the activities (1.5.1.1 and 1.5.1.2) from the General Inspectorate are found unimplemented, due to legal changes and restructuring of state inspectorates.

The above said, the measures and activities foreseen for the year 2025 provide some primary data for measuring the target value of performance indicators 1.5.1 and 1.5.2, but as it results from the information received from the MoF, specifically as follows:

- Regarding indicator 1.5.1: the data on the number of *audits in public-sensitive areas to promote the effective use of public funds, strengthening accountability and integrity of the administration*, for the year 2025 will be reported in May 2026, the period when it is defined in legal acts the finalization of the “Annual Report for internal audit in the public sector for the year 2025”.
- Regarding indicator 1.5.2: the same as above, in relevance with the preparation of the “Annual Report for internal audit in the public sector for the year 2025”.

HSA, has carried out 55 audit missions in different institutional activity areas (as cited above) and from 1034 recommendations, 919 (99%) have been accepted.

The above said, in the impossibility of having data from both responsible institutions for the indicators, it is not possible to measure in accordance with the methodology of measurement of this indicator (in the absence of data availability) from the MoF, but reserving the right to receive and assess them in the future and to include them in the next monitoring report of the ISAC (6M1 2026).

In conclusion, in the absence of complete information for the assessment of both indicators for this objective, we consider the non-inclusion in the measurement of the status of the objective and its implementation and its inclusion in the next monitoring report of the ISAC, that of 6M1 2026.

The presentation of the achievement of indicators 1.5.1 and 1.5.2, according to the Indicator Passport, is as follows:

|                 |                             |  |
|-----------------|-----------------------------|--|
| Baseline values | 2023                        |  |
|                 | N/A                         |  |
|                 | 2024                        | 1.5.1 Preparation of the assessment<br>1.5.2 Preparation of the assessment   |
|                 | 2025                        | 1.5.1 5% increase in the number of internal and external audits carried out<br><br>1.5.2 80% of internal and external audit recommendations implemented                |
|                 | 2026                        | 1.5.1 10% increase in the number of internal and external audits carried out (cumulative)<br><br>1.5.2 90% of internal and external audit recommendations implemented  |
|                 | 2027                        | 1.5.1 15% increase in the number of internal and external audits carried out (cumulative)<br><br>1.5.2 95% of internal and external audit recommendations implemented  |
|                 | 2028                        | 1.5.1 20% increase in the number of internal and external audits carried out (cumulative)<br><br>1.5.2 100% of internal and external audit recommendations implemented |
|                 | 2029                        | 1.5.1 25% increase in the number of internal and external audits carried out (cumulative)<br><br>1.5.2 100% of internal and external audit recommendations implemented |
| Target value    | year 2025 (targeted)        | 1.5.1 5% increase in the number of internal and external audits carried out (cumulative)<br>1.5.2 80% of internal and external audit recommendations implemented       |
|                 | year 2025 (achieved target) | Not measured <sup>46</sup>   |

### Level of achievement of objective 1.5

The level of achievement of *Objective 1.5 Protection of public finances and assets from misuse during the exercise of public function*, in relation to the performance indicators for the period January - December 2025, is **not measured**.

<sup>46</sup> The data for the performance indicator can be obtained, administered and assessed in May 2026, and will become part of the monitoring report of 6M1 2026.

The calculation has been carried out by measuring and evidencing the data and information included in this report, in accordance with the provision made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption , 2024-2030.

The calculation has been carried out according to the following formula:

$$NR 1.5 = \frac{TP 1.5.1 (-\%) + TP 1.5.2 (-\%)}{2 TP} \times 100\% = -47\%$$

### **Data verifiability**

Inability to measure the objective based on performance indicators.

### **Risks for the achievement of Objective 1.5**

For the year 2025, the achievement of the objective has resulted at high risk also due to the impossibility of measuring the objective based on the performance indicators.

## ***1.6 Strengthening of the whistleblowing framework for the early detection of corruption.***

or this objective, 1 performance indicator is defined:

*1.6.1: Percentage of legal and sublegal acts on whistleblowing and the protection of whistleblowers, adopted, out of those planned to be adopted (increasing trend).*

The action plan for Objective 1.6, for the period January–December 2025, foresees 10 activities and 4 measures.

The target value for performance indicator 1.6.1 for the year 2025 is: Preparation and approval of the law on the protection of whistleblowers.

In order to achieve the value of the indicator in accordance with the performance indicators passport and specifically with the action plan 2024–2026, activities (10) and measures (4) are foreseen as follows.

|         |   |
|---------|---|
| 1.6.1   | Strengthening of the institutional framework for whistleblowing   |
| 1.6.1.1 | Assessment report on the implementation of the law on whistleblowing and protection of whistleblowers   |
| 1.6.1.2 | Preparation of amendments to the legal framework on whistleblowing and protection of whistleblowers, in the framework of harmonization with the EU Directive                    |
| 1.6.1.3 | Approval of amendments to the law on whistleblowing and protection of whistleblowers, in the framework of harmonization with the EU Directive                                   |
| 1.6.2   | Strengthening of the institutional framework for whistleblowing   |
| 1.6.2.1 | Assessment of the functioning of the responsible units for whistleblowing, the way of communication, cooperation and reporting of cases (reports, assessments and data, annual) |
| 1.6.2.2 | Establishment of whistleblowing units (where missing) and completion of their staff   |

<sup>47</sup> Ibid footnote 39.

|         |   |
|---------|---|
| 1.6.2.3 | Organization of trainings to increase the expertise and capacities of the persons in charge of whistleblowing   |
| 1.6.3   | Improvement of tools for reporting corruption and encouragement for reporting corruption  |
| 1.6.3.1 | Assessment of existing tools and ways for whistleblowing in institutions of all levels, at central and local level and in the private sector (identification of opportunities for improvement)    |
| 1.6.3.2 | Creation of tools and ways for whistleblowing in institutions where they are missing (online, telephone, regular mail, in-person reporting)   |
| 1.6.3.3 | Educational and promotional campaigns for whistleblowing in the public and private sector and in society  |
| 1.6.4   | Improvement of protection for individuals who report corruption (whistleblowing)  |
| 1.6.4.1 | Informative and educational brochures for explaining the importance of whistleblowing, the rights of whistleblowers and the obligation of institutions for their protection (annual publications) |

The implementation of the planned measure is carried out through activities that continue throughout the whole year, as mentioned, the initiation of the process of drafting the new legal framework for whistleblowing and the protection of whistleblowers, the operationalization of whistleblowing units and increased information about them.

*During January – December 2025*, the legal analysis and the process of reviewing Law no. 60/2016 “On whistleblowing and the protection of whistleblowers” has been carried out, with the aim of transposing Directive (EU) 2019/1937. A detailed assessment process has been consolidated by the Inter-Institutional Working Group, established by Order of the Prime Minister no. 65, dated 28.05.2025 “On the assessment, analysis and drafting of legal amendments”, led by the Minister of State for Public Administration and Anti-Corruption. The draft law has been finalized with 28 articles, ensuring the full transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council, dated 13 October 2019 “On the protection of persons who report breaches of Union law”, into the domestic legal framework. The law was approved by the Assembly of the Republic of Albania in December 2025, together with the Table of Concordance. The process of drafting the law has been followed and supported by the technical assistance of the EU4GG project at the Delegation of the European Union and has followed a satisfactory process of public consultation, with the participation of central public institutions and subordinate institutions, the business community, civil society and academia, where the mechanisms for the protection of whistleblowers, ensuring confidentiality and the functioning of reporting channels were discussed. On 26 November 2025, the Council of Ministers approved the draft law and submitted it to the Assembly of the Republic of Albania for parliamentary review. Subsequently, on 18 December 2025, the Assembly of the Republic of Albania approved the new law “On whistleblowing and the protection of whistleblowers”, concluding the legislative process for one of the main acts of the “Anti-Corruption” legislative package. The approved law establishes a complete and unified framework for reporting violations and suspected cases of corruption in the public and private sector, ensuring effective protection for whistleblowers, preservation of confidentiality and the proper functioning of internal and external reporting channels. The new legal approach aims to strengthen individuals’ trust to report in good faith and to increase institutional capacities for identifying and addressing violations. The approval of the law is the

result of the joint work of the Minister of State for Public Administration and Anti-Corruption, in the capacity of the responsible minister and proposer of the act, the General Directorate of Anti-Corruption, as the technical drafting authority, and HIDAACI, as the authority responsible for the implementation of the law.

In January 2025, in accordance with the applicable legal provisions, HIDAACI carried out the analysis of the reports of the Responsible Units in the public and private sector for the year 2024, where it resulted that 182 annual reports were received and administered from the Responsible Units within public authorities. From the analysis of the submitted reports of the public sector, it is noted that in 2 Responsible Units, 2 cases were reported and handled. Regarding the Responsible Units in the private sector, 258 whistleblowing reports were received and administered. From the analysis of the submitted reports, it is noted that in 1 Responsible Unit, 10 whistleblowing cases were reported and handled.

In 2025, 52 new Responsible Units from the private sector were established and staffed. In total, 185 Responsible Units in the public sector and 526 Responsible Units in the private sector are established. The Responsible Units have taken measures to complete their staffing, resulting in a total of 361 employees in public sector units and 960 employees in private sector units.

Regarding information and awareness on whistleblowing, ASPA has conducted a training for civil servants of central and local government and independent institutions with the topic: “Whistleblowing and the protection of whistleblowers” with the participation of 94 persons, staff of the public administration. Meanwhile, during this period, no other informational and awareness-raising measures have been provided.

With reference to activities 1.6.3.1, 1.6.3.2, 1.6.3.3 and 1.6.4.1, there has been no implementation of them during 2025. The new law “On whistleblowing and the protection of whistleblowers” was published in the Official Gazette on 21.01.2026, and the implementation of these activities will continue in accordance with the provisions and deadlines provided in this new legal framework.

As above, the measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 1.6.1. The successfully completed process of the approval of the law “On whistleblowing and the protection of whistleblowers” by the Assembly of the Republic of Albania<sup>48</sup> in December 2025 addresses the achievement of the indicator and the expected result for this objective for this year of the ISAC. This performance indicator has been achieved at the level of 100%.

The presentation of the achievability of indicator 1.6.1 according to the Indicator Passport is presented as follows:

|  |      |                               |
|--|------|-------------------------------|
|  | 2023 |                               |
|  | N/A  |                               |
|  | 2024 | Preparation of the assessment |

<sup>48</sup> Law no. 96/2025 “On whistleblowing and the protection of whistleblowers”.

|                              |                                    |  |
|------------------------------|------------------------------------|--|
| <b>Baseline Values</b>       | 2025                               | Preparation and approval of the law on the protection of whistleblowers  |
|                              | 2026                               | Preparation and approval of sub-legal acts related to the amendments to the Law on Whistleblowing and the Protection of Whistleblowers |
|                              | 2027                               | Implementation of the law and sub-legal acts on the protection of whistleblowers   |
|                              | 2028                               | Implementation of the law and sub-legal acts on the protection of whistleblowers   |
|                              | 2029                               | Implementation of the law and sub-legal acts on the protection of whistleblowers   |
|                              | 2030                               | Implementation of the law and sub-legal acts on the protection of whistleblowers   |
| <b>Target Value / Target</b> | <b>Year 2025 (target value)</b>    | Preparation and approval of the law on the protection of whistleblowers  |
|                              | <b>Year 2025 (achieved target)</b> | <b>100%</b>  |

### **Level of achievement of Objective 1.6**

The level of achievement of *Objective 1.6 Strengthening the whistleblower framework for the early detection of corruption* in relation to the achievement of the performance indicator for the period January – December 2025 is **100%**.

The calculation has been carried out by measuring and evidencing the data and information included in this report, in accordance with the provision made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption , 2024–2030.

The degree of achievement of Objective 1.6 for this reporting period is **100%**.

### **Verifiability of data**

The data reported on the performance indicators are based on the information administered by the General Directorate of Anti-Corruption.

### **Risks for the achievement of Objective 1.6**

For the year 2025, no risk has been identified.

### ***1.7 Strengthening financial transparency and integrity of political parties.***

For this objective, 1 performance indicator has been defined:

#### ***1.7.1: Drafting of the Law on the Financing of Political Parties***

The action plan for Objective 1.7, for the period January–December 2025, foresees 3 activities and 2 measures.

The target value *for performance indicator 1.7.1* for the year 2025 is: Preparation of the assessment (analysis carried out) for the law on the Financing of Political Parties.

To achieve the value of the indicator in accordance with the performance indicator passport and specifically with the action plan 2024–2026, activities (3) and measures (2) have been foreseen as follows.

|         |   |
|---------|---|
| 1.7.1   | Strengthening the financial transparency of political parties   |
| 1.7.1.1 | Analysis for the review of the legal framework on the transparency of political party financing   |
| 1.7.1.2 | Review of the financial reporting format of political parties, including in-kind donations and increased control over possibilities for money laundering in their financing |
| 1.7.2   | Promoting the importance of financial transparency and integrity of political parties   |
| 1.7.2.1 | Improving transparency and access to financial reports of political parties and audits of the financial activity of political parties (increased publications)              |

The implementation of the planned measures is carried out through activities that continue throughout the year, as mentioned, including the review with the aim of improving controls over the finances of political parties and increasing their transparency.

During *January – December 2025*, the assessment analysis has been completed to strengthen the control of political party finances and of candidates for political functions participating in electoral campaigns. The analysis has been carried out by the group of experts of the Special Parliamentary Committee, “On the deepening of reforms for good governance, the rule of law and anti-corruption for Albania 2030 in the European Union,” in the Assembly<sup>49</sup>. The analysis document has reviewed the country’s existing legal framework on this matter, the recommendations and proposals left to Albania for the most effective addressing of the field, and the concrete proposals. The analysis guides the intervention of the legal framework into concrete intervention variants, which are expected to ensure legal coverage for: Sources of financing: permitted and prohibited, including the regulation of in-kind financing and loans; Transparency: mandatory and real-time publication of donations above a certain threshold (e.g. 50,000 ALL); Reporting: obligation for pre-, during-, and post-campaign reporting; Oversight: establishment of a specialized unit within the CEC or an independent body for financial control; Third parties: prohibition and regulation of political advertising and interference by entities that are not part of the electoral race; Sanctions: effective, proportionate and enforceable sanctions for violations of the provisions; and Online reporting and audit: development of a dedicated platform for electronic reporting and public tracking.

In 2025, monitoring was carried out and reports were prepared on the activities of political parties regarding their finances. These reports are easily accessible on the website of CEC at the following link: [www.fpp.kqz.gov.al/kreu/reports](http://www.fpp.kqz.gov.al/kreu/reports). A total of 1,610 monitoring reports for political parties and candidates running for political office have been published on this website. The reports contain data on the political activities of the monitored entities, their organization, and the units used by them. On the main portal of the Central Election Commission, space has been dedicated to promoting financial transparency and the integrity of political entities, as structured information

<sup>49</sup> <https://masl.al/financimi-i-partive-politike-ekspertet-mblidhen-ne-kuvend-per-hartimin-e-nje-drafti-te-ri-ligjor/>.

about them can be found there<sup>50</sup>. The CEC has ensured the publication and public access to financial reports for two electoral processes during 2025. Expanded monitoring of the electoral campaign has enabled the identification of violations and the taking of relevant administrative measures (81 measures), while no violations were found for the local by-elections. Transparency and accountability have been improved through the full publication of reports and the development of a more accessible format for the public.

Furthermore, the financial reporting formats for parties and candidates have been reviewed and approved, in accordance with Article 92/2, point 3.1 of the Electoral Code (the obligation for the CEC to approve the models within 10 days from the entry into force of the law). With Decision of the KR No. 11, dated 27.02.2025, “On certain amendments to Decision No. 18, dated 14.4.2021, of the Regulatory Commission ‘On the approval of guidelines on financial reporting by political parties, multi-member list candidates and candidates nominated by voters for the election campaign for elections to the Assembly of Albania’,” the reporting guidelines (amendments to Decision No. 18, dated 14.04.2021) were updated, specifying the reporting of in-kind donations, the separation of expenses for social media advertising as a distinct item, and the requirement for banking documentation for amounts over 50,000 ALL. In line with these interventions, a training package has also been prepared for user entities, such as political party financial officers. This training package has been developed with the capacity and financial support of the CEC from the state budget.

The above measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 1.7.1. The Central Election Commission, within the framework of the reform process for the control of political parties in the Assembly of the Republic of Albania, has prepared a comprehensive package of proposals for the revision of the financial reporting format of political parties. The process has been accompanied by a consultation process with the group of experts at the Assembly of the Republic of Albania, with the aim of addressing the issues identified in the practice of financial reporting. As a result of this process, 100% of the recommendations drafted by the CEC have been integrated into the draft law “On the Financing of Political Parties,” which is currently under consideration in the Assembly. As a result, based on the administered data, this performance indicator has been achieved at 100%

The presentation of the achievement of indicator 1.7.1 according to the Indicator Passport is presented as follows:

|                        |      |  |
|------------------------|------|--|
| <b>Baseline values</b> | 2023 |  |
|                        | N/A  |  |
|                        | 2024 | Preparation of the assessment  |
|                        | 2025 | Preparation of the assessment (analysis completed) for the Law on the Financing of Political Parties |
|                        | 2026 | Drafting of the new legal framework for the Financing of Political Parties                           |
|                        | 2027 | Approval of the new legal framework for the Financing of Political Parties                           |
|                        | 2028 | Approval of the necessary secondary legislation and implementation of the law                        |

<sup>50</sup> <https://kqz.gov.al/perf>.

|                       |                             |  |
|-----------------------|-----------------------------|--|
|                       | 2029                        | Implementation of the law  |
|                       | 2030                        | Implementation of the law  |
| Target value / Target | Year 2025 (planned target)  | Preparation of the assessment (analysis completed) for the Law on the Financing of Political Parties |
|                       | Year 2025 (achieved target) | 100%   |

### Level of achievement of Objective 1.7

The level of achievement of Objective 1.7, *Strengthening financial transparency and the integrity of political parties*, in relation to the implementation of the performance indicator for the period January – December 2025, is **100%**.

The calculation has been carried out by measuring and identifying the data and information included in this report, in accordance with the forecast made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The level of achievement of Objective 1.7 for this reporting period is **100%**.

### Data verifiability

The reported data on the performance indicators are based on information reported by the CEC and other data managed and coordinated by the General Directorate of Anti-Corruption.

### Risks for the achievement of Objective 1.7

For the year 2025, no risk has been identified.

### 1.8 Establishment of the legal and institutional framework for lobbying as an instrument for corruption prevention.

For this objective, 1 performance indicator has been defined:

*1.8.1: Ratio of the number of drafted legal and sub-legal acts on lobbying to the number of those planned for adoption (increasing trend).*

The action plan for Objective 1.8, for the period January–December 2025, foresees 2 activities and 1 measure.

The target value for *performance indicator 1.8.1* for the year 2025 is: Preparation of the Law on Lobbying (phases of assessment and preliminary analysis)).

To achieve the indicator value in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, activities (2) and measure (1) are foreseen as follows.

|         |   |
|---------|---|
| 1.8.1   | Establishment of the legislative and institutional framework for lobbying   |
| 1.8.1.1 | Detailed analysis of international standards and best practices on lobbying |

The implementation of the foreseen measure has been carried out through the planned activities for this implementation period, focused on the preparation of the legal analysis and the drafting of the new legal framework for lobbying in Albania.

*During January–December 2025*, a comprehensive legal analysis has been carried out, which will precede the drafting of the internal legal framework for lobbying in Albania. The Minister of State for Public Administration and Anti-Corruption, in his capacity as the responsible minister for the field, has authorized the technical staff of the General Directorate of Anti-Corruption, in the role of the Technical Secretariat, to prepare an analytical technical document on the revision of the existing legal framework and the formulation of concrete recommendations for its drafting in accordance with international standards. The analysis document has been prepared, also presenting concrete proposals for drafting a law in this field and outlining the design of the relevant secondary legislation.

The analysis shows that the future legal framework on lobbying should apply to all public officials, including civil servants and individuals within private entities exercising public authority, while specifying those categories of subjects that should not be part of its regulation. It also provides clear definitions of key terms such as “lobbying,” “public decision-making,” and “lobbyist,” in order to ensure a consistent and uniform application of the law, and establishes the general principles governing lobbying activities, including transparency, integrity of public decision-making, and the recognition of lobbying as a legitimate activity within the democratic process. The analysis also includes examples and regulatory practices of lobbying in other countries, mainly from the European Union, and addresses options for the organization of the responsible regulatory authority in the field. The preparation of this technical document has been closely assisted by the Council of Europe Office in Tirana. The preparation of this technical document has been closely assisted by the Council of Europe Office in Tirana.

Subsequently, on 31 July 2025, GDoA, in cooperation with the technical assistance of the Council of Europe, held a roundtable for the presentation of the analysis for the drafting of the legal framework. The findings and proposals for the structure of the law were presented at the roundtable.

