

## CPI 2025 Results and Serbia

This year's two-point drop in the Corruption Perceptions Index (CPI) likely comes as no surprise to anyone in Serbia. It logically continues the previous eight years, during which the score either stagnated or declined. From 42 points in 2016 - the last year Serbia recorded an improvement, the score has now fallen to 33.

It is clear that Serbia does not face merely a problem of "perception of corruption" - another word for "impression", that could be addressed simply by improving the country's image abroad. There has been no meaningful progress in combating corruption. On the contrary, some of the legal and institutional mechanisms intended to prevent, detect, or sanction corruption were further weakened over the past year or once again revealed their dysfunctionality.

Trends in seven (until recently eight) surveys used to calculate the CPI show that external observers have a negative assessment of developments regarding corruption and the capacity of institutions to tackle it. This further reduces the likelihood that the findings reflect only subjective impressions or reactions to isolated controversial cases. None of the seven surveys used this year recorded any improvement. The score would likely have been even worse had the WEF business survey been conducted in 2025, where the decline had been most visible over the previous four cycles.

Citizens of Serbia also perceive corruption as highly widespread. In Transparency Serbia's public opinion survey from March 2025, corruption was identified as by far the country's most pressing societal problem.

The extent to which the anti-corruption system fails to function can be better understood through research on the implementation of specific anti-corruption regulations, as well as findings of international organizations monitoring key areas.

## Why the Results Are Getting Worse and Why Improvement Is Unrealistic

### Priorities and Plans

One key factor contributing to this situation is **the insufficient importance that state authorities attach to the fight against corruption**, even at a declarative level.

Even the Government that adopted the National Anti-Corruption Strategy and accompanying action plans does not treat them as central policy documents, but rather as a formality required by the EU or as a condition for receiving a new tranche under the Western Balkans Growth Plan. Government representatives do not speak publicly about these documents or the measures they contain. Unlike the period 2012–2019, there are no attempts to present new laws (e.g., on public procurement, public enterprises, whistleblowers, or asset origin verification) as "magic solutions" to corruption.

The success of implementation of the Strategy should be assessed based on Serbia's progress in the CPI. The goal is to reach at least the global average (43 at the time of adoption) by the end of 2028, a level Serbia last approached in 2016. Although this target was not ambitious, based on this year's CPI and ongoing trends, the chances of achieving it are merely theoretical, even if the authorities were to suddenly begin implementing anti-corruption measures effectively.

The Government has not taken its planning documents seriously. This is evident in the fact that the already unambitious 2025 Action Plan largely remained a dead letter, with the same activities copied into the 2026 plan.

More importantly, these documents fail to offer adequate solutions to key obstacles identified during their drafting. Even if all envisaged measures are implemented by 2028, progress will be very limited.

Among other shortcomings, the Strategy and action plans fail to address the following issues effectively:

- Prosecutors' failure to initiate investigations ex officio based on publicly documented corruption allegations;
- The Government's and increasingly MPs' proposal, and Parliament's adoption, of special laws and interstate agreements that exclude application of the Public Procurement Law or retroactively alter legal provisions through unfounded "authentic interpretations";
- The widespread appointment of acting officials in violation of legal requirements;
- The Government's failure to publish contracts and key decision-making information;
- The subordination of legislative and executive branches to the President of the Republic and marginalization of independent bodies;
- The narrowing of space for media, civil society, and citizens to contribute to anti-corruption efforts.

The 2025 Prime Minister's exposé, like that of his predecessor in 2024, contains no concrete future plans for fighting corruption, only slogans ("continuation of a zero-tolerance policy") and an announcement of an Action Plan for the period 2026/2028.

Despite anti-corruption being central to EU integration, no reports have been published for the past two years regarding the revised Action Plan for Chapter 23 negotiations with the EU.

## Citizens, Protests, and Government Response

Public dissatisfaction and demands for accountability became visible in opinion polls in early 2025, influenced in part by mass student and civic protests launched in late 2024. Even many government supporters increasingly recognize corruption as a serious problem.

As a response, the President (though not formally competent) announced "results visible by the end of March 2025." Even if such a statement had come from the Chief Prosecutor or Police Director, it would have been problematic, implying that authorities already possessed evidence in numerous cases but had failed to act promptly. The subsequent crackdown proved short-lived, with most arrests related to economic crime rather than corruption offenses.

Protests included demands for publication of documents concerning a major infrastructure project contracted without a tender, as well as broader calls for transparency and accountability. The Government published numerous documents regarding the railway project from Novi Sad to the Hungarian border, repeatedly claiming full disclosure.