Following this process, the drafting of the draft law “On Lobbying” was initiated, and during the months September–December 2025, the legal act was drafted, consulted, and approved. On 30.12.2025, the Council of Ministers approved the draft law “On Lobbying in the Republic of Albania,” giving the legislative initiative the status of initiation of parliamentary procedures. The approval of the draft law is the result of the joint work of the Minister of State for Public Administration and Anti-Corruption, in his capacity as the responsible minister and proposer of the act, and the General Directorate of Anti-Corruption, in the role of the technical authority responsible for drafting the legal framework, in cooperation with experts of the Council of Europe. The draft law ensures compliance with Recommendation CM/Rec(2017)2 of the Council of Europe and European best practices on lobbying transparency, further strengthening the national anti-corruption framework and supporting the European integration process.

In view of the above, the measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 1.8.1. The Minister of State for Public Administration and Anti-Corruption has led the process of assessment, drafting, public consultation, submission of the legal act to the Council of Ministers, and its approval on 30 December 2025. Through the Inter-Institutional Working Group and together with the General Directorate of Anti-Corruption (technical secretariat), the process was fully and properly carried out, enabling the advancement, ahead of the ISAC planning, of the adoption of the law by the Council of Ministers. As a result, based on the administered data, this performance indicator has been achieved at 100%.

The presentation of the achievement of indicator 1.8.1 according to the Indicator Passport is presented as follows:

|                                    |                              |  |
|------------------------------------|------------------------------|--|
| <b>Baseline values</b>             | 2023                         |  |
|                                    | N/A                          |  |
|                                    | 2024                         | Preparation of the assessment  |
|                                    | 2025                         | Preparation of the Law on Lobbying (phases of assessment and preliminary analysis) |
|                                    | 2026                         | Preparation of the Law on Lobbying (drafting and consultation phases)              |
|                                    | 2027                         | Adoption of the Law on Lobbying  |
|                                    | 2028                         | Adoption of secondary legislation related to the Law on Lobbying                   |
|                                    | 2029                         | Implementation of the law and secondary legislation on lobbying                    |
|                                    | 2030                         | Implementation of the law and secondary legislation on lobbying                    |
|                                    | <b>Target value / Target</b> | <b>Year 2025 (planned target)</b>  |
| <b>Year 2025 (achieved target)</b> |                              | <b>100%</b>  |

### **Level of achievement of Objective 1.8**

The level of achievement of Objective 1.8 “*Establishment of the legal and institutional framework for lobbying as an instrument for corruption prevention,*” in relation to the implementation of the performance indicator for the period January – December 2025, is **100%**.

The calculation has been carried out by measuring and identifying the data and information included in this report, in accordance with the forecast made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The level of achievement of Objective 1.8 for this reporting period is **100%**.

### **Data verifiability**

The reported data on the performance indicators are based on information managed and coordinated by the General Directorate of Anti-Corruption.

## Risks for the achievement of Objective 1.8

For the year 2025, no risk has been identified.

### 1.9 Promotion of integrity in the private sector.

or this objective, 1 performance indicator has been defined:

*1.9.1: Percentage of private sector entities with which public institutions have established cooperation for the development and promotion of integrity in the private sector out of the number of cooperation agreements established in the previous year (increasing trend)*

The action plan for Objective 1.9, for the period January–December 2025, foresees 3 activities and 1 measure.

The target value for *performance indicator 1.9.1* for the year 2025 is: a 5% increase in the number of private sector entities with which public institutions have established cooperation.

To achieve the indicator value in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, activities (3) and measure (1) are foreseen as follows.

|         |  |
|---------|--|
| 1.9.1   | <b>Promotion of the demand for integrity in the private sector</b>   |
| 1.9.1.1 | Creation of a cooperation network and formalization of cooperation relations between the public authority responsible for anti-corruption policies and active chambers of commerce and business (cooperation agreements/anti-corruption clauses) |
| 1.9.1.2 | Cooperation with chambers of commerce and business (periodic and regular meetings), information sharing, coordination and consultation of initiatives through awareness campaigns  |
| 1.9.1.4 | Drafting of model Codes of Ethics and Integrity Plans for private companies as anti-corruption instruments in accordance with international standards  |

The implementation of the foreseen measure is carried out through the activities planned to be implemented throughout the year, in order to create opportunities for cooperation and increase awareness of the private sector on integrity in the fight against corruption.

*During January–December 2025*, it has been aimed to formalize cooperation relations between public authorities with anti-corruption competencies and business representatives, with the purpose of sharing and receiving feedback on anti-corruption initiatives such as the establishment of mechanisms, complaint and reporting systems, the integrity framework, and consultation on anti-corruption policies. This will now be realized through a formalized cooperation through a cooperation agreement.

The draft agreement has been prepared by the General Directorate of Anti-Corruption, but remains under the process of agreement and approval. The agreement will give life to the establishment of a cooperation coalition aimed at bringing to the dialogue table the private sector, public sector, and civil society stakeholders (academia) to build a discussion agenda and undertake actions on issues related to private sector integrity.

Among the objectives of the draft agreement are: (1) to build a sustainable work agenda in the field of anti-corruption (private sector integrity) with representatives of the private sector, public sector, and academia; (2) to activate dialogue among actors through this platform, enabling an inclusive voice in addressing solutions and various issues; (3) To organize annual activities such as conferences, trainings, forums, etc. in the field of anti-corruption in the format of public awareness weeks, (4) To develop integrity-related tools, in the Albanian language, for use by public and private sector entities (such as: Code of Ethics, manual/guide on gifts and hospitality, guide on conflict of interest, etc.); (5) To promote the use of practical tools developed by international institutions in the field of anti-corruption, such as the UN, OECD, ICC, etc., for both the public and private sectors; (6) To enable the translation into Albanian of international instruments produced by international organizations for Albanian public and private actors; (7) To periodically conduct a needs assessment and identify priority issues for action by the coalition; (8) To establish working groups on specific topics according to identified needs; (9) To engage in cooperation for various anti-corruption activities in order to develop dialogue and promote best practices; and (10) To carry out any other activities as decided by the coalition.

Based on the implementation of concrete activities for this monitoring period, reference is made to the scheduled participation<sup>51</sup> of representatives of the authority responsible for anti-corruption in the meeting of the ICC Albania Commission for Sustainable Development and Integrity. Issues such as ethical leadership integration, transparency, and policy advocacy in line with the best international standards and the EU integration process, as important components in anti-corruption cooperation, remain in focus for discussion and cooperation respectively.

During June 2025, the line ministry for economic policies and cooperation with the private sector organized 4 meetings and informational activities in cooperation with the Chambers of Business, in which topics related to aspects of integrity in business or in vulnerable or regulated sectors were addressed. We mention: the “Information Day” activity to present the Guide on European Union Financial Programmes, a practical and comprehensive instrument for increasing access to European funding, with the aim of assisting businesses, associations, organizations, academia, and Albanian public institutions to benefit from the opportunities offered by European programmes, especially in terms of: (a) increasing the competitiveness of businesses in European markets, (b) international cooperation and accelerating EU integration, and (c) opportunities to benefit from grant schemes to facilitate business access to finance. A roundtable on Chapter 3 “Right of Establishment and Freedom to Provide Services,” with 40 participants from businesses, state institutions, and civil society. The topic of the roundtable was “Informing the private sector on the reform of Law No. 66/2016 ‘On Services’ and alignment with the EU Services Directive.” A roundtable on Chapter 6 “Company Law,” with 45 participants from state institutions, businesses, and chambers of commerce. The topic of the roundtable was “Presentation of the legal basis for alignment with EU Directives in the framework of European integration for Chapter 6.” A roundtable on Chapter 20 “Enterprises and Industrial Policy,” with 50 participants from state institutions, businesses, and chambers of commerce. The topic of the roundtable was “Presentation of the Draghi report on competitiveness in the EU.”

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<sup>51</sup> Launched to be implemented on 3 July 2025.

In October 2025, at the initiative of the General Directorate of Anti-Corruption, it joined the initiative for embedding integrity in the organization and activity of the private sector (businesses and companies). The roundtable “*From integrity to compliance*” brought together the public sector and the private sector, addressing the strategic planning of the anti-corruption fight 2024–2030, for more integrity, legality, correct operation, and anti-corruption measures. The American Chamber of Commerce, in cooperation with the technical expertise of IDM Albania, announced the launch of the development of practical skills for managing corruption risks and conflict of interest in private companies, through the use of self-regulation instruments such as codes of ethics, integrity plans, and whistleblowing units.

As stated above, the measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 1.9.1. The activities carried out by the line ministry and other authorities, as well as the General Directorate of Anti-Corruption in the exercise of its mandate, have influenced the increase of interaction with the private sector (its organizations) in relevance to anti-corruption policies and tools and the improvement of instruments for action, such as integrity instruments. As a result, based on the administered data, this performance indicator has been achieved at 100%.

The presentation of the achievement of indicator 1.9.1 according to the Indicator Passport is presented as follows:

|                              |                                      |   |
|------------------------------|--------------------------------------|---|
| <b>Baseline values</b>       | 2023                                 |   |
|                              | N/A                                  |   |
|                              | 2024                                 | Preparation of the assessment   |
|                              | 2025                                 | 5% increase in the number of private sector entities with which public institutions have established cooperation  |
|                              | 2026                                 | 10% increase in the number of private sector entities with which public institutions have established cooperation |
|                              | 2027                                 | 15% increase in the number of private sector entities with which public institutions have established cooperation |
|                              | 2028                                 | 20% increase in the number of private sector entities with which public institutions have established cooperation |
|                              | 2029                                 | 25% increase in the number of private sector entities with which public institutions have established cooperation |
|                              | 2030                                 | 30% increase in the number of private sector entities with which public institutions have established cooperation |
| <b>Target value / Target</b> | <b>viti 2025 (targeti i synuar)</b>  | 5% increase in the number of private sector entities with which public institutions have established cooperation  |
|                              | <b>viti 2025 (targeti i arritur)</b> | <b>100%</b>   |

### Level of achievement of Objective 1.9

The level of achievement of Objective 1.9 *Promotion of integrity in the private sector*, in relation to the implementation of the performance indicator for the period January-December 2025, is **100%**.

The calculation has been carried out by measuring and identifying the data and information included in this report, in accordance with the forecast made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption 2024–2030.

The level of achievement of Objective 1.9 for this reporting period is **100%**.

### Data verifiability

The reported data on the performance indicators are based on information managed and coordinated by the General Directorate of Anti-Corruption.

### Risks for the achievement of Objective 1.9

For the year 2025, the achievement of the objective has resulted in low risk, indicating that cooperation will be finalized and concrete cooperation with the private sector will be developed.

### *Realizability of the specific objectives of the strategic goal for corruption prevention (Preventive Policy - I)*

Based on the data reported by the institutions responsible for the administration and processing of performance indicator data, the table below presents the level of achievement of the 9<sup>52</sup> specific objectives of the strategic goal for corruption prevention. By applying the same formula for calculating the level of achievement of objectives—adding the achievement percentages of the performance indicators and dividing by the number of indicators—the achievement of the strategic goal for corruption prevention is **90%**.

| Specific Objective  | Achievement        |
|---|--------------------|
| 1.1 Strengthening the legal framework and institutional capacities in corruption prevention                             | 95%                |
| 1.2 Strengthening transparency, accountability and integrity of public institutions at all levels of governance         | 100%               |
| 1.3 Development of a sustainable approach to corruption prevention in high-risk sectors (high prevalence of corruption) | 25%                |
| 1.4 Strengthening corruption prevention mechanisms in local self-government units                                       | 100%               |
| 1.5 Protection of public finances and public assets from misuse during the exercise of public functions                 | - <sup>53</sup> 0% |

<sup>52</sup> 8 objectives, noting the inability to measure Objective 1.3.

<sup>53</sup> The data for the performance indicator can be collected, administered and assessed in May 2026, and will be included in the monitoring report of 6M1 2026.

|  |      |
|--|------|
| 1.6 Strengthening the whistleblowing framework for early detection of corruptio  | 100% |
| 1.7 Strengthening financial transparency and integrity of political parties  | 100% |
| 1.8 Establishment of the legislative and institutional framework for lobbying as an instrument for corruption prevention | 100% |
| 1.9 Promotion of integrity in the private sector   | 100% |

The achievement of the strategic goal for corruption prevention reached the level of 90%, and signals the continuity of a positive trend in the implementation of measures during the period *January – December 2025*.

As a result, significant progress was made in the adoption of legal acts such as the law on asset recovery, the law on whistleblowing and protection of whistleblowers, as well as the initiation of the concrete preparation of the legal framework for lobbying (approved by CM), the financing of political parties, and the law on the prevention of conflict of interest in the exercise of public functions (as part of the “anti-corruption” legislative package). Likewise, the Methodology for the Assessment of Corruption Risk Areas for the Services of the Assembly was approved and the process for 8 legal acts was carried out, of which 3 were carried out with independent technical expertise outside the public administration, such as: the draft law on the Mountain Package; the draft law on Extended Responsibilities of Producer Entities that Generate Waste; and the draft law on State Material Reserves, as well as the assessment of corruption risk areas of laws being drafted, specifically 1050 draft acts (draft laws and draft decisions of the Council of Ministers). Regular information meetings and training sessions have been held for the Anti-Corruption Contact Point Network, focusing on reporting guidance and the preparation of anti-corruption analyses, in the framework of institutionalization and enhanced information for the Anti-Corruption Contact Point Network. GDoA and ASPA have coordinated the process and aligned the topics provided for these entities and members of this network. E-Albania provides 1,266 online public services, and all public authorities (367 authorities) have appointed an information rights coordinator. The registry of requests and responses has been installed in 25 new authorities and in total there are 272 authorities with this mechanism. The “*Explanatory Manual on the Right to Information*” has been drafted, designed in a question-and-answer format, where easily understandable information is provided in simpler language on procedures and the right of access to information. Asset declarations have been audited by declaring subjects (655 subjects). 185 Responsible Units have been established and are functioning in the public sector and 526 Responsible Units in the private sector. The integrity risk assessment has been carried out and risk factors have been analyzed and the Integrity Plan has been drafted in SCA. The evaluation has been completed and the subject program “Citizenship” for the 6th and 10th grades has been revised, including knowledge and topics on civic behavior and knowledge of the law, and cooperation between public authorities and the private sector has been improved.

The good and satisfactory implementation of performance indicators for objectives 1.1-1.9<sup>54</sup>, demonstrates sustained progress in achieving the objective during the *period January – December*

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<sup>54</sup> Excluding objective 11.3.

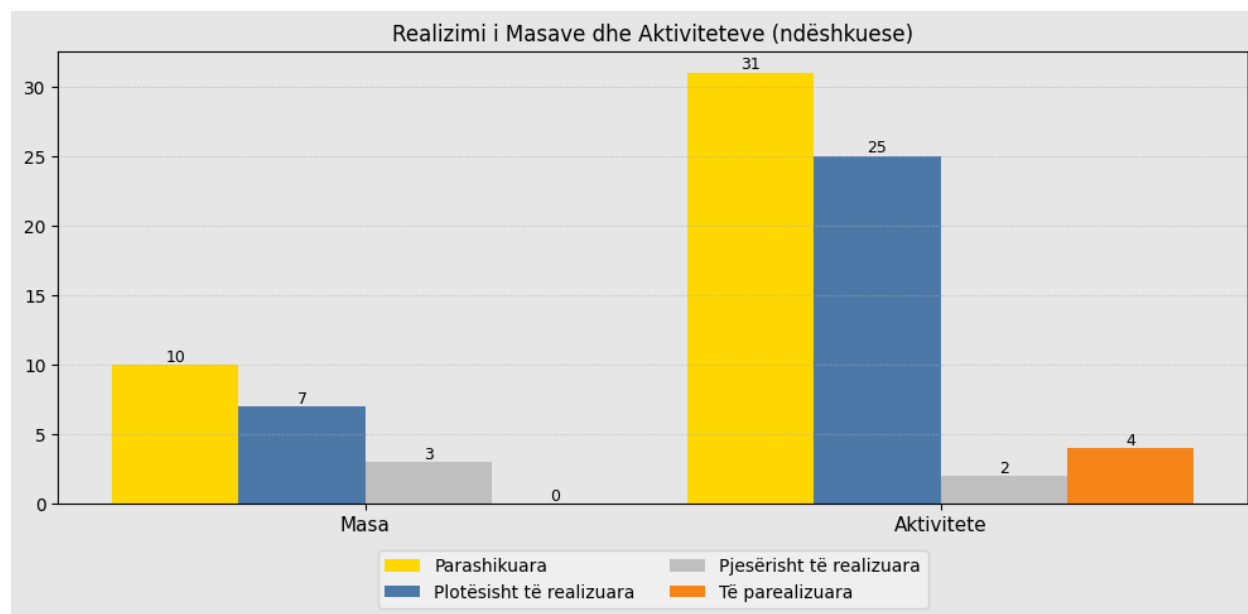
2025, in the fight against corruption and the promotion of good governance and preventive mechanisms.

***Punitive Policy (II) - Summary of achievements in the punishment of corruption***

Through the **objective of the ISAC punitive policy**, it aims that law enforcement institutions, and especially independent ones, which have a fundamental role in this process, must monitor the implementation of the law and the rule of law, thereby ensuring the transparency and integrity of state bodies. During the reporting period, the measures (products) and activities have been implemented according to the table below.

| Policy Objectives | Measures and Activities | Implementation of Measures and Activities         |   |   |   |
|-------------------|-------------------------|---|---|---|---|
|                   |                         | Planned measures and activities for the year 2025 | Fully implemented measures and activities | Partially implemented measures and activities <sup>55</sup> | Unimplemented measures and activities <sup>56</sup> |
| Punitive (II)     | Measures                | 10  | 7   | 3   | 0   |
|                   | Activities              | 31  | 25  | 2   | 4   |

It results that out of 10 measures and 31 activities foreseen in the 2024–2026 Action Plan, for the year 2025, for the Punitive Policy, 7 measures and 25 activities have been fully implemented, 3 measures and 2 activities partially implemented, and only 4 activities not implemented (activities: 2.1.2.1, 2.1.3.1, 2.2.1.1 and 2.2.3.2)

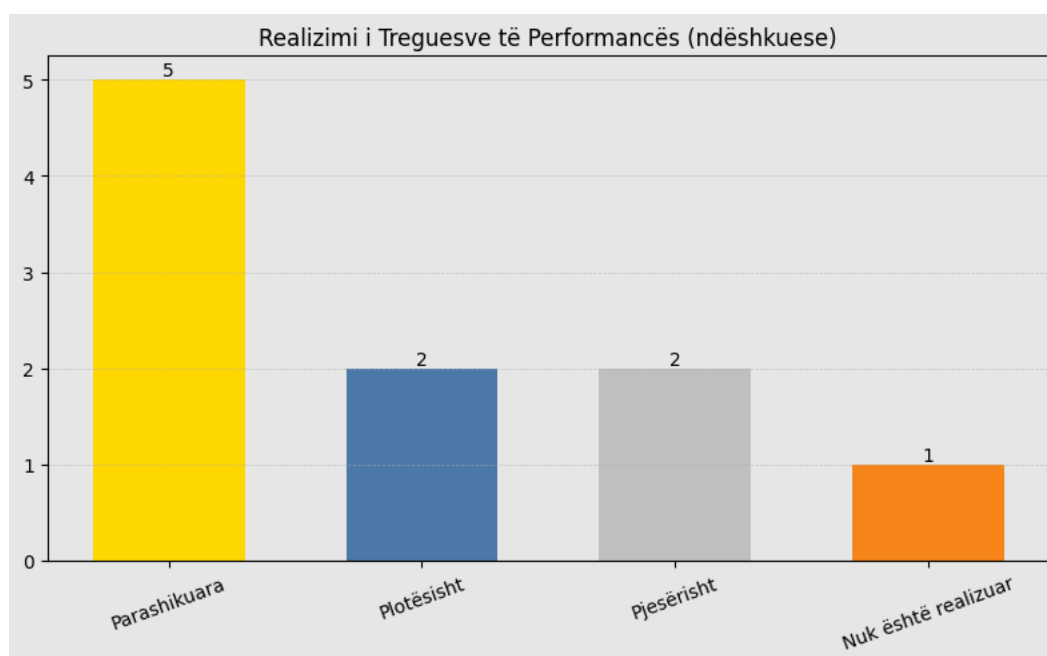


<sup>55</sup> A “partially implemented” activity is an activity that has been implemented at a level ranging from 50 to 100%.

<sup>56</sup> A “non-implemented” activity is an activity that has been implemented at a level ranging from 0 to 50%.

Out of the 5 performance indicators for the Punitive Policy (II), the target value has been achieved for 2 performance indicators, for 2 it has been only partially achieved, and for 1 (indicator 2.2.3) it has not been achieved.

| Punitive<br>(II) | Performance indicators | Implementation of Performance Indicators          |   |   |
|------------------|------------------------|---|---|---|
|                  |                        | Planned target value fully achieved <sup>57</sup> | Planned target value partially achieved <sup>58</sup> | Planned target value not achieved <sup>59</sup> |
|                  | 5                      | 2   | 2   | 1   |



## 2.1 Strengthening the legislative and institutional framework and capacities for effective administrative investigation of corruption.

For this objective, 1 performance indicator has been defined:

2.1.1: Percentage of analyses following administrative investigations with the aim of taking systemic measures against corruption (increasing trend).

The action plan for Objective 2.1, for the period January–December 2025, foresees 7 activities and 3 measures.

The target value for *performance indicator 2.1.1* for the year 2025 is: Coordination and full verification of received corruption reports, conducted analyses.

<sup>57</sup> Which has been implemented at a level of 100 percent.

<sup>58</sup> Which has been implemented at a level ranging from 50 to 100 percent.

<sup>59</sup> Which has not been implemented and for which data have not been collected or it has not been possible to collect data.

To achieve the indicator value in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, activities (7) and measures (3) are foreseen as follows.

|         |   |
|---------|---|
| 2.1.1   | Strengthening the institutional framework and coordination for the investigation and administrative verification of corruption  |
| 2.1.1.2 | Preparation of the internal regulation of the General Directorate of Anti-Corruption; rules for the operational activity of the anti-corruption network coordinators and the assessment of corruption risk  |
| 2.1.1.3 | Improvement of cooperation between anti-corruption coordinators, anti-corruption contact points and integrity coordinators, in relation to receiving and reporting corruption cases in the public administration (periodic meetings, exchange of information) |
| 2.1.2   | Strengthening institutional capacities for the investigation and administrative verification of corruption  |
| 2.1.2.1 | Identification of needs (assessment report) for expertise and increased skills of anti-corruption coordinators and preparation of specific curricula for trainings (annual)   |
| 2.1.2.2 | Organization of trainings to increase the expertise and skills of anti-corruption coordinators  |
| 2.1.3   | Increasing the performance of the structures responsible for the investigation and administrative verification of corruption  |
| 2.1.3.1 | Improvement of information exchange, cooperation and coordination between GDoA and HIDAACI regarding corruption complaints and reports, especially for cases coming from whistleblowing units   |
| 2.1.3.2 | Formalization of cooperation between law enforcement institutions with the aim of investigating criminal offenses in the field of corruption (cooperation agreement)  |
| 2.1.3.3 | Conducting analysis on the enforceability of recommendations sent by GDoA to institutions where irregularities have been identified   |

The implementation of the foreseen measure is carried out through the activities that continue throughout the year 2025, referring to the preparation of its internal regulatory acts (regulation) and the strengthening of the capacities of the directorate and the conduct of its activity.

*During January–December 2025*, the internal regulation of the General Directorate of Anti-Corruption was drafted and finalized, an act which regulates the activity and functioning of its technical structure. GDoA is organized and functions according to the principles of legality, unity and hierarchy, accountability, integrity, impartiality, effectiveness and efficiency, professional independence, as well as internal and inter-institutional cooperation. The Internal Regulation was approved by order of the Minister for Public Administration and Anti-Corruption, No. 3, dated 4.06.2025, and can be found at the link: [www.antikorrupsioni.gov.al/kreu/lista-dokumenteve/](http://www.antikorrupsioni.gov.al/kreu/lista-dokumenteve/).

The Internal Regulation is the first official act for the General Directorate of Anti-Corruption, since its establishment as a separate public budgetary authority, and it provides in detail the activity of its two technical directorates (Directorate of Policy Implementation in the Field of Anti-Corruption and Directorate of Analysis, Control and Administrative Investigation) and the Sector of Finance and Support Services. The regulation also provides the ways of GDoA's activity with the Anti-Corruption Coordinator mechanism, through which the competence of administrative verification and investigation is exercised. Chapter IV (Article 27 – Article 52) and Chapter V (Article 53 – 68) specifically provide for this part of GDoA's activity.

In 2025, regular working meetings were held at the General Directorate of Anti-Corruption with coordinators and anti-corruption competent structures in the authorities where the Anti-Corruption Coordinator is established. Meetings and the exchange of issues were addressed to all institutions where service to citizens remains a concern and were made known in the monthly bulletins “Anti-Corruption” of GDoA.

The technical staff of GDoA responsible for administrative investigation and verification, as well as the Anti-Corruption Coordinators, have been part of training sessions and knowledge acquisition on the methodology for corruption risk assessment and part of the curriculum “Steps of corruption risk assessment,” held on 6 May 2025. Also, assessments have been carried out to ensure sessions for strengthening the professional capacities of coordinators and anti-corruption contact points. ASPA has conducted in 2025 two thematic trainings, focused on the implementation of anti-corruption policies and conflict of interest, as well as on strengthening the culture of integrity and anti-corruption mechanisms. The trainings were organized with the audience of coordinators and anti-corruption contact points and aimed to increase their practical knowledge and skills in the exercise of their respective functions. A total of 41 participants took part in these training activities.

However, it should be noted that there is still no assessment report on the expertise and increased skills of anti-corruption coordinators and the preparation of specific curricula for trainings (annual) (activity 2.1.2.1).

In 2025, measures were undertaken to strengthen inter-institutional cooperation and coordination between authorities with anti-corruption competencies and those that have contact with citizens. GDoA has carried out active interactions mainly with those institutions where anti-corruption coordinators are located, for cases for which requests for verification and administrative investigations have been processed.

Also, in February 2025, the Special Prosecution Office signed a cooperation agreement with the Central Election Commission and the General Prosecution Office, with the aim of ensuring the integrity of the electoral process for the elections to the Assembly of Albania 2025. The agreement aims at coordinating measures for the prevention, identification and criminal prosecution of offenses related to the electoral process, contributing to strengthening the integrity and credibility of the electoral process and to the fight against corruption.

GDoA has finalized an Evaluation Report for the year 2025, in which all measures and recommendations and the status of their implementation are identified. A key part of this recommendations report are measures and requests for intervention in the State Cadastre Agency, an analysis and summary of all issues identified during administrative investigations with the aim of improving concrete procedures, updating regulatory acts and improving institutional or inter-institutional cooperation.

GDoA has addressed recommendations to the Regional Directorates of the State Cadastre Agency (in total 60 reports refer to findings of verifications and administrative investigations towards this institution, due to the large number of complaints received on property issues), the General

Directorate of Customs, the National Agency for Medicines and Medical Devices, the National Environmental Agency, as well as the National Inspectorate for Territory Protection, mainly based on the full analysis of facts and documentation administered during the administrative investigation process, as well as taking into account the nature of the identified violation, the impact it has had on the proper functioning of the respective institution, and the degree of individual responsibility of employees. GDoA has completed for the year 2025, 71 final evaluation reports, and has proposed 207 administrative measures and 234 recommendations. 32 cases have been forwarded for competence, as well as 336 cases have been prepared as archive memos and/or replies for which no cases of administrative proceedings are found. 2 criminal complaints have been submitted.

In 2025, there have been no cases of information exchange between GDoA and HIDAACI regarding corruption denunciations and reports, particularly for cases coming from whistleblowing units (activity 2.1.3.1).

As above, the measures and activities foreseen for the year 2025 have directly influenced the target value of performance indicator 2.1.1. The General Directorate for Anti-Corruption has carried out and completed the verification and administrative investigation of 439 cases, for which are referred: 71 final reports where 207 administrative measures and 234 recommendations have been proposed; 32 cases have been forwarded for competence, as well as 336 cases have been prepared as archive memos and/or reply letters for which there are no cases of administrative proceedings. There are 2 cases for which criminal complaints have been filed with the Prosecutor’s Office of the Court of First Instance of General Jurisdiction Tirana, for the criminal offence provided for in Article 248 of the Criminal Code “Abuse of Office”. As a result, based on the administered data, this performance indicator has been achieved at the level of 100%.

Presentation of the realization of indicators 2.1.1 according to the Indicator Passport, is presented as follows:

|                    |                                    |  |
|--------------------|------------------------------------|--|
| <b>Base Values</b> | 2023                               |  |
|                    | N/A                                |  |
|                    | 2024                               | Preparation of evaluation  |
|                    | 2025                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | 2026                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | 2027                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | 2028                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | 2029                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | 2030                               | Coordination and full verification of received corruption reports, analyses carried out        |
|                    | <b>year 2025 (targeted target)</b> | <b>Coordination and full verification of received corruption reports, analyses carried out</b> |

|                     |                             |      |
|---------------------|-----------------------------|------|
| Target value/Target | year 2025 (achieved target) | 100% |
|---------------------|-----------------------------|------|

### Level of realization of objective 2.1

Level of realization of *Objective 2.1. Strengthening the legislative, institutional framework and capacities for effective administrative investigation of corruption*, in relation to the realization of the performance indicator for the period January - December 2025 is **100%**.

The calculation has been carried out by measuring and identifying the data and information included in this report, in accordance with the provision made in the list of performance indicators, annex 2 of the Inter-Sectorial Strategy against Corruption, 2024-2030.

The level of realization of objective 2.1 for this reporting period is **100%**.

### Data verifiability

The reported data on the performance indicators are based on the information administered and coordinated by the General Directorate of Anti-Corruption.

### Risks for the realization of Objective 2.1

For the year 2025, the realization of the objective has resulted in low risk, ensuring the conduct of the analysis that will also guide measures for action and cooperation in the following years of implementation of the anti-corruption action plan.

### **2.2 Strengthening of capacities, resources and performance for effective criminal investigation and prosecution of corruption.**

For this objective, 3 performance indicators are defined:

*2.2.1: Percentage of legal and sub-legal acts approved for criminal investigation of corruption out of those planned to be approved.*

*2.2.2: Ratio of completed criminal investigations for corruption to investigations still ongoing (reduction of backlog) (increasing trend).*

*2.2.3: Percentage of the value of seized assets as a result of the investigation of corruption cases from the average value of seized assets in the last three years (increasing trend).*

The action plan for Objective 2.2, in the period January-December 2025 foresees 20 activities and 4 measures.

*2.2.1: Percentage of legal and sub-legal acts approved for criminal investigation of corruption out of those planned to be approved.*

The target value for *performance indicator 2.2.1* for the year 2025 is: Laws and sub-legal acts planned to be approved and approved. In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024-2026 action plan, activity (4) and measure (1) have been foreseen as follows.

|         |  |
|---------|--|
| 2.2.1   | Strengthening of the legislative framework to ensure an efficient activity for the criminal investigation and punishment of corruption   |
| 2.2.1.1 | Document (analysis) of assessment on the applicability of the legal and regulatory framework in the field of criminal investigation, addressing the requirements and recommendations of the EU   |
| 2.2.1.2 | Identification of laws and sub-legal acts that need improvement, their planning for approval   |
| 2.2.1.5 | Development of standard operating procedures for the identification of assets and financial resources of suspects of corruption and related parties during the investigation (ARO Standard Procedures), approved   |
| 2.2.1.7 | Approval of general guidelines for financial investigation by increasing the scope of financial investigation of SPAK, highlighting as a special part of investigative competencies in the fight against corruption (in relevance with the provision of chapter II: fight against corruption, part 3 (criminal investigation and punishment) of the Rule of Law Roadmap). (Note: this activity is in full implementation relevance with the provisions made in the IJS AP) |

The implementation of the foreseen measure is carried out through the activities foreseen for implementation throughout the period, as mentioned the preparation of preliminary acts (assessment analysis) for the drafting and approval of the legal framework, as well as regulatory acts of organization and functioning of ARO and operational instructions for the Special Prosecution Office.

*During January – December 2025*, actions have been undertaken related to the assessment of the applicability of the legal and regulatory framework in the field of criminal investigation, as well as the identification of needs for its improvement, in accordance with the requirements and recommendations of the European Union and the commitments mentioned in the “Rule of Law” roadmap chapters 23 and 24.

More specifically, the drafting and approval of acts and measures impacting the improvement of the legal and sub-legal framework of the field covering the criminal investigation and punishment of corruption has continued. Specifically, with Order no. 27061, dated 4.08.2025, the Head of the Special Prosecution Office has approved the “Strategy for reducing the number of pending cases 2025-2027”, with the aim of increasing the efficiency of investigations and improving case management. With the General Instruction <sup>60</sup> no. 1093, dated 11.11.2024, administrative and procedural measures have been defined for conducting financial and asset investigation by SPAK. This working document defines, standardizes and unifies the procedural manner of financial and asset investigation of cases, by the prosecutors of the Special Prosecution Office and the investigators of the National Bureau of Investigation. The approval of such an act also fulfills a commitment of the “Rule of Law” Roadmap within Chapter 23 (Fight Against Corruption: (3) Law enforcement – criminal investigation and punishment). Decision no. 231, dated 17.4.2025, the Priority Recommendations in the Fight Against Crime for the year 2025 have been approved, which serve as a guiding instrument for the responsible institutions. Also, within the framework

<sup>60</sup> Published in the link: <https://spak.gov.al/wp-content/uploads/2024/11/Udhezim-i-pergjithshem-nr-1093-date-11.11.2024-Masat-administrative-dhe-procedurale-per-kryerjen-e-hetimit-financiar-dhe-pasuror-ne-strukturen-e-Posacme-Kunder-Korrupsionit-dhe-Krimit-te-Organizuar.pdf>.

of mid-term planning and in implementation of strategic commitments, work has continued for the drafting of the new Criminal Code, as well as the Code of Criminal Procedure of the Republic of Albania.

In parallel, the General Prosecution Office within the framework of the European integration process has fulfilled obligations related to participation in the analytical review of legislation, the screening process, reporting for Chapters 4, 23 and 24, as well as reporting in MONEYVAL. Kodi i ri Penal përbën një prej akteve në proces diskutimi të tryezave konsultative ndërinstitucionale, me fokus veprat penale të korrupsionit, pastrimit të parave dhe krimeve të tjera ekonomike dhe financiare, si dhe veprat penale kundër veprimtarisë shtetërore dhe pasurisë. Janë dhënë mendime dhe sugjerime për përmirësimin e dispozitave përkatëse, në funksion të forcimit të kuadrit ligjor penal dhe përafrimit të tij me standardet evropiane.

For the year 2025, a detailed assessment document has not been developed regarding the applicability of the legal and regulatory framework in the field of criminal investigation, addressing the requirements and recommendations of the EU, while adhering to the document included in the *screening* reporting and which has supported the proposals of the “Rule of Law” roadmap for chapters 23 and 24, and the listed legal and sub-legal acts therein.

In this year, important developments have been carried out in the direction of strengthening investigative capacities and the tracing of assets of illegal origin, where the approval of the sub-legal act, Instruction no. 203, dated 27.11.2025, “On defining the rules and procedures for the selection of the candidate for director of the Asset Recovery Office” is mentioned. The approved instruction is also in line with the reform agenda and regulates the process of selection of the Director of the Asset Recovery Office. This office is under the authority of the State Police, with a focus on tracing and identifying illegal assets, ensuring operational independence and high expertise. The ARO is a specialized unit, facilitating the process of tracing and identification, as well as international cooperation in the framework of asset recovery and in accordance with EU standards for asset recovery.

The above measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 2.2.1. The approval of the law on the Asset Recovery Office and ensuring alignment with the *EU acquis* in the field, as well as the sub-legal act implementing it, Instruction no. 203, dated 27.11.2025, “On defining the rules and procedures for the selection of the candidate for director of the Asset Recovery Office”; the sub-legal framework in the criminal field has been approved, including: CoMD no. 231, dated 17.4.2025, on the approval of Priority Recommendations in the Fight Against Crime for the year 2025, a document which constitutes an important guiding instrument for the responsible institutions in this field; Order no. 27061, dated 4.08.2025, the Head of the Special Prosecution Office has approved the “Strategy for reducing the number of pending cases 2025-2027”, which aims to increase the efficiency of investigations and improve case management; and the General Instruction no. 1093, dated 11.11.2024, approved by the Head of the Special Prosecution Office, where administrative and procedural measures have been defined for conducting financial and asset investigation by SPAK. As a result, based on the administered data, this performance indicator has been achieved at 100%.

Presentation of the realization of the indicator according to the Indicator Passport is as follows:

|                        |                                    |   |
|------------------------|------------------------------------|---|
| <b>Baseline values</b> | 2023                               |   |
|                        | N/A                                |   |
|                        | 2024                               | Preparation of assessment                                   |
|                        | 2025                               | Laws and sub-legal acts planned to be approved and approved |
|                        | 2026                               | Laws and sub-legal acts planned to be approved and approved |
|                        | 2027                               | Laws and sub-legal acts planned to be approved and approved |
|                        | 2028                               | Laws and sub-legal acts planned to be approved and approved |
|                        | 2029                               | Laws and sub-legal acts planned to be approved and approved |
|                        | 2030                               | Laws and sub-legal acts planned to be approved and approved |
|                        | <b>Target value/</b>               | <b>year 2025 (target)</b>                                   |
| <b>Target</b>          | <b>year 2025 (achieved target)</b> | <b>100%</b>   |

2.2.2: Ratio of completed criminal investigations for corruption from ongoing investigations (reduction of backlog) (increasing trend).

The target value for *performance indicator 2.2.2* for the year 2025 is: Increasing trend of completed criminal investigations for corruption (*reduced backlog*).

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024-2026 action plan, activities (16) and measures (3) have been foreseen as follows.

|         |   |
|---------|---|
| 2.2.2   | Strengthening of the institutional framework and professional capacities of law enforcement bodies and their staff, with a focus on investigation and prosecution of corruption   |
| 2.2.2.1 | Consolidation and continuous improvement of the technical-professional resources of the economic crime and money laundering sections in the central structure of the General Directorate of State Police as well as in the local directorates of the State Police   |
| 2.2.2.2 | Identification of needs for technical knowledge (trainings) for staff and professionals of investigation and prosecution bodies (prosecutor's offices) and adjudication bodies (judiciary) (Report on training requests, approved) / annual   |
| 2.2.2.3 | Continuous/annual training of police officers on proactive investigations, for criminal offenses in the field of corruption, economic and financial crimes, money laundering and criminal assets (training conducted)   |
| 2.2.2.4 | pecialized trainings with inter-institutional participation (law enforcement agencies and judiciary) to ensure proactive activity on financial investigation, prosecution and adjudication of corruption in topics such as: public procurement, public-private partnership, concessions, beneficial ownership, money laundering, etc. |
| 2.2.3   | Consolidation of the sustainable structures of law enforcement agencies to ensure proactive investigations against corruption (performance improvement)   |

|         |   |
|---------|---|
| 2.2.3.1 | Identification of the needs for technical expertise for the staff and professionals of law enforcement bodies and prosecution authorities (prosecutor's offices) and the judiciary (courts) (Approved Plan for expertise and performance increase) (annual)   |
| 2.2.3.2 | Consolidation and continuous strengthening of the economic crime and money laundering sections within the central structure at the General Directorate of State Police as well as in the local directorates of the State Police (human and technical-professional resources trained and efficient)  |
| 2.2.3.3 | Planning of mechanisms for the establishment of the digital infrastructure for the case management system of SPAK, by outlining the steps of its establishment within 2024 (I); establishment and testing within 2025 (II); use of the system within 2026 (III). (in relevance with the provision of chapter II: fight against corruption, part 3 (criminal investigation and punishment) of the Rule of Law Roadmap)<br><br>(Note: this activity is in full implementation relevance with the provisions made in the IJS AP). (Note: this activity is in full implementation relevance with the provisions made in the IJS AP) |
| 2.2.3.4 | Increase of SPAK investigative expertise by enabling the necessary access to state databases in use (databases taken into use)  |
| 2.2.3.5 | Strengthening of SPAK investigative capacities in the use of state databases taken into use (trainings and increased knowledge on them)   |
| 2.2.3.6 | Establishment of the preventive interception section in function of the intelligence activity, risk assessment unit and international cooperation within NBI  |
| 2.2.3.7 | Establishment and organization of the Asset Recovery Office (ARO) at the State Police   |
| 2.2.3.8 | Organization and full operation of the units (internal institutional structures) that will cooperate with the ARO, in the MoJ and within the prosecution offices  |
| 2.2.4   | Increase of performance of law enforcement agencies for criminal investigation of corruption through institutional cooperation, communication with the public and management of statistical information   |
| 2.2.4.1 | Strengthening of the proactive approach in detecting corruption by using media reports, analysis of audit reports, findings of inspections and cooperation with anti-corruption coordinators (cases of investigations initiated ex officio)   |
| 2.2.4.2 | Actions in the detection of corruption, based on asset declarations and their verification  |
| 2.2.4.3 | Consolidation of statistical data on corruption offenses through the continuous use of the e-platform   |
| 2.2.4.4 | Drafting of typologies and indicators for corruption cases identified by institutions during the handling of cases according to the respective fields of responsibility   |

The implementation of the planned measures is carried out through the activities foreseen throughout the period and in continuation of the implementation of the action plan. Measurement and progress will be conducted on a 6-month and annual basis.

*During January–December 2025*, the structures for the investigation of economic and financial crime in the State Police have not undergone any changes or interventions and continue to operate with the technical-professional capacities declared in the previous year (part of the Directorate for the Investigation of Economic and Financial Crimes is the Section for the Investigation of Money

Laundering and Criminal Assets, with a total of 8 employees. A separate section of it, for asset recovery, continues to exist only in the LPD Tirana.

The School of Magistrates has prepared a report on the needs for strengthening the capacities of technical experts and professionals dealing with criminal investigation and prosecution, based on which training sessions are planned and provided for the subjects (judges and prosecutors) who conduct and exercise criminal investigation.