However, there was no indication of willingness to change the broader practice of non-transparency in multi-billion-euro projects. The publication of part of the documentation related to a particular project revealed the absence of oversight over compliance with certain contractual obligations (such as the method of selecting subcontractors), as well as the formal and informal influence of state representatives on the

implementation of the contract. It also made it possible to open a well-argued discussion on the harmful consequences of decision-making without public participation, contracting without competition, and operating in secrecy. However, such a debate never took place.

Requests for (institutional) accountability were ignored by the authorities and interpreted as attempts to change the government through extra-institutional means, after which demands for calling elections were brought to the forefront of public protests.

Attempts by the Prosecutor's Office to determine whether corruption was involved in the awarding of this contract, as well as in the alleged corruption of the current minister and other actors in the "Generalštab" case, encountered numerous obstacles, including the withholding of support by the police and other executive authorities, and a media campaign against prosecutors, culminating in the announcement of the abolition of the specialized prosecution office and the adoption of legislation that could be expected to drastically reduce the number of acting prosecutors.

## Laws Violated or Ineffective

Overall, the 2022 constitutional amendments concerning the judiciary, and the increased independence of public prosecutors as part of those reforms, have not produced significant positive effects. The real limits of prosecutorial autonomy became most evident when, for the first time in 30 years, the prosecution launched an investigation against a sitting minister, along with other proceedings not aligned with the interests of those in power. These actions were met with obstruction of investigations, attacks in pro-government media, and attempts to curtail prosecutorial capacities.

Although many **whistleblowers** receive protection of their employment rights under the law, no state body systematically monitors what happens following their reports. Moreover, the openly negative attitude of officials toward certain whistleblowers who publicly exposed corruption and other irregularities discourages the use of this mechanism. Public prosecution offices and other state authorities not only fail to act proactively, but also do not disclose information about the outcomes of criminal complaints that have been made public by the complainants.

The long-standing and **open disregard for anti-corruption rules** has continued, most visibly in the failure to professionalize the management of state-owned enterprises and public administration. The Government of Serbia no longer even attempts to create an appearance of legality, appointing acting officials retroactively, extending mandates beyond legal limits, or allowing acting officials to continue performing duties without any legal basis. The transformation of public enterprises into joint-stock companies has begun, yet one of the key corruption risks related to their governance remains unaddressed. Due to an unfounded "authentic interpretation" of the term "public official" from February 2022, which continues to be applied, members of shareholders' assemblies, supervisory boards, and directors of major state-owned companies are not obliged to submit asset and income declarations. The Constitutional Court has still not ruled on the initiative filed by Transparency Serbia challenging the constitutionality of provisions that allow Parliament to arbitrarily and retroactively alter the meaning of previously adopted laws through "authentic interpretations".

**The budget and other public resources remain unprotected.** Infrastructure priorities, financed through increasingly costly borrowing, are determined without a previously established and adopted plan. Citizens, who will ultimately repay these debts, have no opportunity to influence such priorities, and warnings from relevant state bodies, such as the Fiscal Council, are dismissed without argument. In many cases, including reports by the Anti-Corruption Council, documented instances of harmful, and often unlawful, decisions

regarding the management of public funds remain unexamined. Contrary to the Fiscal Strategy, in the run-up to elections or similar occasions, the authorities introduce previously unplanned public expenditures in order to secure political support at the expense of all citizens. The dominance of direct negotiations instead of competitive tenders, accelerated procedures, and criteria tailored to pre-selected strategic partners is particularly visible in large infrastructure projects. This trend was further reinforced by the special law for EXPO 2027, which excluded the application of public procurement rules and thereby eliminated the possibility for companies to seek legal protection if they detected rigged procurement. In early 2024, Transparency Serbia submitted an initiative to the Constitutional Court challenging the constitutionality and legality of Article 14 of this special law, which concerns public procurement. Despite the obvious urgency, the Court failed to resolve the issue in following two years. Meanwhile, another “special law” removed the former General Staff complex and its surroundings from the general legal regime, with provisions drafted in a manner seemingly intended to legalize previously unlawful Government decisions (regarding cultural heritage protection and the contracting of a form of public-private partnership). The Constitutional Court has not ruled on this matter either.

Furthermore, the Government cites and promotes the “Leap into the Future – Serbia 2027” program as the basis for implementing major infrastructure projects, even though it has officially confirmed that such a program does not exist. There is no reason to assume that the recently announced “Serbia 2035” program will be any different.