Regarding the continuous/annual training of State Police officers on proactive investigations for criminal offences in the field of corruption, economic and financial crimes, money laundering and criminal assets, during 2025 the provision of sessions for strengthening institutional and human capacities has continued, with the aim of maintaining the consistency of the Directorate for the Investigation of Economic and Financial Crimes with the Money Laundering and Criminal Assets Investigation sector (for its 8 employees). The structures of this directorate have participated in 32 trainings, from which a total of 458 police officers have benefited. Compared to the same period of 2024, the training dynamics during 2025 show a significant increase, specifically 25 more trainings have been conducted and 398 more police officers have benefited, reflecting the strengthening of professional and technical capacities in the investigation of economic crime and money laundering.

Also, in 2025, staff and employees of the SP have participated in 14 trainings of direct interest for money laundering investigations, with 341 beneficiaries from the structures conducting asset investigations. Among the trainings in which specialists of the Money Laundering and Criminal Assets Investigation Sector have participated are the following sessions: “Strengthening asset recovery efforts in the OSCE region”, on 28–29 January 2025, 3 beneficiaries, including 2 from the Money Laundering sector, provided by OSCE; “The evaluation process of the 6th round of evaluation by the MONEYVAL Committee”, 11–12 March 2025, at the Palace of Congresses, provided by FIA, with 4 beneficiaries from State Police structures (all from DHKEF) and with the participation of all national institutions involved in this assessment; “On the use of the Police Information Management System”, on the dates 25-26 March 2025, in the premises of the Security Academy, with 1 beneficiary from the GPO & CA structures, or 18 beneficiaries from the State Police; “Financial investigation”, provided by EU4FAST, developed in Tirana, on the date 20-22 May 2025, with 20 beneficiaries from the structures dealing with Money Laundering; Workshop on the date 27 May 2025, in Tirana, on Chapter 4, with the participation of contact points (2 contact points); “Innovative program for capacity development, teamwork and creation of social impact”, organized by AASCA in cooperation with UNICEF, developed in Tirana, on the dates 16-18 June 2025, with 4 beneficiaries; “Sectoral analysis in the field of financial crimes”, provided by OSCE, developed in the premises of GDoSP, on the dates 17-19 June 2025, with 11 beneficiaries (8 from DHKEF and 3 beneficiaries from the Anti-Terror Directorate); “Investigation of money laundering through cryptocurrencies”, provided by OSCE in cooperation with the Liaison Office of the Italian Police and the Office of the Regional Manager of Guardia di Finanza for the South-West Balkans at the Italian Embassy, in Tirana, developed at “Mak Albania”, in Tirana, on 23-24 June 2025, with inter-institutional participation, with 7 beneficiaries (4 DHKEF and 3 Cyber Directorate); “Increasing the safety of journalists”, provided by the Council of Europe, in the premises of hotel “Moxart”, in Shkodër, on the dates 25-26 June 2025, with 1 beneficiary from DPK; “Darknet and cryptocurrencies applied in Money Laundering and financing of terrorism”, organized by the EU4LEA2 Project, developed in Tirana, on the dates 7-8 July 2025, with 4 beneficiaries from these

2 persons from the GPO sector; “Darknet and cryptocurrencies applied in Money Laundering and financing of terrorism”, organized by the EU4LEA2 Project, developed in Tirana, on the dates 9-10 July 2025, with 20 beneficiaries from the central and local structures of GPO; “Asset Recovery”, provided by UNODC, developed in Tirana, on the dates 22-23 July 2025, with 6 beneficiaries (1 of them from the GPO Sector); “Economic and financial strategies to target criminal assets to reduce organized crime”, provided by Guardia di Finanza in cooperation with the Financial School of the Police in Ostia Italy, 19 participants; “International policies to combat money laundering and financing of terrorism”, provided by Guardia di Finanza in cooperation with the Financial School of the Police in Ostia Italy, 19 participants; “Global Tax and Crime Project – Basic training”, provided by Guardia di Finanza in cooperation with the Financial School of the Police in Ostia Italy, 22 participants; “Planning for effective asset management: to be considered before seizure”, provided by the Regional Program EU4FATS, in cooperation with the Interinstitutional Network for Asset Management in the Balkans (BAMIN), 1 participant, 24-25 September 2025; “On money laundering, the fight against corruption and strengthening international cooperation”, developed on the dates 29-30 October 2025, provided by OSCE, 2 beneficiaries; “Interpol Cooperation Against Ndragheta (I-CAN), organized by the General Secretariat of Interpol, on the dates 18-19 November 2025, in Lyon, France, with 2 participants; “Advanced financial analysis for the National Bureau of Investigation and the State Police”, organized by PSBE, on the dates 17-21 November 2025, in the premises of GDoSP, with 5 participants and “Prevention of money laundering and financing of terrorism”, provided by the Turkish Police, on the dates 15-19 December 2025, at the Security Academy, Tirana, with 20 beneficiaries.

Additionally, from the School of Magistrates, among the organized sessions we mention, those<sup>61</sup>: (1) on the implementation of the Jurisprudence of the ECHR on issues of corruption, money laundering and financing of terrorism”<sup>62</sup>, attended by 74 persons. (2) corruption module on “Legal provisions related to the criminal offense of corruption. History of the legal regulation and legal changes over the years. International provisions on corruption and the implementation of binding Conventions. Criminal offenses of corruption in the Criminal Code”<sup>63</sup>, attended by 20 persons. (3) corruption module on “Individualization of the figures of the criminal offense of corruption. Typification of active corruption, mediation for corruption and corruption. Determination of the criminal liability of the corrupt intermediary. Scope of application of article 245/1 in relation to the special figures of criminal offenses of corruption. Investigative actions and special means of searching for evidence in criminal offenses of corruption”<sup>64</sup>, attended by 19 persons. (4) corruption module on “Understanding and implementation of cooperation in cases of corruption. Judicial practice. Corruption and cooperation with organized crime”<sup>65</sup>, attended by 13 persons. (5) corruption module on “Corruption, abuse of duty, violation of equality in procurements, sexual or homosexual relations by abusing duty, the dividing limits and differences of these criminal offenses. Subject-matter competence of the prosecution and the court for the investigation, trial and execution of criminal sentences of corruption”<sup>66</sup>, attended by 27 persons. (6) corruption module on “Corruption, supplementary punishments and their execution. Property proceeding for criminal

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<sup>61</sup> 310 beneficiary participants.

<sup>62</sup> 24 – 25 February 2025.

<sup>63</sup> 10 March 2025.

<sup>64</sup> 11 March 2025

<sup>65</sup> 17 March 2025.

<sup>66</sup> 18 March 2025.

offenses of corruption”<sup>67</sup> attended by 3 persons. (7) Training with the topic: “Violation of the principle of equal treatment in public procurement procedures as a criminal offense organized in cooperation with OSCE, attended by 34 persons. (8) Module “Money Laundering”, training with the topic “Criminal offenses in the field of taxes and fiscal evasion. Money laundering, international obligations in the fight against money laundering and financing of terrorism. The concept of recovery of the proceeds of the criminal offense”<sup>68</sup>, attended by 25 persons, (9) Module “Money Laundering”, training with the topic “Figures of the criminal offense of laundering the proceeds of the criminal offense provided in article 287 of the Criminal Code. Comparative overview with analogous provisions of other countries. Cases of judicial practice”<sup>69</sup>, attended by 19 persons. (10) Module “Money Laundering”, training with the topic “Investigation of the criminal offense of money laundering and its complexity. The level of evidentiary proof before the court regarding the origin of the property. The value of the act of accounting expertise and the care that must be shown in assigning the tasks of the expert” organized in cooperation with OSCE, attended by 46 persons. (11) Module “Money laundering, training with the topic: “Anti-mafia law. Its implementation in practice and the link between property investigation and criminal proceeding of money laundering”<sup>70</sup>, organized in cooperation with OSCE, attended by 28 persons. (12) Corruption module on “Corruption and public procurement; Parties that may be involved in active or passive corrupt actions and methods for investigation and trial in these cases”<sup>71</sup> attended by 17 persons. (13) Module “Money laundering, with the topic “International provisions related to the confiscation of the proceeds of the criminal offense. The importance of confiscation in the fight against money laundering. International assistance available against money laundering and financing of terrorism”<sup>72</sup>, attended by 18 persons. (14) Corruption module on “Corruption of high state officials or local elected officials”<sup>73</sup>, attended by 9 persons. (15) Corruption module on “The global and European framework for the fight against corruption”<sup>74</sup>, attended by 32 persons. Referring to participation in increased and continuous trainings in the field specifically for officers of police structures for this period, a total of 15 seminars, trainings and workshops have been developed, with participation of 112 employees (79 males and 35 females). Also mentioned is the participation in: the Asset Recovery Project with the region, by 4 employees and, Parallel financial investigation with the criminal investigation of criminal offenses that generate criminal income, by 71 employees. Two specialized trainings with the topic “Pro-active financial investigation of complex cases of money laundering”<sup>75,76</sup>”, where the first training, developed on 14 November 2025, was attended by 21 judges, 40 prosecutors and 18 judicial police officers, while the second training, developed on 15 December 2025, was attended by 4 judges, 23 prosecutors, 21 judicial police officers and 2 investigators of the NBI, reflecting an integrated inter-institutional approach in addressing complex financial issues.

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<sup>67</sup> 3 March 2025.

<sup>68</sup> 12 May 2025.

<sup>69</sup> 13 May 2025.

<sup>70</sup> 20 May 2025.

<sup>71</sup> 23 May 2025.

<sup>72</sup> 26 May 2025.

<sup>73</sup> 11 June 2025.

<sup>74</sup> 20 June 2025.

<sup>75</sup> 14 November 2025

<sup>76</sup> 15 December 2025

In parallel, SPAK reports that during 2025, only in the field of financial investigation, special prosecutors, investigators of the NBI and financial investigators have participated in 16 specialized trainings, organized by domestic and foreign law enforcement agencies, with a focus on increasing investigative capacities and strengthening professional cooperation in the treatment of criminal offenses of corruption and money laundering.

At the Special Court of First Instance for Corruption and Organized Crime (SCCOC), during 2025 specialized training activities have been developed, where among them are mentioned as follows: (1) Specialized training on “Investigation and prosecution of crimes related to crypto assets”<sup>77</sup>, attended by the judicial body of the SCCOC, organized by the Western Balkans Criminal Justice Project (WBCJ), in cooperation with the European Judicial Cybercrime Network (EJCN), with a focus on the investigation and criminal treatment of offenses involving cryptocurrencies and digital assets; (2) Further participation of some SCCOC judges in specialized trainings on cryptocurrencies, developed inside and outside the country, including trainings in the Czech Republic, with the aim of increasing expertise in handling complex issues related to contemporary financial technologies; (3) Training with the topic “Public Procurement”<sup>78</sup>, attended by the managerial and administrative staff of the SCCOC (the Chancellor, the Head of the Human Resources Sector, Public and Media Relations, the Head of the Support Services and Procurement Sector, the Head of the Protocol/Archive Sector, the Head of the Budget and Financial Management Sector, as well as the IT Specialist), organized by the Albanian School of Public Administration; (4) Training on law no. 9901/2008, “On traders and commercial companies”, as amended<sup>79</sup>, attended by the Statistics Specialist and the Procurement Specialist, organized by PKF Albania SHPK, with a focus on strengthening knowledge in the field of commercial legislation and its implementation in practice.

Regarding the identification of needs for technical expertise for the staff and professionals of the bodies of investigation, prosecution and adjudication, sustainable measures have been undertaken to increase the quality of expertise and professional performance. More specifically, the School of Magistrates, in cooperation with the Governing Council, has continued a structured and rigorous process for the selection of experts and facilitators, focusing mainly on magistrates in office, as well as on other qualified professionals with academic experience and certified pedagogical skills. The experts have been subjected to a continuous evaluation process, which has included seriousness in fulfilling commitments, the quality of training materials, interaction with the audience and anonymous evaluations of participants at the end of each activity. In April 2025, the School of Magistrates has also announced the call for expression of interest for experts and facilitators for the academic year 2025–2026, in implementation of the 3-year thematic program 2024–2027, where a high interest has been evidenced from magistrates and legal professionals for specialized topics and modules.

In parallel, the General Prosecution has continued strengthening internal capacities through the functioning of 7 special sections at the prosecution offices of general jurisdiction, dedicated to the investigation of criminal offenses related to corruption, financial crime and property investigations. In prosecution offices with more limited human capacities, dedicated prosecutors have been

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<sup>77</sup> 05–06 November 2025

<sup>78</sup> 01–07 April 2025

<sup>79</sup> 20 November 2025

assigned for these categories of offenses. In support of financial and property expertise, by Order no. 111, dated 5.11.2025, in the General Prosecution an accounting expert has been appointed in the function of Head of the Expertise Sector. During 2025, the General Prosecution has also continued to ensure additional funds for conducting financial expertise in first instance prosecution offices, guaranteeing effective support for handling complex criminal cases.

The sections of economic crime and money laundering in the central structure at the General Directorate of the State Police as well as in the local directorates of the State Police have not undergone interventions and changes for the year 2025, functioning with the same capacities.

Regarding the planning and establishment of the digital infrastructure for the case management system of SPAK, the implementation of the second phase of this process has continued, in accordance with the provisions of the Rule of Law Roadmap and the Action Plan of the IJS. More specifically, the piloting of the Case Management System started in January 2025, marking the transition from the planning phase to the implementation and testing phase. During the year, the completed modules have been populated with functional data, while work has continued for the development of new modules and the improvement of existing ones. In this framework, during 2025 the module of referrals and property proceedings has been completed, as well as the statistics module, built in accordance with the official reporting format for criminal reports and the register of criminal proceedings. These modules have aimed at increasing standardization, traceability and efficiency in the administration of complex criminal cases.

Progress has been noted in increasing the investigative expertise of SPAK with 31% of acts under expertise in the laboratories of the NBI and with in-depth digital analyses. Also, through the expansion of access to state databases. More specifically, in 2025 access to two additional state data databases has been secured, bringing the total number of databases in use to 22 accesses, including 3 new systems, improving the speed, security and efficiency of investigative processes<sup>80</sup>. This development has contributed to improving the analytical and verification capacities of investigative structures, especially in complex financial and property investigations as well as providing full assistance for their use by prosecutors and judicial police JPO. In this framework, dedicated trainings have been carried out for users, as well as continuous technical assistance for the identification and real-time addressing of operational issues, with the aim of ensuring continuity and efficiency of institutional work in the use of information systems.

In the NBI the preventive interception section has been established<sup>81</sup> while the risk assessment unit and international cooperation unit remain in the process of organization for establishment. Within the framework of activities 2.2.3.7 and 2.2.3.8 significant progress has been noted in the establishment and organization of the Asset Recovery Office at the State Police. Following the structural changes undertaken in 2023 in the State Police, within the Directorate for the Investigation of Economic and Financial Crimes, the functioning of the Financial Analysis Sector

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<sup>80</sup> Annual Report 2025 of SPAK, page 8, at link: [https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025\\_SPAK.pdf](https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025_SPAK.pdf).

<sup>81</sup> Annual Report 2025 of SPAK, page 100, at link: [https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025\\_SPAK.pdf](https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025_SPAK.pdf).

and the ARO has continued, which exercises the functions provided in the legal framework for the identification, tracing and recovery of assets of criminal origin. With the approval of Law no. 44/2025 “On the Asset Recovery Office”, which entered into force on 25 July 2025, the legal basis has been established for the organization of the ARO at the level of a directorate, under the dependency of the General Director of the State Police. This law constitutes a key instrument in the fight against money laundering and the recovery of proceeds of criminal activity, in accordance with the standards of the European Union. The Financial Analysis Sector and ARO have continued to administer and process requests for exchange of information from homologous Asset Recovery Offices of EU countries, the CARIN network, as well as from Europol and Interpol, in function of tracing, identifying and recovering criminal assets. In parallel, the staff has participated in trainings and workshops at regional and international level, organized with the support of partners, including the Council of Europe, UNODC and the British Embassy. In implementation of the new law, during 2025 by-laws have been approved for the functioning of the ARO, including standard operating procedures for asset recovery and information exchange at national and international level, official electronic communication formats, as well as job descriptions for the respective structures. Regarding the structure and organization, with the approval of the structure of the Asset Recovery Directorate, its organization has been foreseen with a directorate, two functional sectors (Internal and External Communication; Analysis and Statistics) and the respective specialists. During 2025 the competition procedure for the selection of the Director of the Asset Recovery Directorate has been completed, as well as the heads of the two main sectors have been appointed, while the further staffing with specialists is in process. In accordance with Law no. 44/2025, the Director of the Asset Recovery Directorate is also designated as the contact point for coordination of assistance and cooperation with the Council of Europe and other international partners in the field of asset recovery. In implementation of article 14 of Law no. 44/2025 “On the Asset Recovery Office”, the Director of the ARO has the legal obligation to request from law enforcement institutions, including the general jurisdiction prosecution offices, the designation of contact points for cooperation and information exchange in the field of asset recovery.

Law enforcement institutions have continued strengthening the proactive approach in the detection and investigation of corruption, through the systematic use of information obtained from open sources, audit reports, inspection findings, public complaints and inter-institutional cooperation.

In this framework, the Special Prosecution Office has registered a total of 294 new criminal proceedings, of which 109 proceedings were initiated ex officio by special prosecutors, reflecting an increased proactive approach. 139 criminal proceedings have been registered on the basis of referrals from judicial police services, complaints from domestic institutions and foreign authorities, private entities and citizens, while 46 proceedings have been registered on the basis of cases referred for competence from the general jurisdiction prosecution offices. Also, improvements have been noted in referrals received from the State Police with around 70% and from other public authorities with around 15%.

Meanwhile, the General Prosecution has continued strengthening transparency and communication with the public and the media, in implementation of the regulatory framework in force. During 2025, 201 press releases have been published and 58 requests for information have been handled, contributing to increasing public trust and encouraging citizen participation in reporting acts of corruption, in accordance with legal and ethical standards. The notifications have been published

on the main page and in the prosecution offices of general jurisdiction in the respective districts in Albanian and English language. The information is also shared on the social network X.

The Police Oversight Agency has continued procedural investigative activity in close cooperation with the prosecution offices, significantly contributing to the documentation and combating of unlawful activity of police officers and supervisory structures. During 2025, 336 criminal referrals for 444 subjects have been referred to the prosecution body, including police officers of managerial and operational levels, civil employees and citizens<sup>82</sup>. In addition, 133 security measures have been implemented, including detentions and arrests in flagrante delicto, as well as other coercive measures, in function of strengthening accountability and legality. The analysis of the cases handled shows that abuse of office and passive corruption remain the most frequent forms of illegality, accounting for around 30% of the total criminal referrals, followed by facilitation of illegality, arbitrary actions and other criminal violations.

In the capacity and fulfillment of the attributes of the Judicial Police Officer by the staff of the PSA, arrests/detentions in flagrante delicto conditions have been carried out on initiative as well as the execution of court decisions for security measures of a prohibitive and coercive nature, 133 measures, including against 115 police structure employees and 18 citizens<sup>83</sup>.

The classical form of illegalities, carried out either as a single form or combined with other legal violations, expressed in %, processed by PSA is: *Abuse of office & passive corruption* 30% of the total criminal referrals, *Abuse of office & facilitation of illegality* 22% of the total criminal referrals, *Execution of arbitrary actions* 13% of the total criminal referrals, *Intentional damage, threats, mistreatment, etc.* 19% of the total criminal referrals and *Violation of traffic rules* 16% of the total criminal referrals.

In the administrative aspect, PSA has intensified the handling of complaints and the conduct of planned and unplanned inspections, focusing not only on quantity, but also on the quality of findings and recommendations. During the year, 1677 complaints have been handled from various communication channels and 40 inspections have been carried out, with recommendations for the initiation of disciplinary investigations against a considerable number of police officers, mainly for serious and minor disciplinary violations. The mechanisms used by PSA are mentioned: The green line 0800 90 90 with 3846 calls. Complaints received from all communication channels 1677 complaints, specifically: 513 complaints via the email address [ankesa@amp.gov.al](mailto:ankesa@amp.gov.al), 331 complaints

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<sup>82</sup> 95 police officers of first-level managerial positions, 330 police officers of operational level, 9 civil (administrative) employees, 9 members of the Guard, 1 employee of the FPRP, and 62 citizens,

<sup>83</sup> Arrested/detained in flagrante delicto 70 persons (9 first-level managerial police officers, 45 operational level police officers, 1 administrative employee, 4 members of the Guard, 1 member of the FPRP, and 10 citizens). The personal security measure “*arrest in prison*” was imposed for 6 persons (4 first-level managerial police officers, 1 operational level police officer and 1 member of the Guard). The personal security measure “*house arrest*” was imposed for 4 persons (1 first-level managerial police officer and 3 operational level police officers). The personal security measure “*suspension from exercising a duty or public service*” was imposed for 41 persons (12 first-level managerial police officers, 24 operational level police officers, 2 administrative employees and 3 employees of NITP (citizens)). The personal security measure “*obligation to appear before the judicial police*” was imposed for 11 persons (5 operational level police officers, 1 administrative employee and 5 citizens). The personal security measure “*prohibition of leaving the country*” was imposed for 1 administrative employee.

via official mail, 252 complaints at the Regional Directorates of the Agency, 241 complaints at the Complaints Office of the PSA, 134 complaints through the Reporting System (Digital Agency), 126 complaints from other administration institutions, 71 complaints from the Gov Portal, 5 complaints from social networks/media and 4 complaints from the Ombudsman. There are 18 planned inspections carried out and 22 unplanned inspections, carried out.

The State Police, through the Directorate for the Investigation of Economic and Financial Crimes, has contributed to increasing public and media awareness for the denunciation of corruption. During 2025, 72 criminal complaints have been identified and referred to the prosecution for offenses related to corruption and abuse of office, including complaints based on media investigations, which have led to the registration of respective criminal proceedings.

Regarding the implementation of activity 2.2.4.2, the HIDAACI has taken 75 administrative fine measures and has proceeded in total with 16 criminal referrals or other referrals.

It has continued with the consolidation of statistical data for criminal offenses of corruption and organized crime through the continuous use of the *E-Platform for Data Collection of the Enlargement Countries' Criminal Track Records (e-tracking)*, under the coordination of the Ministry of Justice. The platform has been updated regularly and periodically by the contact points of the justice system institutions, in accordance with the approved procedures and the inter-institutional cooperation mechanism, ensuring the accuracy, coherence and consolidation of statistical information. Currently, in the platform have been uploaded and consolidated the data for the year 2025, which serve as a basis for analysis, reporting and monitoring of the respective indicator.

In this process, the General Prosecution, in the role of coordinator and monitor, together with the first instance prosecution offices of general jurisdiction as primary users of the platform, has been maximally engaged throughout the year 2025, both in the uploading and periodic reporting of data for corruption and organized crime. This engagement has been supported by the continuous coordination of work with the National Coordinator in the Ministry of Justice, as well as with the respective services of the European Commission, in function of the proper functioning of the reporting process.

In function of guaranteeing a unified and quality reporting, the implementation of the Instruction of the Prosecutor General no. 3, dated 25.04.2024, "On the use of the electronic platform for reporting data on corruption and organized crime", has continued, which has defined clear administrative and procedural obligations for the heads of the prosecution offices with general jurisdiction, regarding the accurate, complete and periodic uploading of data.

In the e-platform have been uploaded the data for the year 2025 for corruption group offenses, referring to the list of articles agreed with the European Commission, including among others the criminal offenses provided in articles 135, 244, 245/1, 248, 256, 259, 164 and 164/a of the Criminal Code. According to the consolidated statistical data, for the year 2025 there have been registered 699 criminal proceedings for corruption offenses and those related to duty, with 163 defendants, while 212 criminal proceedings with 421 defendants have been sent for trial. Compared to the year 2024, this represents an increase of 14.60% of the proceedings sent for trial and an increase of

59.47% of the number of defendants sent for trial, reflecting the strengthening of reporting, prosecution and statistical transparency.

As regards the judicial system, the E-platform is not applied to the Special Court of First Instance for Corruption and Organized Crime (SCCOC), due to the specifics of its functioning.

Within the framework of awareness-raising and training on issues of prevention of money laundering and financing of terrorism, the Financial Intelligence Agency has completed the drafting of a summary document of indicators, indicators and typologies related to criminal offenses of corruption, identified during the handling of cases by the respective institutions according to their fields of responsibility. The document aims to serve as a practical guiding instrument for the identification and analysis of corruption risk, especially in interaction with money laundering. In the drafting process, the document has been consulted with HIDAACI, with the aim of ensuring inter-institutional coherence and reflecting existing practices in the field of prevention and detection of corruption. After finalization, the document has been distributed to law enforcement bodies and supervisory institutions, in accordance with the field of activity of each, including the Special Prosecution Office Against Corruption and Organized Crime, the General Prosecution, the State Police, as well as supervisory authorities such as the Bank of Albania and the Financial Supervisory Authority. At the same time, the document has been placed on the electronic platform of the FIA, dedicated to reporting entities, with the aim of serving as a continuous reference for increasing awareness, improving the quality of reporting and strengthening analytical capacities in identifying suspected cases of corruption.

As above, the measures and activities foreseen for the year 2025 have directly influenced the target value of performance indicator 2.2.2. The data administered by the Special Prosecution Office and the General Prosecution show as follows:

- The Prosecution Offices of General Jurisdiction have completed 148 cases for criminal groups of corruption offenses.
- The Special Prosecution Office has completed 127 cases for criminal groups of corruption offenses.

More specifically for the values of the performance indicator it results that:

- The Special Prosecution Office has carried over for investigation 389 cases in the previous year, 2026, reflecting an increasing trend of the stock of cases (*backlog*) for criminal offenses related to corruption.<sup>84</sup>
- The General Prosecution has carried over (*backlog*) for investigation 113 cases in the previous year, 2026, but always within the procedural investigation deadlines provided by the Criminal Procedure Code.

In the analysis of the consolidated data from both institutions, a slight increase in the stock (*backlog*) of cases is observed compared to the preceding year, which has affected the non-achievement of the performance indicator. It is noted that this indicator is measured in aggregation and sum of statistical data received from both prosecution offices in relevance to their procedural

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<sup>84</sup> Page 40 [https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025\\_SPAK.pdf](https://spak.gov.al/wp-content/uploads/2026/03/Raporti-vjetor-2025_SPAK.pdf)

competencies, according to the criminal legislation in force. As a result, based on the administered data, this performance indicator and in implementation of the measurement formula, it results that this indicator has been achieved only at the level of 55%.

The presentation of the achievement of the indicator according to the Indicator Passport is presented as follows:

|                            |                                    |  |
|----------------------------|------------------------------------|--|
| <b>Base Values</b>         | 2023                               |  |
|                            | N/A                                |  |
|                            | 2024                               | Preparation of the assessment  |
|                            | 2025                               | Increasing trend of completion of criminal investigations for corruption (reduced <i>backlog</i> ) |
|                            | 2026                               | Increasing trend of completion of criminal investigations for corruption (reduced <i>backlog</i> ) |
|                            | 2027                               | Increasing trend of completion of criminal investigations for corruption (reduced <i>backlog</i> ) |
|                            | 2028                               | Increasing trend of completion of criminal investigations for corruption (reduced <i>backlog</i> ) |
|                            | 2029                               | No <i>backlog</i>  |
|                            | 2030                               | No <i>backlog</i>  |
| <b>Target value/Target</b> | <b>year 2025 (target)</b>          | Increasing trend of completion of criminal investigations for corruption (reduced <i>backlog</i> ) |
|                            | <b>year 2025 (achieved target)</b> | <b>55%</b>   |

2.2.3: *The percentage of the value of seized assets as a result of the investigation of corruption cases from the average value of seized assets in the last three years (increasing trend).*

The target value for *performance indicator 2.2.3* for the year 2025 is: Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases.

The action plan for Objective 2.2, in the period January–December 2025 does not provide for specific measures and activities for implementation, since the values of the performance indicator refer to the values of seized assets after court decision(s) of final form have been administered.

As above, based on the data administered by AASCA, it results that for the target value of performance indicator 2.2.3, the value of seized assets is for 726 assets with a value of 6,043,627,188.04 ALL and from these for criminal offenses of corruption are for 30 assets against the value of 693,553,42.00 ALL (1.15%)

Data referring to the previous year, 2024, it results that seized assets have been 554 with a value of 2,263,838,910.21 ALL and from these for criminal offenses of corruption, are 12 assets with a value of 90,193,500.00 ALL (8.76%).

As a result, based on the data administered this performance indicator and in implementation of the measurement formula it results that this indicator has been achieved only at the level of 8%.

Presentation of the achievement of the indicator according to the Indicator Passport is as follows:

|                            |                                    |   |
|----------------------------|------------------------------------|---|
| <b>Base Values</b>         | 2023                               |   |
|                            | N/A                                |   |
|                            | 2024                               | Preparation of the assessment   |
|                            | 2025                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | 2026                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | 2027                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | 2028                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | 2029                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | 2030                               | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
| <b>Target value/Target</b> | <b>year 2025 (target)</b>          | Increasing trend of the ratio between the value of assets seized in corruption compared to other criminal cases |
|                            | <b>year 2025 (achieved target)</b> | <b>8%</b>   |

### Level of achievement of objective 2.2

The level of achievement of Objective 2.2. *Strengthening capacities, resources and performance for effective criminal investigation and prosecution of corruption*, in relation to the achievement of performance indicators for the period January-December 2025 is **54.3%**.

The calculation has been carried out by measuring and evidencing the evaluation ratios performed, in accordance with the provision made in the list of performance indicators, annex 2 of the Inter-Sectorial Strategy against Corruption, 2024-2030.

The calculation has been carried out according to the following formula:

$$NR\ 2.2 = \frac{TP\ 2.2.1\ (100\%)+\ TP\ 2.2.2\ (55\%)+\ TP\ 2.2.3\ (8\%)}{3\ TP} \times 100\% = 54.3\%$$

### Data verifiability

The reported data on performance indicators are based on information reported by the responsible authorities such as the prosecution offices (Special and General) as well as AASCA, for monitoring the implementation of the action plan for January- December 2025.

## **Risk for the achievement of Objective 2.2**

For the year 2025, a high risk is presented in the realization of the specific objective due to the non-achievement of the target values of the indicators.

### ***2.3 Strengthening international cooperation of law enforcement agencies and judicial bodies in the fight against corruption, economic crime and money laundering***

For this objective 1 performance indicator has been defined:

*2.3.1: The ratio of the number of operations initiated by Europol and Interpol in the field of the fight against financial and economic crime in which Albania participates from the average number of these operations in the last three years (increasing trend)*

The action plan for Objective 2.3, in the period January-December 2025 foresees 4 activities and 3 measures.

The target value for *performance indicator 2.3.1* for the year 2025 is: Increasing trend in the number of international operations in which Albania has participated.

To achieve the values of the indicator in accordance with the performance indicator passport and specifically with the action plan 2024-2026, the activities (4) and measures (3) are foreseen as follows.

|         |   |
|---------|---|
| 2.3.1   | Improvement and identification of international cooperation of law enforcement bodies (of special jurisdiction and those of ordinary jurisdiction), for the investigation and sanctioning of corruption crime and crimes of economic nature |
| 2.3.1.1 | Cooperation agreements with foreign (international) authorities and data on their implementation (regional cooperation platform)  |
| 2.3.1.2 | Information exchanges in the framework of international cooperation, especially in mutual legal assistance to facilitate the exchange of information and evidence in cases of corruption and economic crime                                 |
| 2.3.2   | Establishment of international cooperation between Asset Recovery Offices for the tracing of information on property and assets derived from corruption crimes and crimes of economic nature  |
| 2.3.2.1 | Establishment and exchange of information between structures of AROs with the aim of recovering assets coming from criminal activity  |
| 2.3.3   | Capacity building, information exchange and joint activities in the framework of international cooperation in the field of the fight against corruption   |
| 2.3.3.1 | Strengthening cooperation and coordination of law enforcement agencies with Interpol and Europol (joint working tables; discussion forums; meetings and conferences)  |

The implementation of the foreseen measures is carried out through the activities foreseen for implementation during the period and which continue also during the following years of implementation of the action plan. Measurement and progress will be done on a 6-month and annual basis.

*During January – December 2025*, the State Police has significantly intensified international cooperation, signing a total of 25 international acts with foreign strategic authorities and partners, with the aim of strengthening operational, technical and institutional capacities, as well as increasing effectiveness in the fight against organized crime, corruption, drug trafficking, irregular migration and other criminal activities. More specifically, cooperation has been materialized through terms of reference, memorandums of understanding, administrative agreements and donation contracts, mainly with the United Kingdom, Germany, Italy, Kosovo, Sweden, Norway, the United States of America, Ukraine, as well as with the institutions of the European Union. These instruments have supported, among others, the equipping of the State Police with advanced technological tools (thermal drones, videoscopic systems, scanning equipment, operational transport means, laboratory equipment for scientific police), improvement of territorial and border control, as well as strengthening of investigative and analytical capacities. Special attention has been given to cooperation against drug trafficking, through specific agreements with Italian authorities and through police attachés at international partner structures, as well as support for police reform, increasing professionalism and respect for international human rights standards. In parallel, the State Police has been an active part in regional initiatives for training and capacity building, including the establishment of the Regional Association of Police Academies in South Eastern Europe (RAPAC SEE). In total, these acts constitute a consolidated basis of international cooperation, directly contributing to the increase of operational and preventive capacities of the State Police, in accordance with national strategic priorities and international commitments of Albania in the field of security and rule of law.

The agreements concluded are mentioned: 1) Cooperation Agreement to send foreign police forces as operational observers to the Federal Police in the case of UEFA EURO 2024 between the Headquarters of the German Federal Police and the Albanian State Police. The agreement is a continuation of the Joint Declaration of intent for police cooperation during the UEFA European Football Championship for men (UEFA EURO 2024™) between the Federal Ministry of the Interior and Community of the Federal Republic of Germany and the General Directorate of the Albanian State Police, signed and entered into force for the Albanian side on 27.03.2024. The agreement was signed by the German side on 01.06.2024 and signed and entered into force by the Albanian side on 07.06.2024. It ended on 24.06.2024-after the disqualification of the Albanian Team from UEFA 2024; 2) Memorandum of Understanding between the Ministry of Internal Affairs of the Republic of Albania, acting through the General Directorate of the Albanian State Police and the Secretary of State of the Home Department of the United Kingdom of Great Britain and Northern Ireland acting through the Foreign, Commonwealth and Development Office, represented by the British Embassy in Tirana on the Grant for the Establishment of the Joint Migration Task Force, signed in Tirana, in the second week of August 2024; 3) Agreement between the Council of Ministers of the Republic of Albania and the Government of the United Arab Emirates, on cooperation in the field of security and the fight against terrorism. Signed on 28.3.2022, in Dubai, United Arab Emirates. Entered into force on 22.08.2024; 4) Administrative Agreement between GDoSP and the Department of Public Security of Italy on technical activities of registration of migrants transported from Italy to Albania, signed on 04.09.2024, in Tirana; 5) Agreement between the Ministry of Internal Affairs of the Republic of Albania and the Ministry of Interior and Ministry of Justice of the Republic of Italy for the implementation of the Protocol between the Council of Ministers of the Republic of Albania and the Government of the Italian Republic, for strengthening cooperation in the field of migration dated 06.11.2023. Signed on our side in Tirana on 12.09.2024 and on the Italian side in Rome, on 19.09.2024; 6) Protocol between

the Ministry of Internal Affairs of the Republic of Albania and the Ministry of Internal Affairs of the Republic of Kosovo for the implementation of joint border control at the joint border crossing points Qafë Morinë (Tropojë, Gjakovë), Qafë Prush (Has, Gjakovë), Shishtavec Borje, Orgjost (Kukës, Krushevë), signed on 09.07.2024, at Qafë Morinë, Tropojë, Albania by the two Ministers of Internal Affairs of the two countries; 7) Protocol between the Ministry of Internal Affairs, the General Directorate of the State Police of the Republic of Albania and the Ministry of Internal Affairs, the Police Directorate of Montenegro, for cooperation during the summer tourist season, signed for the Albanian party on 18.07.2024 and signed for the Montenegrin party on 19.07.2024, on which date it entered into force, for an indefinite period; 8) Agreement between the Council of Ministers of the Republic of Albania and the Government of the United Arab Emirates, for cooperation in the field of security and the fight against terrorism. Signed on 28.3.2022, in Dubai, United Arab Emirates. Entered into force on 22.08.2024; 9) Agreement between the Council of Ministers of the Republic of Albania and the Republic of Moldova for police cooperation, signed in Moldova on 16.11.2023 and entered into force on 23 August 2024; 10) Terms of reference between the General Directorate of the State Police and the Secretariat for Internal Affairs of the Government of the United Kingdom of Great Britain and Northern Ireland acting through the Office of International Operations of the British Home Office for the Donation of DJI MAVIC 3 Thermal Drones (4 in total) implementation of additional measures for scanning and control of land territories for criminal activities. Nënshkruar më, datë 28.01.2025 në Tiranë; 11) Attachment Agreement between the Commissioner of the Metropolitan Police Service and the General Directorate of the Albanian State Police. Signed for the Albanian party on 31.01.2025. It has as object the attachment of Mr. Genci POSTOL to the Metropolitan Police Service for the period 01.03.2025 to 01.03.2026; 12) Terms of Reference between GDoSP and the Secretary of State for Internal Affairs of the United Kingdom and Northern Ireland acting through the Office of International Operations for the donation of the FLIR VS80 set – with videoscope probe 4.6mm, probe length 2 m, Resolution 640 x 480 pixels (3 in total) for the implementation of additional measures for scanning and control of the land territory for criminal activities. Signed in Tirana on 07.03.2025; 13) Handover Act between the German Federal Criminal Office represented by Ambassador Mr. Karlfried Bergner and the Albanian State Police represented by the General Director Mr. Ilir Proda, for the donation of a Skoda Kodiaq vehicle for the Witness Protection and Collaborators Directorate of the GDoSP. The handover of 2 Lenovo Legion 5 PRO 16IRX9 Gaming Notebook PCs, for the Institute of Forensic Police for Document and Photo Comparison within the framework of the EU-ISF “SCOPE” project. Signed in Tirana on 13.02.2025; 14) Memorandum of Cooperation between GDoSP and the General Directorate of Police of Kosovo for the organization of joint road policing services between the police of the two countries, in the territory of the Republic of Albania. Signed in Berat on 25.06.2025; 15) Protocol between the Ministry of Internal Affairs of the Republic of Albania and the Centre for Integrity in the Defence Sector (CIDS) of Norway. Assistance for the MoI from the CIDS centre- 1 January 2021 to 31 December 2025 (support period); 16) Memorandum of Understanding between the Department of State, the Bureau of Diplomatic Security and the State Police of Albania for the provision of additional investigative services, signed on 28.05.2025, in Tirana, entering into force on the date of signature and remaining in force without a time limit unless terminated by mutual written decision of the Participants or by one Participant; 17) Agreement between the Agency for the Administration of Seized and Confiscated Assets of the Republic of Albania and the National Agency of Ukraine for the identification, tracing and management of assets derived from corruption and other crimes. Signed and entered into force on 29.05.2025, in Ukraine; 18)

Administrative Agreement on the establishment of cooperation between the Council of Ministers of the Republic of Albania and the European Commission in the European Migration Network, signed on 24.06.2025, in Warsaw; 19) Terms of Reference between GDoSP and the Secretary of State for Internal Affairs of the United Kingdom and Northern Ireland acting through the Office of International Operations for the donation of 1 (one) “TOYOTA LAND CRUISER HV09” vehicle, implementation of additional measures for scanning and control of land territories for criminal activities as well as Pulsar Merger Duo NXP 50 Thermal Multispectral Binoculars (4 in total), for the detection of irregular migrants to and from the Republic of Albania. Signed in Tirana on 14.10.2025; 20) Terms of Reference between GDoSP and the Secretary of State for Internal Affairs of the United Kingdom and Northern Ireland acting through the Office of International Operations for the provision of LG ULTRAFINE 32UR500K screens (7 in total) for analysis, scanning and detection of criminal activities in the Republic of Albania. Signed in Tirana on 14.10.2025; 21) Terms of Reference between GDoSP and the Secretary of State for Internal Affairs of the United Kingdom and Northern Ireland acting through the Office of International Operations for the provision of support for the facilities of the DELTA Border and Migration Special Unit for the support of additional operations by improving the resilience of border operations for criminal activities. Signed in Tirana on 14.10.2025; 22) Donation Contract between the Federal Republic of Germany represented by the Ministry of Interior and Homeland, the latter represented by the Presidency of the German Federal Police and the General Directorate of the State Police of the Republic of Albania, signed on 27.10.2025, in Tirana. Its object is the donation of a cabinet for the use of cyanoacrylate vapours for the development of invisible papillary traces, with a value of 16,310.0 Euro, for the Institute of Forensic Police of GDoSP; 23) Memorandum of Understanding between GDoSP of the Ministry of Internal Affairs of the Republic of Albania and the Central Directorate for Anti-Drug Services of the Ministry of Internal Affairs of the Republic of Italy “Anti-Drug Mission”. Signed on 13.11.2025, in Rome. Its purpose is cooperation between the parties, providing each other with the necessary and permitted legal information, as well as technical and logistical support, based on operational needs, in the fight against drugs; 24) Memorandum of Understanding between the Albanian State Police and the Swedish Police with the object "Swedish support for police reform in Albania" and "Improving the ability and effectiveness of the Albanian Police to respect best international practices and human rights standards". Signed in Tirana on 18.09.2025; 25) Joint Declaration on the establishment of the Regional Association of Police Academies / Training Centres in South East Europe (RAPAC SEE). Signed in Skopje, North Macedonia, on 14.10.2025, by North Macedonia, Albania, Croatia, Kosovo, Greece, Slovenia, Montenegro and Moldova. Its purpose is the promotion of the development of non-binding common guidelines to support high-quality and effective joint training activities; the development of joint training programmes; the promotion of research and development; the support of exchange programmes; the development and/or advancement of the lifelong learning system for police staff and officers; the development of study visits for the exchange of curricula, teaching methodology and areas of cooperation.