Not only is **the decision-making process in many important matters opaque**, but decisions are frequently made outside the institutions formally competent to adopt them. In particular, many decisions falling within the remit of the Government, Parliament, and other bodies are in substance made by the President of the Republic. This can be inferred both from the President’s own statements and from statements by nominally responsible officials who regularly invoke his authority, as well as from disclosed documents indicating significant involvement of presidential advisers in the implementation of certain projects. One illustration of this relationship was visible during the President’s recent attendance at a session of the Government of Serbia.

The reasons behind decisions, the interests driving them, and assessments of their impact remain unknown. In the seventh year of implementation of the Law on Lobbying, influence over decision-making has become no more transparent than before its adoption, and there has been no attempt to expand the scope of the law in line with GRECO’s 2022 recommendation. Similarly, citizens’ ability to influence legislation has been significantly restricted: for some laws, no public debate was organized at all (e.g., the “legalization law”), while for others, proposals were ignored without explanation (e.g., amendments to the Criminal Code). The Government recently amended its Rules of Procedure to introduce an additional legal basis for not organizing public consultations, rather than ensuring compliance with existing rules. An even more effective way for the authorities to bypass public consultations and other obligations (such as seeking opinions on corruption risks from the Anti-Corruption Agency) has proven to be the submission of draft laws directly by Members of Parliament. This was recently the case with the special law concerning the General Staff complex, as well as with amendments to several judicial laws.

Opacity is further reinforced by the failure to act upon requests for access to information and upon decisions of the Commissioner for Information of Public Importance, the completely ineffective legal protection available only before the Administrative Court when information is requested from the Government of Serbia, and the practice of state authorities failing to proactively publish information they possess, even when legally obliged to do so.

## Recommendations of International Organizations

European integration has not been properly leveraged to advance the fight against corruption, and the key criticisms are repeated in every new report of the European Commission. Even when a long-standing issue previously flagged by the EU is addressed (such as the repeal of the special law on linear infrastructure), it quickly becomes clear that this does not reflect a genuine commitment to applying EU standards (e.g., the adoption of a special law for EXPO 2027).

Part of the reason lies in the EU's method of "monitoring progress," which sometimes sends misleading signals: "limited" or "some" progress is recorded even where there has been no substantive improvement. Although the list of required reforms has been clearly defined for years, monitoring tends to focus on a few selected reforms, often those whose effects can only be demonstrated in the long term, such as the recent appointment of the Council of Regulatory Authority for Electronic Media (REM) and the adoption of legislation to revise the voter register.

The opportunity to stimulate reforms through financial incentives (the Western Balkans Growth Plan and the Reform Agenda) has also failed so far to produce significant results.

Notable observations from resolutions of the European Parliament have been met with hostility by the authorities, that is, without even a rhetorical acknowledgment of the criticisms and recommendations. By contrast, Rule of Law reports issued by the European Commission have been almost entirely ignored. Recommendations from other international organizations, such as ODIHR and GRECO, have likewise largely been disregarded in recent years.

Failure to implement GRECO's recommendations from the Fifth Evaluation Round, even after the second deadline for full compliance expired, means that Serbia still lacks a functional system for overseeing the top executive level and does not ensure even basic transparency on some fundamental issues (e.g., information about ministers' advisers), while anti-corruption mechanisms within the police have been improved only marginally.

As for ODIHR's recommendations, there have been no attempts to amend the legal framework in line with the main priority from its most recent election observation report - the separation of party and state. Instead, during five local elections in 2025, as well as in the periods between them (e.g., in connection with "counter-rallies"), the practice of "campaigning in official capacity" by national and local officials has continued or intensified, along with the misuse of public enterprise resources and the presentation of party rallies as state or civic events.

## Key Recommendations of Transparency Serbia

### On political corruption:

- Establish secure channels for reporting irregularities related to the misuse of public resources, abuse of public office, and the electoral process, and ensure their promotion by state authorities;
- Urgently investigate all publicly disclosed violations of rules before and during the December 2023 and June 2024 election campaigns, the 2025 local elections, as well as in the periods between elections;
- Legally restrict the practice of “official campaigning,” i.e., ostensibly regular activities of public officials undertaken for political promotion, establish effective independent oversight, and legally limit public spending in the period before and immediately after elections;
- Limit election campaign expenditures, clarify the duties of the Anti-Corruption Agency in controlling campaign finance reports, and ensure greater transparency of data while the campaign is ongoing;
- Creating conditions to curb political corruption by appointing lawful and professional managers in state-owned enterprises and the public administration;
- Ensure greater transparency of influence over the adoption of legislation and individual decisions, whether through registered lobbying, unregistered lobbying, or informal forms of communication not covered by the Law on Lobbying;
- Respect constitutional and legal rules and the principle of separation of powers in decision-making.