The General Prosecution has concluded a Memorandum of Understanding with the Prosecution of Montenegro. This memorandum aims at strengthening cooperation between the institutions and improving services, and is based on the joint commitment to cooperation, respect for human rights, the rule of law and the fight against serious crime, money laundering, etc., for the citizens of both countries.

The Special Prosecution Office has signed a Memorandum of Understanding<sup>85</sup> with the Office of the Attorney General of the Republic of Ecuador, with the aim of increasing cooperation between the two parties in order to prevent and combat organized crime, in particular drug trafficking. The Special Prosecution Office has undertaken concrete steps to expand the network of cooperation with counterpart authorities abroad and on 3 December 2025, a series of Memoranda of Understanding were signed between the Special Prosecution Office and the Offices of the Attorneys General of several Latin American states, namely the Republic of Colombia, the Republic of Chile, the Federative Republic of Brazil, the Republic of Paraguay and the Dominican Republic. These memoranda aim at increasing and formalizing inter-institutional cooperation, particularly in the field of prevention and fight against transnational organized crime, with a special focus on narcotics trafficking, information exchange, mutual technical assistance and strengthening of investigative capacities. The signing of these instruments represents an important step in the consolidation of the proactive cooperation of the Special Prosecution Office with international strategic partners and in accordance with the standards of international judicial cooperation.

In 2025, the State Police has strengthened international operational cooperation in the function of investigating corruption and economic crime, through an expanded exchange of information with foreign partners. In total, 36,632 pieces of information have been exchanged, of which 23,493 through Interpol, 8,324 through Europol and 4,815 through Liaison Officers, via official channels such as Interpol Exchange, SIENA and SON. This exchange has included information, indications and evidence of international character, directly supporting criminal investigations and increasing the effectiveness of inter-institutional and cross-border cooperation.

The Special Prosecution Office has continued strengthening international cooperation through an intensive engagement in the field of international legal assistance, joint investigations, asset investigations and extradition procedures, in the function of investigating criminal offences of corruption, organized crime and terrorism. More specifically, the Sector for International Cooperation and Joint Investigations has handled 86 requests for mutual legal assistance received from foreign judicial authorities, based on Council of Europe conventions, United Nations conventions and bilateral agreements to which the Republic of Albania is a party. In parallel, for the needs of the investigations of the prosecutors of the Special Prosecution Office, 151 requests for legal assistance have been prepared and sent to foreign judicial authorities, mainly in European, regional countries and Latin America. In the same period, 3 criminal referrals have been transmitted from foreign authorities, while in the field of asset investigations, following requests for international legal assistance and in implementation of Law no. 10192, dated 3.12.2009, 4 referrals for asset investigations transmitted by Belgian authorities have been registered, which are currently under investigation. An important element of international cooperation during this period has also been the establishment of Joint Investigation Teams (JITs). 6 Joint Investigation Teams have been created, within which 16 coordination meetings have been held with foreign partner authorities, including joint meetings via videoconference. Furthermore, within the framework of inter-institutional cooperation for extradition procedures, the Special Prosecution Office has transmitted to the Ministry of Justice 43 extradition requests from abroad towards the Republic of Albania.

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<sup>85</sup> Signed on 27.03.2025.

In 2025, the institutional and operational foundations have been laid for the establishment and structured exchange of information between Asset Recovery Offices, with the aim of identifying, tracing and recovering assets of criminal origin. In accordance with Law no. 44/2025, the Director of the Asset Recovery Directorate has been designated as the contact point for following up and coordinating cooperation with the Council of Europe and international partners in the field of ARO. In operational terms, the official exchange of information between ARO structures is carried out through the SIENA channel, which ensures standardized, secure and traceable communication at European level. In parallel, the State Police continues to be an active part of the CARIN network, which serves as an informal cooperation mechanism for the rapid exchange of information related to the identification and recovery of criminal assets, thus complementing the formal framework of international cooperation.

During 2025, cooperation and coordination of Albanian law enforcement agencies with Interpol and Europol has been significantly strengthened, both at operational and strategic level. On the part of the State Police, during 2025, 5 international police operations have been carried out, in direct cooperation with Interpol, Europol and counterpart authorities. These operations have addressed priority areas such as: 1- environmental crimes and illegal trade in flora and fauna (Operation Thunder); 2- the fight against counterfeit pharmaceutical products and financial crime (Operation PANGEA XVII); 3- falsification of travel documents in cooperation with North Macedonia (Operation DVOJNIK); 4- financial cybercrimes and online money laundering (Operation HAECHI V – CEFIN Phase II); as well as 5- cryptocurrency fraud in cooperation with the Spanish Police (Operation PIPOL). These initiatives have contributed to increasing information exchange, joint investigations and the tackling of new forms of cross-border crime.

On the part of the Special Prosecution Office, the Sector for International Cooperation and Joint Investigations has continued to play the role of central liaison point with foreign authorities, in accordance with Law no. 95/2016. During 2025, cooperation with Interpol, Europol, Eurojust and partner judicial authorities has directly supported joint investigations, extradition procedures and operational information exchange, ensuring sustainable institutional coordination in cases of corruption and organized crime.

It is also worth mentioning that the Police Supervision Agency in 2025 has intensified cooperation and coordination with Europol and Interpol, through active participation in international forums, exchange of best practices and presentation of concrete operational cases. On 21–22 February 2025, in The Hague, PSA participated in the Europol Conference “Fundamental Rights at the Heart of Policing”, where the Agency was represented by the Director General and several staff members. The event gathered over 130 participants, from 25 EU Member States and 11 non-member countries, who discussed the respect of fundamental rights in policing and the building of cooperative practices to maintain trust between law enforcement agencies and communities. Within this conference, a bilateral official meeting was also held with the Director of the European Economic and Financial Crime Department, where the strengthening of operational cooperation and information exchange was discussed, including the use of data obtained from encrypted platforms Sky ECC and EncroChat. Furthermore, on 8 October 2025, in The Hague, PSA was represented at the 3rd Europol Conference on corruption in law enforcement bodies, organized by the Europol Anti-Corruption Office. Representatives from 16 countries participated in this activity,

EU Member States and operational partners engaged in the fight against corruption within law enforcement agencies. In this context, AMP presented two operations, namely, the “Operation Pika 2” (2022), developed in cooperation with SPAK, the Border Police of the State Police and the Kosovo Police Inspectorate, where 32 security measures with court decision were executed against 32 police officers, including high-level officials, as well as 2 citizens, for criminal offences related to corruption, smuggling and assistance in illegal border crossing. Also, the case of the arrest of a doctor of the Security Academy in 2023 was presented, suspected of passive corruption, abuse of office and falsification of health documents, as an example of effective investigations against corruption in security institutions.

As above, the measures and activities foreseen for 2025 have directly influenced the target value of performance indicator 2.3.1. More specifically, the State Police has undertaken 5 operations with Interpol and Europol and the Special Prosecution Office has undertaken 6 operations with international authorities, marking a total number of 11 operations. Compared to the cumulative data of the previous year, 2024, there is a decrease in the number of operations, which were 17. As a result, based on the administered data, this performance indicator and in implementation of the measurement formula, this indicator is achieved only at the level of 65%.

Presentation of the indicator’s implementation according to the Indicator Passport, is presented as follows:

|                                    |                              |  |
|------------------------------------|------------------------------|--|
| <b>Baseline Values</b>             | 2023                         |  |
|                                    | N/A                          |  |
|                                    | 2024                         | Preparation of assessment  |
|                                    | 2025                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | 2026                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | 2027                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | 2028                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | 2029                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | 2030                         | Upward trend in the number of international operations in which Albania has participated |
|                                    | <b>Target value / Target</b> | <b>year 2025 (target)</b>  |
| <b>year 2025 (achieved target)</b> |                              | <b>65%</b>   |

### Level of achievement of Objective 2.3

The level of achievement of Objective 2.3 *Strengthening international cooperation of law enforcement agencies and judicial bodies in the fight against corruption, economic crime and money laundering*, in relation to the achievement of performance indicators for the period January-December 2025 is **65%**.

The calculation has been carried out by measuring and identifying the evaluated assessment ratios, and the administered data, in accordance with the provisions made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption, 2024-2030.

The level of achievement of Objective 2.3 for this reporting period is **65%**.

**Data verifiability**

The reported data on performance indicators are based on information reported by the prosecution offices (general and special and the State Police).

**Risks for the achievement of Objective 2.3**

For 2025, the achievement of the objective has resulted in a high risk due to the non-achievement of the target values of the performance indicator.

***Realizability of the specific objectives of the strategic goal for the punishment of corruption (Punitive Policy - II)***

Based on the data reported by the institutions responsible for the administration and processing of indicator data, the table below presents the level of achievement of the 3 specific objectives of the strategic goal for the punishment of corruption. By applying the same formula for calculating the level of achievement of objectives, by adding the achievement percentages of the performance indicators and dividing by the number of indicators, the achievement of the strategic goal for the punishment of corruption is **73.1%**.

| Objective  | Achievement |
|--|-------------|
| 2.1. Strengthening of the legislative, institutional framework and capacities for effective administrative investigation of corruption                               | 100%        |
| 2.2. Strengthening of capacities, resources and performance for effective criminal investigation and prosecution of corruption                                       | 54.3%       |
| 2.3. Strengthening of international cooperation of law enforcement agencies and judicial bodies in the fight against corruption, economic crime and money laundering | 65%         |

The realization of the strategic goal for the punishment of corruption, which is at the level of 73.1%, indicates a moderate result of the law enforcement structures during the period January - December 2025.

As a result, considerable progress is observed in strengthening institutional mechanisms and administrative and criminal investigation capacities against corruption. The General Anti-Corruption Directorate has approved and fully implemented its internal regulation, which regulates and sanctions its relationship with Anti-Corruption Coordinators within the scope of administrative verification and investigation competencies. The General Anti-Corruption Directorate has verified and completed 439 cases, for which the following are referred: 71 final reports proposing 207 administrative measures and 234 recommendations; 32 cases have been

forwarded for competence, as well as 336 cases have been prepared as archive memos and/or replies for which no administrative proceedings cases are found. The GDoA has also submitted 2 cases to the Prosecutor’s Office of the Judicial District of Tirana, criminal complaints. In the field of criminal prosecution, the legal framework for asset recovery and for institutional consolidation and the organization and functioning of the Asset Recovery Office within the State Police has been approved. The strengthening of the structures of the State Police and the creation of specialized units for the investigation of corruption, money laundering and financial crimes has continued, accompanied by the intensification of trainings for police officers and prosecutors, with over 100 training activities, and broad participation in regional cooperation, as well as revised curricula from the School of Magistrates. The Prosecutorial Bodies of General Jurisdiction have completed 148 cases for corruption-related criminal offences. The Special Prosecution Office has completed 127 cases for corruption-related criminal offences. The Police Supervision Agency has intensified its investigative activity in 2025, referring 336 criminal cases for 444 subjects and implementing 133 security measures, in close cooperation with the prosecution offices. Abuse of office and passive corruption remain the most widespread forms of illegality (around 30% of cases), reflecting ongoing challenges in the integrity of police structures. In parallel, 1677 complaints have been processed and 40 inspections have been carried out, strengthening administrative and disciplinary oversight mechanisms. The activity of the PSA is also characterized by an increased proactive approach, through interventions on initiative and broad use of reporting channels for the identification of violations, with the use of communication mechanisms. The State Police and the Special Prosecution Office have carried out 11 joint operations with Interpol and Europol and other international authorities. AASCA has seized 726 assets with a value of 6,043,627,188.04 ALL and of these, for corruption criminal offences there are 30 assets with a value of 693,553,42.00 ALL (1.15%)

The satisfactory realization of the performance indicators for objectives 2.1–2.3 demonstrates the institutional commitment of law enforcement bodies to the organization of structures and the increase of technical professional capacities in the fight against corruption for moderate effectiveness and efficiency in verification and criminal prosecution of corruption crimes.

***Awareness Policy (III) – Summary of achievements in awareness on corruption***

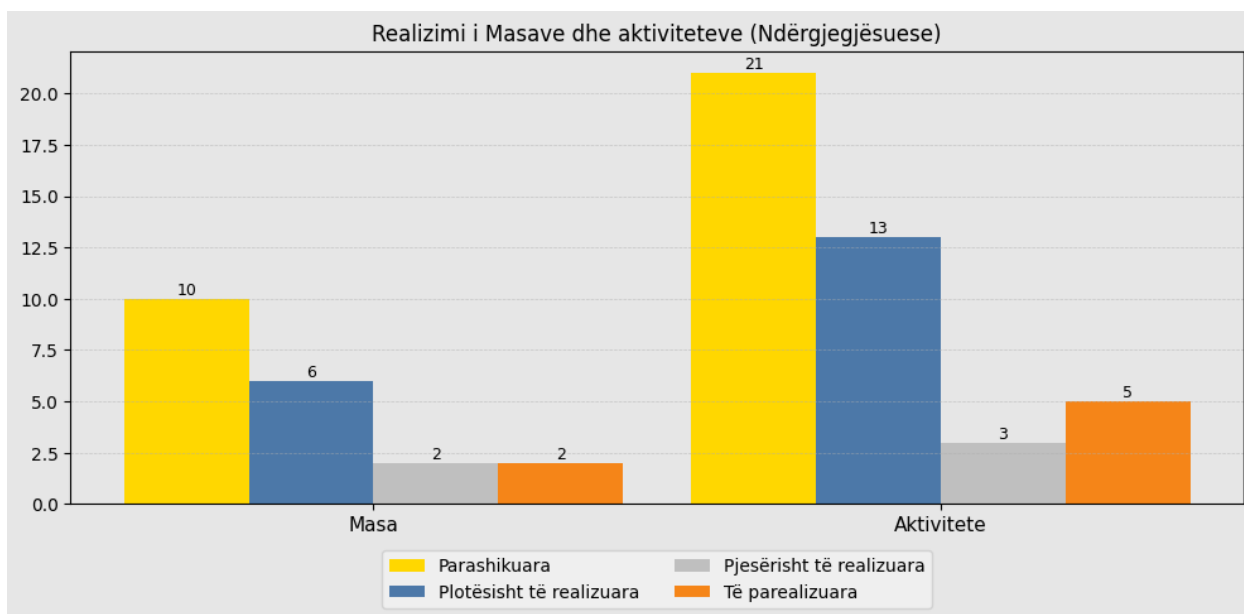
Through the ISAC **awareness policy goal**, it aims to increase public participation in the fight against corruption by reporting it and being active in prevention initiatives. Education of young people on issues of ethics, proactive involvement of civil society organizations, the private sector and women in the fight against corruption are the focus of the awareness approach of ISAC 2024–2030.

During the reporting period, the measures (products) and activities were implemented according to the table below.

| Policy Objectives | Measures and Activities | Implementation of Measures and Activities |                   |                       |                 |
|-------------------|-------------------------|---|-------------------|-----------------------|-----------------|
|                   |                         | Planned measures and                      | Fully implemented | Partially implemented | Non-implemented |

|                 |            | activities for 2025 | measures and activities | measures and activities <sup>86</sup> | measures and activities <sup>87</sup> |
|-----------------|------------|---------------------|-------------------------|---------------------------------------|---------------------------------------|
| Awareness (III) | Measures   | 10                  | 6                       | 2                                     | 2                                     |
|                 | Activities | 21                  | 13                      | 3                                     | 5                                     |

It results that out of 10 measures and 21 activities foreseen in the Action Plan 2024–2026, for the year 2025, for the Awareness Policy, 6 measures and 13 activities have been fully implemented, 2 measures and 3 activities partially, and 2 measures and 5 activities not implemented (measures: 3.2.2 and 3.4.1 and activities: 3.2.2.2, 3.2.2.3., 3.3.1.2, 3.3.3.3 and 3.4.1.1).



From the 4 performance indicators for the Awareness Policy (III), the target value has been fully achieved for 3 performance indicators and for 1 it has been partially achieved.

| Awareness | Performance Indicators | Implementation of Performance Indicators           |  |  |
|-----------|------------------------|--|--|--|
|           |                        | Target value has been fully achieved <sup>88</sup> | Target value has been partially achieved <sup>89</sup> | Target value has not been achieved <sup>90</sup> |
|           | 4                      | 3  | 1  | 0  |

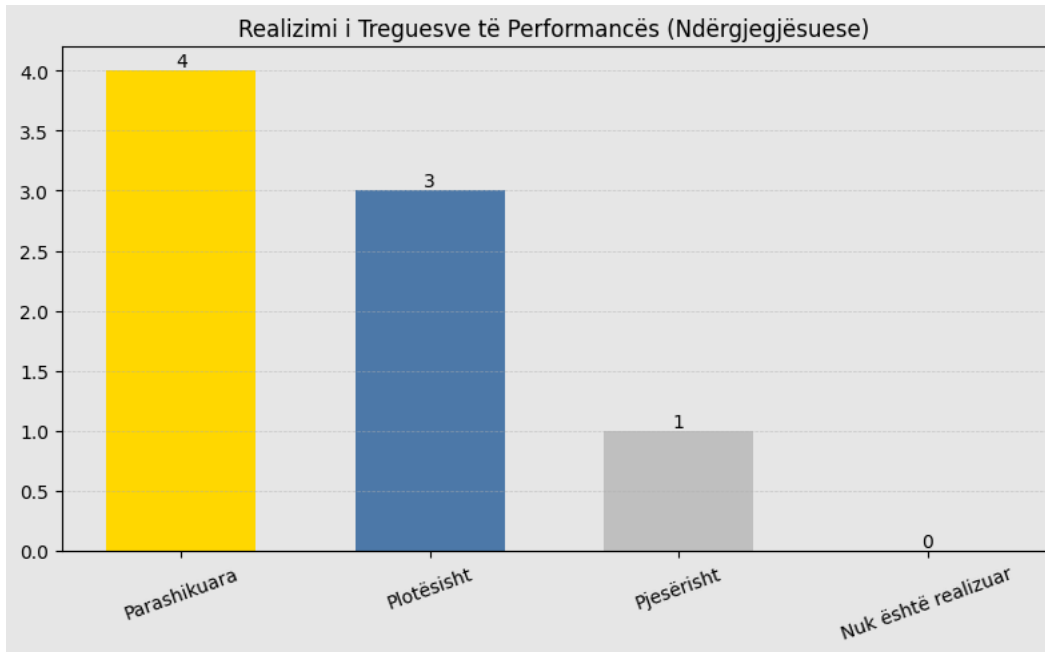
<sup>86</sup> Activity “partially implemented” is an activity that has been implemented at a level from 50 to 100 percent.

<sup>87</sup> Activity “not implemented” is an activity that has been implemented at a level from 0 to 50 percent.

<sup>88</sup> That has been implemented at the level of 100 percent..

<sup>89</sup> That has been implemented at a level from 50 to 100 percent.

<sup>90</sup> That has not been implemented and an indicator for which data have not been collected or it has not been possible to collect data.



**3.1 Raising citizens’ awareness of the negative consequences of corruption and encouraging them to oppose, denounce and report corruption.**

For this objective, 1 performance indicator is defined:

*3.1.1: Increased public awareness of the operational mechanisms in the fight against corruption.*

The action plan for Objective 3.1, for the period 2025, foresees 5 activities and 1 measure.

The target value for performance indicator 3.1.1 for the year 2025 is: 5% increase in awareness and increased publication in receiving information in public authorities.

In order to achieve the values of the indicator in accordance with the performance indicators passport and specifically with the 2024–2026 action plan, the activities (5) and measure (1) are foreseen as follows.

|         |  |
|---------|--|
| 3.1.1   | Increase of awareness and continuous communication of citizens on the negative consequences of corruption in society |
| 3.1.1.1 | Establishment of a website for GDoA  |
| 3.1.1.2 | Visibility and Communication Plan (annual) of the Directorate General of Anticorruption, drafted and published       |
| 3.1.1.3 | Organization of the annual awareness campaign on the fight against corruption “Integrity Week”                       |

|         |   |
|---------|---|
| 3.1.1.4 | Cooperation agreement with public TV for television broadcasts (shows, interviews, segments, announcements) |
| 3.1.1.5 | Monthly e-bulletin ISAC   |

The implementation of the foreseen measure is carried out through the activities foreseen for implementation throughout the period and which will continue also during the other years of implementation of the action plan. Measurement and progress will be done on a 6-month and annual basis.

*During January – December 2025*, the official website of the General Directorate of Anticorruption has been established and made accessible to the public. The website provides detailed information on the organisation and functioning of GDoA, its activity and the way of communication with the general public. Dedicated sections for reporting cases of corruption (denunciations), strategic documents, public announcements and educational materials for citizens are accessible on this website. The website address is: [www.antikorrupsioni.gov.al](http://www.antikorrupsioni.gov.al).

Regarding the preparation of a communication and visibility plan, 2025, for the fight against corruption, the document has been drafted, approved and published, which contains public communication activities, awareness campaigns and the use of social media for informing citizens about the consequences of corruption and reporting mechanisms. The document contains a list of public activities to promote the fight against corruption and with the aim of raising awareness and educating the general public. The document contains a total of 8 activities<sup>91</sup>, distributed for implementation throughout the year 2025 (6M1 – 6M2, 2025). The document can be accessed at the link: [www.antikorrupsioni.gov.al/kreu/lista-dokumenteve/](http://www.antikorrupsioni.gov.al/kreu/lista-dokumenteve/).

From 2–16 December 2025, the 7th edition of “Integrity Week 2025” was held, a broad awareness campaign with institutional, educational and cross-sectoral activities, aimed at strengthening the culture of integrity, transparency and accountability in public administration and society. The annual campaign culminated with the conference proceedings “Integrity: A compass for democracy and competitiveness”<sup>92</sup>, organized by the International Chamber of Commerce, with the participation of representatives of public institutions, international experts, the private sector and civil society. The discussions focused on the role of integrity in increasing public trust and institutional competitiveness, as well as on local integrity planning practices and the implementation of Integrity Plans under the ISAC. In this edition of “Integrity Week”, the debate “The Voice of Youth for Integrity”<sup>93</sup>, was held, with the participation of high school students, in cooperation with the Council of Europe and the Ministry of Education. The activity aimed at raising awareness among young people on ethics, accountability and integrity, as part of the Educational Anti-Corruption Program in implementation of ISAC 2024–2030. At the COD center, the exhibition “Integrity Inspires: Youth speak through art” was organized,<sup>94</sup> where high school students presented artistic creations on the values of integrity and transparency. The activity

<sup>91</sup> Integrity Week 2025 is also part of it.

<sup>92</sup> <https://mapa.gov.al/newsroom/java-e-integritetit-2025-zhvillohet-konferenca-integriteti-nje-busull-per-demokracine-dhe-konkurrueshmerine/>

<sup>93</sup> <https://mapa.gov.al/newsroom/ne-kuader-te-javes-se-integritetit-zeri-i-te-rinjve-per-integritet-bashkon-shkollat-e-mesme-ne-nje-debat-per-ndershmerine/>

<sup>94</sup> <https://mapa.gov.al/newsroom/te-rinjite-ne-qender-te-artit-integriteti-frymezon-ekspozite-ne-kuader-te-javes-se-integritetit/>

demonstrated the use of art as a tool of awareness-raising and active involvement of young people in building a culture of integrity. In the framework of strengthening institutional mechanisms, during “Integrity Week” the Network of Coordinators and Ethics Advisors in the public administration was launched<sup>95</sup>, as a joint initiative of DoPA, IDM and MSPAA. The Guide for Ethics Coordinators and Advisors was also presented, which standardises the role, functions and working instruments, aiming at strengthening the preventive and advisory role and inter-institutional cooperation in the field of ethics. The 30th anniversary of the Public Procurement Agency was also marked<sup>96</sup>, where reflection was made on the progress and challenges of the public procurement system, with emphasis on transparency, professionalisation, the use of electronic systems, risk assessment of corruption and approximation to European standards. The activity also included assessments for public officials with high performance and opportunities for international professional development. Subsequently, the event “Integrity in Health” was held<sup>97</sup>, during which the Cooperation Agreement was signed with the Embassy of Switzerland, which provides technical assistance from the Basel Institute on Governance for strengthening prevention mechanisms and transparency in the health sector. “Integrity Week 2025” was concluded with the VII National Conference on the Right to Information<sup>98</sup>, where the innovations of the platform “Transparent Albania” were presented and the institutional commitment to proactive transparency, accountability and more open institutions was reaffirmed, in function of the European integration process.

Overall, Integrity Week 2025 served as a consolidated platform of awareness-raising, dialogue and action, contributing to the strengthening of the culture of integrity in public administration, the involvement of young people and the increase of public trust in state institutions. More data about it can also be found in the e-bulletin “anticorruption” December 2025, at the link: <https://antikorrupsioni.gov.al/lista-buletineve/>.

GDoA has prepared and drafted the text of the Cooperation Agreement between the National Anti-Corruption Coordinator and ART with the aim of: *cooperation for the realisation and broadcasting of television programmes on ethics and integrity, which promote public awareness and the fight against corruption, through informing and educating the public regarding the impacts of corruption, its consequences, as well as the possibilities and mechanisms to fight it.* The Agreement aims to create the possibilities of: (1) Production and broadcasting of documentaries, informative spots and educational shows, (2) Promotion of the activities of the National Anti-Corruption Coordinator, (3) Organisation of awareness-raising campaigns for the public, and (4) Exchange of information and expertise on television content. The Cooperation Agreement remains in the process of discussion and signing.

The General Directorate of Anticorruption has regularly continued with the drafting, distribution and publication of the monthly e-bulletin “Anticorruption”. The e-bulletin “Anticorruption” is a broad communication tool that aims to inform through summarising the main activities carried out

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<sup>95</sup> <https://mapa.gov.al/newsroom/lancohet-rrjeti-i-koordinatoreve-dhe-keshilltareve-te-etikes-ne-administraten-publike-gjate-javes-se-integritetit/>

<sup>96</sup> <https://mapa.gov.al/newsroom/gjate-javes-se-integritetit-shenohet-30-vjetori-i-agiencise-se-prokurimit-publik/>

<sup>97</sup> <https://mapa.gov.al/newsroom/integriteti-ne-shendetesi-firmoset-marreveshja-e-bashkepunimit-me-ambasaden-e-zvices/>

<sup>98</sup> <https://mapa.gov.al/newsroom/konferenca-e-vii-te-kombetare-e-se-drejtes-per-informim-permbyll-javen-e-integritetit-2025/>

by the Minister of State for Public Administration and Anticorruption and the General Directorate of Anticorruption in the anticorruption field, on a monthly basis. For this year, numbers 44–55 have been published, for the months January–December 2025. The bulletins can be found published and accessed at the link: [www.antikorrupsioni.gov.al/lista-buletineve/](http://www.antikorrupsioni.gov.al/lista-buletineve/), as well as on the social profiles of the General Directorate of Anticorruption on Facebook, LinkedIn, Instagram. This directorate also uses an email address specifically for sending the e-bulletin from [infoak@dpak.gov.al](mailto:infoak@dpak.gov.al).

As above, the measures and activities foreseen for the year 2025 have directly influenced the target value of performance indicator 3.1.1. The data administered by the General Directorate of Anticorruption and the Minister of State for Public Administration and Anticorruption<sup>99</sup> demonstrate a proactive approach of information and awareness-raising on the basis of which is also based the evaluation report that sets the foundations of values for increase in the following years of implementation of the strategy. The establishment and functioning of the GDoA website, the increased use of GDoA social networks, and the regular information of citizens and the general public through them and information mechanisms (anticorruption e-bulletin) demonstrate an achievement of the target value of the performance indicator in the amount of 100%.

Presentation of the indicator’s implementation according to the Indicators Passport is as follows:

|                                    |                              |  |
|------------------------------------|------------------------------|--|
| <b>Baseline values</b>             | 2023                         |  |
|                                    | N/A                          |  |
|                                    | 2024                         | Preparation of the evaluation methodology and establishment of the baseline level for the start of measurement |
|                                    | 2025                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | 2026                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | 2027                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | 2028                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | 2029                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | 2030                         | Increased information of citizens about the operational mechanisms in the fight against corruption             |
|                                    | <b>Target value / Target</b> | <b>year 2025 (target)</b>  |
| <b>year 2025 (achieved target)</b> |                              | <b>100%</b>  |

<sup>99</sup> <https://mapa.gov.al>

### **Level of implementation of objective 3.1**

The level of achievement of Objective 3.1 *Raising citizens' awareness of the negative consequences of corruption and encouraging them to oppose, denounce and report corruption*, in relation to the achievement of the performance indicator for the period January–December 2025 is **100%**.

The calculation has been carried out by measuring and identifying the increased information and visibility in accordance with the forecast made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption, 2024–2030.

The level of achievement of Objective 3.1 for this reporting period is **100%**.

### **Data verifiability**

The reported data on the performance indicators are based on the information administered by the Directorate General of Anticorruption.

### **Risks for the achievement of Objective 3.1**

For the year 2025, the achievement of the objective has resulted in low risk, ensuring the continuity of information and public awareness in the fight against corruption.

### **3.2 Education of young people on ethics, integrity and proactive engagement in the fight against corruption.**

For this objective, 1 performance indicator is defined:

*3.2.1: Percentage of schools in which the ethics and integrity curriculum has been implemented from the average number of schools where these curricula have been implemented in the last three years (increasing trend)*

The action plan for Objective 3.2, in the period January–December 2025, foresees 7 activities and 3 measures.

The target value for the performance indicator 3.2.1 for the year 2025 is: 5% annual increase of the average number of schools where the ethics curriculum has been implemented.

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, the activities (7) and measures (3) are foreseen as follows.

|         |  |
|---------|--|
| 3.2.1   | Strengthening of the ethics and integrity component in curricula at all levels of pre-university education             |
| 3.2.1.1 | Harmonized curriculum for integrity and legality in pre-university education institutions                              |
| 3.2.1.3 | Cooperation agreement with non-public educational institutions for the inclusion of activities on ethics and integrity |
| 3.2.2   | Strengthening the aspect of ethics and integrity in educational media programs (TV and radio)                          |
| 3.2.2.1 | Cooperation agreement with ART for programs on ethics and integrity  |

|         |   |
|---------|---|
| 3.2.2.2 | Cooperation with public and non-public radio-television broadcasters for programs on ethics and integrity   |
| 3.2.2.3 | Radio-television programs for the fight against corruption  |
| 3.2.3   | Promotion of the importance of proactive engagement of young people in anti-corruption  |
| 3.2.3.1 | Awareness campaigns on the proactive engagement of young people in the fight against corruption   |
| 3.2.3.2 | Intensification of the use of social networks and well-known opinion leaders as collaborators with young people for initiating their proactive engagement in the fight against corruption |

The implementation of the foreseen measures is carried out through the activities planned for implementation during the period and which will continue during the following years of the implementation of the action plan. Measurement and progress will be carried out on a 6-month and annual basis.

*During January–December 2025*, the evaluation of the educational curriculum for the revision of the program for the inclusion of anti-corruption topics has been successfully finalized. With two sub-legal acts of the Minister of Education, the curricula have been approved respectively: Order No. 555, dated 28.10.2025, of the Minister of Education and Sport “On the approval of teaching programs of some subjects of the core curriculum of some grades of basic education” and Order No. 556, dated 28.10.2025 of the Minister of Education and Sport “On the approval of teaching programs of some subjects of the core curriculum and elective curriculum of upper secondary education”. The new curriculum includes basic information and knowledge about corruption, its forms, consequences and the fight against it, suitable for students of grades 1, 6 and 10.

Also for the year 2025, the agreement signed in 2023 remains in force for the implementation of the project “Education against corruption”, an important initiative for the education and awareness of Albanian youth regarding the challenges and consequences of corruption. This initiative is the result of a cooperation agreement signed on 4 December 2023 between the National Coordinator against Corruption, the Ministry of Education and Sport and the Embassy of Italy in Albania, with the involvement of the Italian law enforcement agency Guardia di Finanza. The project has as its main objective to influence the awareness and education of high school students through a series of meetings and creative activities organized in 12 high schools in major cities of Albania. For this purpose, in 2025, lessons were conducted with the start of the academic year 2025–2026, in schools of the city of Tirana, in the schools “Asim Vokshi”, “Ismail Qemali”, “Qemal Stafa”, “Petro Nini Luarasi”, “Eqerem Çabej” and “Myslym Keta”. These activities were carried out by representatives of GDoA and focused on raising students’ awareness of the values of integrity, ethics, civic responsibility and their role in preventing and reporting corruption from an early age.

Meanwhile, a cooperation agreement has also been formalized with the civil society organization ALTRI, for the implementation of the project “Empowering students for integrity: The fight against corruption in higher education”. In this framework, during the months May–June, three open sessions were held at the universities of Durrës, Shkodër and the non-public university “Marin Barleti” with young students (first year). The topics of the session were anti-corruption mechanisms and the bridges of ethics and integrity in their function.

The cooperation agreement with ART to provide programs on ethics and integrity remains a draft for discussion and approval, which will also open the way for the broadcasting of television programs, interviews and segments that inform citizens about the consequences of corruption and promote reporting mechanisms.

Initiatives for radio-television programs on ethics and integrity remain unimplemented.

Regarding the organization of awareness campaigns for youth engagement, in 2025 meetings (open sessions) were held in three universities: “Luigj Gurakuqi” University in Shkodër, “Marin Barleti” University in Tirana and “Aleksandër Moisiu” University in Durrës, with an audience of students of legal and political sciences. Knowledge and presentation of GDoA, legal and institutional mechanisms against corruption, the importance of integrity and reporting of corruption cases, examples from practice and ethical dilemmas were also provided in the meetings. The meetings were held by the technical staff and lecturers of GDoA, joined also by a field expert in law, a university professor, Mr. Ervin Karamuço. Also, on 9 December 2025 an open meeting (forum) was held with students of the Faculty of Law on corruption prevention mechanisms, with the participation of senior GDoA staff.

The use of GDoA social networks has been continued and improved, on Instagram (drejtoriaepergjithshmeak) with the aim of intensifying communication and information sharing. During December 2025, the social networks of GDoA and MSPAA were populated with awareness videos and messages against corruption from public figures of different fields, domestic and foreign.

As above, the measures and activities planned for the year 2025 have directly influenced the target value of performance indicator 3.2.1. Also, it results that in accordance with the indicator target, the MES has made progress with the ethics and anti-corruption curriculum for schools (grades 1, 6 and 10) approved with two acts as: Order No. 555, dated 28.10.2025 of the Minister of Education and Sport “On the approval of teaching programs of some subjects of the core curriculum of some grades of basic education” and Order No. 556, dated 28.10.2025 of the Minister of Education and Sport “On the approval of teaching programs of some subjects of the core curriculum and elective curriculum of upper secondary education”. The new programs with specific topics are expected to start implementation and teaching in the academic year 2026–2027. As a result, based on the administered data, this performance indicator and in implementation of the measurement formula, it results that this indicator has been achieved only at the level of 50%.

Presentation of the indicator’s realization according to the Indicator Passport is as follows:

|                        |      |  |
|------------------------|------|--|
| <b>Baseline values</b> | 2023 |  |
|                        | N/A  |  |
|                        | 2024 | Preparation of the evaluation methodology and establishment of the baseline level for the start of measurement     |
|                        | 2025 | 5% annual increase in the average number of schools where the ethics curriculum has been implemented               |
|                        | 2026 | 10% annual increase in the average number of schools where the ethics curriculum has been implemented (cumulative) |

|                       |                             |  |
|-----------------------|-----------------------------|--|
|                       | 2027                        | 15% annual increase in the average number of schools where the ethics curriculum has been implemented (cumulative) |
|                       | 2028                        | 20% annual increase in the average number of schools where the ethics curriculum has been implemented (cumulative) |
|                       | 2029                        | 25% annual increase in the average number of schools where the ethics curriculum has been implemented (cumulative) |
|                       | 2030                        | 30% annual increase in the average number of schools where the ethics curriculum has been implemented (cumulative) |
| Target value / Target | year 2025 (targeted value)  | % annual increase of the average number  |
|                       | year 2025 (achieved target) | 50%  |

### Level of achievement of Objective 3.2

The level of achievement of Objective 3.2 “*Education of young people on ethics, integrity and proactive engagement in the fight against corruption*”, in relation to the achievement of the performance indicator for the period January–December 2024 is **50%**.

The calculation has been carried out by measuring and identifying the development of the ethics curriculum, in accordance with the forecast made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption, 2024–2030.

The level of achievement of Objective 3.2 for this reporting period is **50%**.

### Data verifiability

The reported data on the performance indicators are based on the information administered and coordinated by the Directorate General of Anticorruption.

### Risks for the achievement of Objective 3.2

For the year 2025, the achievement of the objective has resulted in medium risk, related to the start of implementation of the ethics and integrity curriculum program in pre-university education schools.

### 3.3 *Involvement of the private sector, civil society organizations and academia with an awareness-raising role in the fight against corruption.*

For this objective, 1 performance indicator is defined:

3.3.1: *Percentage of joint anti-corruption campaigns of public institutions with the private sector, civil society organizations, academia and the media, from the average recorded in the last three years (increasing trend).*

The action plan for Objective 3.3, in the period January–December 2025, foresees 7 activities and 4 measures.

The target value for the *performance indicator 3.3.1* for the year 2025 is: 5% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and the media.

In order to achieve the values of the indicator in accordance with the performance indicator passport and specifically with the 2024–2026 action plan, the activities (7) and measures (4) are foreseen as follows.

|         |  |
|---------|--|
| 3.3.1   | Active and expanded involvement of the private sector in the fight against corruption  |
| 3.3.1.1 | Institutionalization of cooperation with private sector organizations and chambers (cooperation agreements)  |
| 3.3.1.2 | Consultation meetings for the preparation and approval of legislation in the field of business between legislative proposing bodies and the private sector                                       |
| 3.3.1.3 | Improvement of mechanisms for reporting and denouncing corruption by the private sector, promotion of mechanisms and encouragement of the private sector and associations (cooperation platform) |
| 3.3.2   | Active and expanded involvement of civil society organizations in the fight against corruption   |
| 3.3.2.3 | Improvement of interaction between public authorities and CSOs based on the principles of the Open Government Partnership (OGP)  |
| 3.3.3   | Involvement of academia in the fight against corruption  |
| 3.3.3.2 | Regular consultation of policy documents and reports with the team of experts from academia  |
| 3.3.3.3 | Annual regular activity with participation of lecturers and experts from academia on issues related to the fight against corruption, ethics and anti-corruption mechanisms                       |
| 3.3.4   | Involvement of media and journalism in the fight against corruption  |
| 3.3.4.2 | Periodic (3-month) meetings with the Network of Active Journalism against Corruption   |

The implementation of the foreseen measures is carried out through the activities planned for implementation during the period and onwards. Measurement and progress will be carried out on a 6-month and annual basis.

*During January–December 2025*, the Directorate General of Anticorruption has drafted a cooperation agreement to be concluded and implemented in the future with units and representatives of the private sector (businesses). The agreement is expected to create a comprehensive cooperation platform between the private sector and public institutions for the promotion of integrity and anti-corruption standards in Albania. The agreement is intended to be concluded between the authority responsible for anti-corruption and representative chambers of the private sector (business chambers, business associations).

Regarding consultation meetings of legal acts in the field of business between legislative proposing bodies and the private sector (activity 3.3.1.2), no such cases are reported for the year 2025.

In 2025, with the access to the GDoA website, another mechanism for reporting corruption cases was added, specifically on the platform: <https://antikorrupsioni.gov.al/denonco-korrupsionin/> . Also, with the launch of the platform [www.rrjetantikorrupsioni.al](http://www.rrjetantikorrupsioni.al) where GDoA and its staff are members, another additional mechanism for reporting and notifying corruption cases is mentioned. Furthermore, previously known and applicable mechanisms have been used, such as: adresa koordinatori.ak@dpak.gov.al, contacts of Anti-Corruption Coordinators, and the official communication channels with the Directorate General of Anticorruption.

Also, the Agency for Dialogue and Co-Governance has maintained an operational dedicated window to report corruption on the co-governance platform, where every citizen and business can submit a report and present facts about a corruption act that has occurred or been attempted, when state administration employees or heads of institutions have requested favors or committed abusive actions. The official website of the institution: <https://adb.gov.al/> has a dedicated section “Report Corruption” to channel citizens’ and businesses’ reports when facing situations involving corruption elements, bribery, etc., which has been implemented in a way that is easily usable. On this platform, a total of 29 complaints have been administered in the “Report Corruption” section, of which: citizens for 25 cases; businesses for 4 cases, and of which 21 cases have been completed. ADG monitors the process on a daily basis and in close cooperation with the relevant structure, the Directorate General of Anticorruption.

In 2025, GDoA promoted from June cooperation with civil society for concrete initiatives, such as the methodology of corruption risk assessment, at the link: <https://rrjetantikorrupsion.al/trajnimi-mbi-metodologjine-e-vleresimit-te-riskut-te-korrupsionit20-maj-2025/>, continuing with active participation in the launch of the platform as a practical tool for cooperation, coordination and joint initiatives among different actors. The platform offers space for dialogue, information exchange and sharing of good practices, supporting a more open and accountable governance, also at the link: <https://rrjetantikorrupsion.al/partneritet-per-integritet-dhe-transparence-18-dhjetor-2025/>.

The platform is designed as a communication channel between Civil Society Organizations engaged in the fight against corruption and other actors involved in this activity. The platform aims to encourage the participation of anti-corruption institutions, media, citizens and businesses to share information and to discuss and advocate relevant issues. For this purpose, in 2025 the annual monitoring report on the implementation of the anti-corruption strategy and action plan 2024 (May 2025, notification for participation in the meeting of the Anti-Corruption Thematic Team, on 10 June 2025<sup>100</sup> and of the SCA Integrity Plan, in the link: [https://rrjetantikorrupsion.al/wp-content/uploads/2025/06/Plani-i-Integritetit-ASHK\\_-per-konsultim-final.pdf](https://rrjetantikorrupsion.al/wp-content/uploads/2025/06/Plani-i-Integritetit-ASHK_-per-konsultim-final.pdf).