### On anti-corruption planning:

- Determine the reasons for failing to achieve the objectives of the National Anti-Corruption Strategy 2013–2018 and establish accountability for the non-implementation of activities from the Action Plan for Chapter 23;
- Revise the draft Action Plan for the Anti-Corruption Strategy for the period 2026–2028 to include measures capable of delivering visible progress in practice, with the involvement of stakeholders who were excluded during the preparation of this document;
- Incorporate corruption prevention measures into the program of the new (or “reconstructed”) Government, with an explicit commitment to abandon unlawful practices (particularly regarding the appointment of acting officials), introduce the practice of regularly acting upon reports of the Government’s Anti-Corruption Council, and establish consistent publication of documents of public interest (contracts, information on influences in the decision-making process, explanations of by-laws and personnel decisions, Government conclusions, etc.).

### On prosecution and sanctions:

- Examine all cases of suspected corruption in which documents have been disclosed or direct allegations have been made, without waiting for anyone to file a criminal complaint with the public

prosecutor, and publish information on the outcomes of these examinations, including a reasoned explanation where it is determined that there is no criminal liability;

- Initiate criminal proceedings in cases involving obstruction of corruption investigations;
- Ensure all necessary conditions for prosecuting corruption through the use of special investigative techniques, conducting financial investigations in parallel with criminal proceedings, and acting proactively in investigating corruption. This includes amending the Criminal Code, the Criminal Procedure Code, and the Law on the Organization and Jurisdiction of State Authorities in Combating Organized Crime, Terrorism and Corruption, in order to enable more effective prosecution of certain forms of corruption and to determine the required number of public prosecutors;
- Improve and introduce comprehensive oversight of the implementation of the Law on the Protection of Whistleblowers;
- Publish information on the implementation to date of the Law on the Determination of the Origin of Property and Special Tax, assess its anti-corruption effects (if any), evaluate the impact of asset and income control of public officials carried out by the Anti-Corruption Agency, and open a debate on criminalizing “illicit enrichment” within the meaning of Article 20 of the United Nations Convention against Corruption (UNCAC).

## On transparency and prevention:

- The Government of Serbia should ensure the enforcement of decisions issued by the Commissioner for Information of Public Importance and begin regularly complying with received access-to-information requests;
- The possibility of appealing to the Commissioner should be introduced even in cases where information is withheld by the Government, the National Assembly, the President of the Republic, the Supreme Court, the Supreme Public Prosecutor’s Office, the Constitutional Court, and the National Bank;
- The right of access to information must not be restricted by provisions of other laws, and the exercise of this right should be extended to information held by currently not included entities (e.g., joint enterprises within public-private partnerships);
- Public authorities should publish all information in open data formats, and state oversight bodies should cross-check data from these databases when determining their work plans and conducting scrutiny;
- An obligation should be introduced to prepare and publish reasoned explanations for decisions where this is currently not required (e.g., certain Government conclusions);
- The National Assembly should apply the provisions of the Code of Ethics in cases where Members of Parliament fail to provide the public with rational for their actions;
- The Government and the National Assembly should amend their Rules of Procedure to ensure that public consultations are conducted when adopting and amending all laws.

## On public finances:

- Ensure full disclosure of information regarding the transformation of public enterprises, the impact of unprofessional management on public finances, and any potential role of external consultants in their future governance;
- Conduct oversight of the planning, implementation, and execution of public procurement procedures in a significantly larger number of cases by the Public Procurement Office, the Budget Inspection, and the Commission for Protection of Competition, as well as by the State Audit Institution with regard to the expediency and value-for-money aspects of such procedures;
- Ensure full transparency in public-private partnerships and annul all contracts that essentially constitute PPP arrangements but were concluded without applying the relevant law or another valid legal basis;
- Discontinue the practice of concluding intergovernmental agreements that allow for the exclusion of transparency and competition in the awarding of public procurement contracts, public-private partnerships, and the sale of public assets;
- Cease the practice of conducting procurements based on special laws adopted for individual infrastructure projects and repeal the recently adopted special law for EXPO 2027 and the special law concerning the General Staff complex;
- Increase the transparency of data on allocations from the budget reserve (contingency funds);
- Provide comprehensive justifications for the selection of infrastructure projects, the cost-effectiveness of borrowing, and measures of financial support;
- Enable citizens to influence budget priorities at the national level;
- Publish in-year budget execution data in a manner that allows monitoring by budget users and programs;
- Regularly consider reports and analyses prepared by the State Audit Institution and the Fiscal Council and act upon their recommendations.

Transparency – Serbia  
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