Monitoring reports of the ISAC drafted in 2025, invitations and notifications for participation in consultation meetings have been carried out in the months September–November 2025 for the laws drafted by MSPAA such as those for whistleblowing and protection of whistleblowers, and those for lobbying have been notified through social networks, the e-bulletin and electronic

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<sup>100</sup> <https://mapa.gov.al/newsroom/miratohet-raporti-i-monitorimit-te-strategjise-ndersektoriale-kunder-korrupsionit-2024-2030/>.

communication by email. An annual meeting with experts and technicians coming from academia (activity 3.3.3.3) has not been achieved to be held.

In the framework of periodic meetings with the Active Journalism Network against Corruption, the Office of the Commissioner for the Right to Information and Protection of Personal Data has held the annual meeting with representatives of civil society and investigative media. The discussions were focused on the problems and difficulties faced by journalists and civil society organizations in securing information from public authorities, as well as on the need to strengthen the culture of institutional transparency. During this meeting it was emphasized the necessity of identifying additional mechanisms for simplifying and more effective enforceability of the legislation on the right to information, with the aim of increasing the efficiency of public authorities in providing complete and timely information. Also, the Office of the Commissioner, in cooperation with the Minister of State for Public Administration and Anti-Corruption, organized the VII National Conference on the Right to Information with the theme “Agora of transparency in the time of integration”<sup>101</sup>. The conference served as a platform of dialogue between public authorities, media, civil society and academic institutions, addressing the challenges of institutional transparency and strengthening accountability in the framework of the European integration process.

The above, the measures and activities foreseen for the year 2025, have directly influenced the targeted value of performance indicator 3.3.1. The Minister of State for Public Administration and Anti-Corruption and the General Directorate of Anti-Corruption have developed the national awareness campaign “Integrity Week, 2025” with the participation of interest groups. Also, political officials near the line minister, and technical staff of GDoA have joined awareness campaigns and cooperation projects with focus on anti-corruption education such as: the project with civil society<sup>102</sup> “Empowering students on integrity: The fight against corruption in higher education”, during March–April 2025, also the cooperation with the private sector<sup>103</sup> for the consolidation of integrity instruments (Integrity Plans) in November 2025. Also mentioned is the participation in the campaign undertaken by students of the University of Tirana, Faculty of Law for awareness of anti-corruption mechanisms, in December 2025. As a result, based on the administered data this performance indicator and in implementation of the measurement formula it results that this indicator has been achieved only at the level of 100%.

The presentation of the indicator’s realization according to the Indicator Passport is as follows:

|                    |      |  |
|--------------------|------|--|
| <b>Base Values</b> | 2023 |  |
|                    | N/A  |  |
|                    | 2024 | Preparation of the evaluation methodology and establishment of the baseline level for the start of measurement   |
|                    | 2025 | 5% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media |

<sup>101</sup> <https://idp.al/2025/12/16/konferenca-e-vii-kombetare-per-te-dreiten-e-informimit/>.

<sup>102</sup> With the Altri Center.

<sup>103</sup> With the American Chamber of Commerce.

|                       |                             |  |
|-----------------------|-----------------------------|--|
|                       | 2026                        | 10% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media (cumulative) |
|                       | 2027                        | 15% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media (cumulative) |
|                       | 2028                        | 20% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media (cumulative) |
|                       | 2029                        | 25% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media (cumulative) |
|                       | 2030                        | 30% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media (cumulative) |
| Target Value / Target | Year 2025 (targeted value)  | 5% increase in the number of joint anti-corruption campaigns undertaken by public authorities with the private sector, civil society organizations, academia and media               |
|                       | Year 2025 (achieved target) | 100%   |

### Level of achievement of Objective 3.3

Level of achievement of Objective 3.3 *Inclusion of the private sector, civil society organizations and academia with an awareness-raising role in the fight against corruption*, in relation to the achievement of the performance indicator for the period January–December 2025 is **100%**.

The calculation has been carried out by measuring and evidencing the planning and organizations carried out, in accordance with the provision made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption, 2024–2030.

The degree of achievement of Objective 3.3 for this reporting period is **100%**.

### Verifiability of data

The reported data on performance indicators are based on the information administered and coordinated by the General Directorate of Anti-Corruption.

### Risks for the achievement of Objective 3.3

For the year 2025, the achievement of the objective presents a low risk as it has resulted with good development of the carrying out of cooperation with the mentioned interest groups for awareness campaigns.

### **3.4 Strengthening the participation of women to identify and fight corruption at different levels and sectors.**

For this objective, 1 performance indicator has been defined:

*3.4.1: The ratio of the number of anti-corruption projects with gender orientation compared to their number in the last three years.*

The action plan for Objective 3.4, in the period January–December 2025 foresees 2 activities and 2 measures.

The target value for performance indicator 3.4.1 for the year 2025 is: 5% annual increase of gender-based anti-corruption projects.

In order to achieve the indicator values in accordance with the performance indicator passport and specifically with the action plan 2024–2026, the activities (2) and measures (2) have been foreseen as follows.

|         |   |
|---------|---|
| 3.4.1   | Inclusion of the gender component in the terms of reference and the determination of a specific budget for integrity and anti-corruption projects, announced by ASCS                |
| 3.4.1.1 | Annual roundtable with participation of women and girls on their role and engagement in strengthening the integrity of public administration and the fight against corruption       |
| 3.4.2   | Organization of communication and awareness activities with stakeholders with focus on the gender perspective in strengthening integrity and fighting corruption                    |
| 3.4.2.1 | Anti-corruption activities of citizens, human rights activists and interest groups of women and girls as an integral part of the calendar of activities during the “Integrity Week” |

The implementation of the foreseen measures is carried out through the activities foreseen throughout the period and onwards. Measurement and progress will be done on 6-month and annual basis.

*During January–December 2025*, the Agency for the Support of Civil Society, in accordance with strategic priorities for promoting transparency, equality and strengthening the role of civil society organizations, has intensified efforts to promote topics of special importance such as anti-corruption and the gender approach. Within the framework of the Call for Projects no. 18 (decision no. 03, dated 07.07.2025) ([https://amshc.gov.al/wp-content/uploads/2025/07/Vendimi-nr-03-date-07.07.2025 .pdf](https://amshc.gov.al/wp-content/uploads/2025/07/Vendimi-nr-03-date-07.07.2025.pdf)), a total of 160 applications have been submitted, of which 36 projects directly addressed issues related to anti-corruption with gender focus, a significant increase compared to previous calls, which clearly demonstrates the positive effect of awareness-raising measures undertaken by the institution. During this period, 6 applications with this specific focus have been submitted, of which 4 have been selected for funding, while 2 have been disqualified due to lack of complete documentation.

Also, ASCS has organized and conducted 6 public consultative sessions in the cities of Vlora, Berat, Pogradec, Kukës, Shkodër and Tirana, with the active participation of over 75 local civil

society organizations. These data reflect not only a positive increasing trend of interest for priority topics such as anti-corruption and the gender approach, but also the effectiveness of the continuous work of ASCS to create a more favorable environment for the development of projects with broad social impact and inclusive approach.

There are no data for the organization of a roundtable (activity 3.4.1.1) on the role of women and girls in strengthening integrity and ethics as anti-corruption mechanisms.

During the activities of Integrity Week 2025, a variety of events have been carried out by MSPAA, GDoA and their field partners. Details and data can be found in issue 55 of the Anti-Corruption e-bulletin, published at the link: <https://antikorrupsioni.gov.al/lista-buletineve/>.

The above, the measures and activities foreseen for the year 2025, have directly influenced the targeted value of performance indicator 3.4.1. More concretely, ASCS has financed 17 project-proposals with a grant of 23,400,000 ALL, with the theme of the application of anti-corruption projects (priority “Good governance and Anti-corruption) and the development of informative policies for its prevention. Anti-corruption projects constitute 21.4% of all annual project-proposals requested and submitted. As a result, based on the administered data this performance indicator and in implementation of the measurement formula it results that this indicator has been achieved at the level of 100%.

The presentation of the indicator’s realization according to the Indicator Passport is as follows:

|                                    |                              |  |
|------------------------------------|------------------------------|--|
| <b>Base Values</b>                 | 2023                         |  |
|                                    | N/A                          |  |
|                                    | 2024                         | Preparation of the evaluation methodology and establishment of the baseline level for the start of measurement |
|                                    | 2025                         | 5% annual increase of gender-based anti-corruption projects  |
|                                    | 2026                         | 10% annual increase of gender-based anti-corruption projects (cumulative)                                      |
|                                    | 2027                         | 15% annual increase of gender-based anti-corruption projects (cumulative)                                      |
|                                    | 2028                         | 20% annual increase of gender-based anti-corruption projects (cumulative)                                      |
|                                    | 2029                         | 25% annual increase of gender-based anti-corruption projects (cumulative)                                      |
|                                    | 2030                         | 30% annual increase of gender-based anti-corruption projects (cumulative)                                      |
|                                    | <b>Target Value / Target</b> | <b>year 2025 (targeted value)</b>  |
| <b>year 2025 (achieved target)</b> |                              | <b>100%</b>  |

#### Level of achievement of Objective 3.4

Level of achievement of *Objective 3.4 Strengthening the participation of women to identify and fight corruption at different levels and sectors*, in relation to the achievement of the performance indicator for the period January–December 2025 is **100%**.

The calculation has been carried out by measuring and evidencing the data in accordance with the provision made in the list of performance indicators, Annex 2 of the Inter-Sectorial Strategy against Corruption, 2024–2030.

The degree of achievement of Objective 3.4 for this reporting period is **100%**.

### **Verifiability of data**

The reported data on performance indicators are based on the information administered and coordinated by the General Directorate of Anti-Corruption and from ASCS.

### **Risks for the achievement of Objective 3.4**

For the year 2025, the achievement of the objective has resulted in medium risk, which will be influenced by the progress of the implementation of the projects selected by ASCS.

### ***Achievability of the specific objectives of the strategic goal for raising citizens’ awareness against corruption***

Based on the data reported by the institutions responsible for the administration and processing of performance indicator data, the table below presents the level of achievement of the 4 specific objectives of the strategic goal for awareness and education of citizens against corruption.

By applying the same formula for deriving the level of achievement of the objectives – by summing the percentage achievement of performance indicators and dividing by the number of indicators – the achievability of the strategic goal for corruption awareness is **87.5%**.

| <b>Objective</b>  | <b>Achievability</b> |
|---|----------------------|
| 3.1. Increasing citizens’ awareness on the negative consequences of corruption and encouraging them to oppose, denounce and report corruption | 100%                 |
| 3.2. Education of youth on ethics, integrity and proactive engagement in the fight against corruption   | 50%                  |
| 3.3. Inclusion of the private sector, civil society organizations and academia with an awareness-raising role in the fight against corruption | 100%                 |
| 3.4 Strengthening the participation of women to identify and fight corruption at different levels and sectors                                 | 100%                 |

The achievability of the strategic goal for corruption awareness, which is at the level of 87.5%, shows a steady progress in strengthening the culture of integrity and public transparency during the period January–December 2025.

As a result, a series of activities were undertaken with the aim of raising awareness and educating the public on the consequences of corruption and encouraging active participation in its prevention and reporting. The Anti-Corruption Communication and Visibility Plan for the year 2025 was drafted, which included 8 awareness-raising activities, with a focus on promotion and anti-

corruption education based on ethics and integrity, as well as activities with youth/students. The VII edition of the “Integrity Week” was successfully carried out, and the anti-corruption e-bulletin was published regularly. The publication of the GDoA website increases the tools of mass anti-corruption communication. The finalization of the anti-corruption curriculum for young ages, as part of the pre-university secondary education program, offers an innovation and a step of progress for the education and information of youth in the fight against corruption. Cooperations and projects have been recorded with a focus on information and anti-corruption awareness in collaboration with CSOs and the private sector. ASCS has funded 17 project proposals with a grant of 23,400,000 Lek, with the thematic focus on the implementation of anti-corruption projects priority “Good Governance and Anti-Corruption”.

These developments of objectives 3.1–3.4 demonstrate a comprehensive and coordinated approach in increasing public awareness as an essential pillar of the strategy.

#### IV. PROGRESS RELATED TO OBJECTIVES, RESULTS AND IMPACT

##### 4.1 Assessment of main achievements using indicators

Based on the information on the target values of the activities and measures implemented, of the performance indicators, the achievement of objectives for *January – December 2025* is as follows.

| Implementation according to activities and measures  | Implementation according to indicators   |
|--|--|
| <p><u>Weak</u> – 1 objective</p> <p><u>Sufficient</u> - 3 objectives</p> <p><u>Good</u> - 5 objectives</p> <p><u>Very good</u>- 7 objectives</p> | <p><u>Weak</u> - 1 objective</p> <p><u>Sufficient</u> - 1 objective</p> <p><u>Good</u>- 2 objectives</p> <p><u>Very good</u>- 11 objectives</p> <p>* <u>Not measured for this monitoring report</u>– 1 objective</p> |

##### *Success stories (through priority measures)*

The most important main achievements for the period January – December 2025, in the implementation of the Action Plan 2024–2026 of the Inter-Sectorial Strategy against Corruption, based on the implementation of the priority measures identified in its Part III, are as follows:

1. *In 2025*, in-depth legal analyses have been drafted which have served as a basis for the development of the “Anti-Corruption” legal package, including the approval of the legal framework in the field of whistleblowing and protection of whistleblowers (law approved by the Assembly), lobbying (law approved by the CoM), donations and sponsorships (preparation for draft law), as well as initiatives on conflict of interest and control of political party financing (draft laws for approval in the Assembly).
2. *In 2025*, the Methodology for Corruption Risk Assessment in the public sector has been approved, creating a standard instrument for the identification and proactive management of risks, as well as opening the way for the development of sectoral methodologies and their implementation in high-risk sectors such as public procurement, for which the corruption risk assessment methodology has been approved by then PPA.
3. *In 2025*, the national network of Anti-Corruption Contact Points at central and local level has been consolidated, strengthening technical capacities for the coordination, implementation and monitoring of the ISAC, in support of the coordinating role of GDoA, and the network of coordinators for the right to information, ethics, and integrity has been consolidated.
4. *In 2025*, the revision of the “Citizenship” subject curriculum has been completed, with the inclusion of anti-corruption topics for grades 1, 6 and 10. The programs have been approved in 2025 and are expected to be implemented starting from the school year 2026–2027, contributing to early education on integrity.
5. *In 2025*, HIDAACI has imposed 75 administrative fine measures on subjects who have the obligation to submit asset declarations upon completion of their control.
6. *In 2025*, the Special Prosecution and the prosecutions of general jurisdiction have continued investigations for corruption criminal offenses and have completed 275 corruption cases.
7. *In 2025*, the official website of the General Directorate of Anti-Corruption has been made functional and the regular publication of the “Anti-Corruption” e-bulletin has continued, as well as continuous communication through social networks, increasing public access to information and awareness on anti-corruption policies.
8. *In 2025*, lectures and awareness-raising activities have been carried out with students within the framework of projects on integrity in higher education, strengthening the role of youth in promoting anti-corruption values.
9. *In 2025*, ASCS has published the 18th call, from which 4 project proposals with a gender focus have been selected as winners.

#### ***4.2 Assessment of challenges, gaps and inefficiencies***

Based on the results of the monitoring carried out for the period *1 January – 30 December 2025*, it results that based on the progress of the implementation of the Inter-Sectorial Strategy against Corruption and of the commitments of the Action Plan for the year 2025, it results that:

**- Objectives that present implementation problems:**

n Policy I (Prevention), specific objective 1.3 (at 25%) and 1.5 (0–30% of measures implemented) indicate delays in the follow-up of sectoral measures with high risk and in the protection of finances and the use of public assets. In Policy II (Punishment), objective 2.2 needs to address the need for improvement of capacities and mechanisms to maintain the decreasing trend of *backlog* cases from the bodies that pursue criminal proceedings. In Policy III (Awareness), objective 3.2

remains at 50%, reflecting insufficient intensity of involvement of youth/social actors and the private sector.

- **Implementation of the corruption risk methodology at the beginning of implementation and for the drafting of action plans with preventive measures:**

The Methodology for Corruption Risk Assessment in the public sector and also the assessment methodologies for the spaces of legislation for parliamentary services have been approved and started to be applied, but still require time for sectoral testing such as in: public procurement, property and initiation in healthcare, education, customs and taxes.

- **Insufficient involvement of non-public actors, partners with the public administration:**

The engagement of CSOs, academia, and the private sector in coordination, consultation and communication is still not at satisfactory levels, limiting the impact of awareness and information interventions.

#### ***4.3 Conclusions and recommendations***

This monitoring report is in compliance with the structure of sectoral and intersectoral strategic documents for the good governance agenda within the framework of IPSIS programming. The report provides information on the implementability of policy goals (strategy approaches), of the specific objectives of the strategy, of the achievability of performance indicators according to target and achieved values, of the implementability of measures (products) foreseen to achieve these objectives and of the concrete activities foreseen. The report provides specific information on the achievability of priority measures of the action plan, problems encountered during implementation, challenges of institutions as well as an identification of necessary corrective measures for the following periods.

The monitoring report *January – December 2025* contains statistical and analytical data based on measurable and verifiable evidence, on direct reporting of implementing institutions, on published reports and information, consultation with all factors (implementers and evaluators of the process) and data on the progress report of indicators on comparative bases for each objective of the strategy.

At the conclusion of this report, the recommendations for follow-up and improvement of the process and implementation of anti-corruption measures are:

##### **Legal measures:**

- To approve the draft law “*On Lobbying*”;
- To approve the draft law “*On Prevention of Conflict of Interest in the Exercise of Public Functions*”;
- To draft the draft law “*On Donations and Sponsorships*”;
- To continue the process for drafting the draft law “*On the Financing of Political Parties*”.

##### **Regulatory measures:**

- To finalize sectoral methodologies of corruption risk assessment in the property sector and to start their implementation and the corruption risk assessment and likewise sectoral instruments in customs and taxes, education and health;
- To start the corruption risk assessment in these sectors and drafting of sectoral anti-corruption action plans for all vulnerable sectors;
- To approve integrity plan instruments in all local self-government units (municipalities);
- To conclude cooperation agreements between public authorities and with non-public authorities.

**Operational measures and increase and strengthening of institutional and technical capacities of institutions:**

- To maintain progress for strengthening units such as: anti-corruption contact points, coordinators of the right to information; integrity coordinators;
- To improve technical and operational expertise of staff of public units and in justice institutions for issues of integrity and corruption crime;
- To reduce *backlog* of cases under investigation for corruption by prosecutions;
- To improve public awareness for reporting corruption through awareness campaigns, meetings, forums, public activities.

**General conclusions:**

- To improve financial reporting and to increase the level of standard reporting according to the methodology followed.
- To improve the involvement of non-public actors, CSOs, academia/universities, private sector) for the initiation and implementation of awareness elements of the fight against corruption.

**V. RISKS AND STEPS TO BE ADDRESSED**

***5.1 Risk assessment using also indicators***

In this monitoring report, *January – December 2025*, the risk assessment has been carried out for each objective in accordance with the risk analysis brought by responsible institutions or in the absence of this analysis, of the assessment that the staff of the General Directorate of Anti-Corruption itself has made of the risk in accordance with the level of achievability of objectives.

A list of potential risks for the continuity of the implementation of the Inter-Sectorial Strategy against Corruption, structured according to their nature, may be:

- Unequal capacities (insufficient staff in municipalities and central institutions).
- Poor quality of reported data (increased need for consultations with GDoA).
- Koordinim ndërinstitucional jo i mjaftueshëm.
- Limited financial resources.

## 5.2 Next steps

At the conclusion of this monitoring report for the period *January – December 2025*, from the findings that this document provides, from the analytical data that institutions have reported and from the analysis carried out, the following steps are addressed to be undertaken:

**First**, the implementation of the risk assessment process in public procurement and property should be planned, taking into consideration the use of sector-specific methodologies. The sectoral assessment will continue throughout 2026 in the sectors of health, education, taxation and customs as well.

**Second**, cooperation between law enforcement bodies, as well as between these bodies and the public administration, should be intensified with the aim of coordinating measures regarding cases and indications of corruption in the public sector and by public officials.

**Third**, compliance with and careful follow-up of the completion of reporting formats for data, as well as the calculation of the cost of implementing the ISAC, should be ensured.

**Fourth**, the coordination and harmonization of processes for administrative investigations and the follow-up of recommendations issued by the General Directorate of Anti-Corruption towards other bodies should be improved.

**Fifth**, the internal monitoring system of the anti-corruption strategy should be improved through measurable indicators directly linked to the expected results, while ensuring transparency and accountability at every stage of the implementation of the strategy (in relevance to the Strategy Implementation Manual).

**Lastly**, cooperation with CSOs, academia and the private sector should be strengthened based on a joint calendar of consultations and joint initiatives.